

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

Status: Submitted

Last Updated: 06/26/2017 12:45 PM

Technical Review Coversheet

Applicant: Oklahoma Public School Resource Center, Inc. (U282A170021)

Reader #1: *****

	Points Possible	Points Scored
Questions		
Selection criteria		
Flexibility		
1. Flexibility	10	10
Sub Total	10	10
Selection Criteria		
Objectives		
1. Objectives	15	10
Quality of Eligible Subgrant Applicants		
1. Quality of Subgrant	15	14
State Plan		
1. State Plan	20	19
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	12
Sub Total	90	73
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	1
Sub Total	2	1

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	0
Sub Total	2	0

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	104
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Technical Review Form

Panel #20 - Panel 20 - Oklahoma - 1: 84.282A

Reader #1: *****

Applicant: Oklahoma Public School Resource Center, Inc. (U282A170021)

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:

Oklahoma not only provides a broad range of areas of flexibility for charter schools, but also provides support to charter schools to ensure that they take full advantage of the freedom and flexibility they are allowed. The applicant states that the Oklahoma Charter School Act specifically addresses charter school flexibility by exempting charter schools from "all statutes and rules relating to schools, boards of education, and school districts" (e41). The freedom and flexibility charter schools have covers five key areas described by the applicant: Personnel, Budgeting, Curriculum and Instruction, Scheduling/Attendance, and Governance. The flexibility granted regarding personnel is primarily regarding teacher credentialing and participation in state retirement and benefits programs. The exemption from credentialing allows charter schools flexibility in recruiting staff to serve the specific needs of their population. The flexibility afforded in these key areas provides charter schools with freedom and flexibility to maintain primary control over the operations of the school and the resources needed to support the program (e42-43).

To maximize the flexibility provided in law, technical assistance is available to charter schools. The Oklahoma Public School Resources Center is a technical assistance provider to charter schools. Its purpose is to ensure that charter schools understand and fully use the flexibility they are afforded (43).

Weaknesses:

No weaknesses identified.

Reader's Score: 10

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 identifies three primary goals for the project: 1. Increasing the number of high-quality charter schools in the state, 2. Improving student outcomes for educationally disadvantaged students, and 3. Disseminating best practices (e44-47).

The applicant has set a goal of "adding up to 25 new charter schools within the five-year granting period" (e44). The applicant states that due to recent changes to legislation, charter schools have begun expanding into rural communities. The applicant states that the CSP grant will "accelerate charter growth in both the urban areas of Tulsa and Oklahoma City but also rural communities across the state" (e44). The applicant's first goal will result in additional schools to areas currently benefiting from school choice options, as well as bringing school choice to areas where the district schools are

the only option (e44-e45).

To improve outcomes for educationally disadvantaged students, the applicant has identified 10 charter schools that received an A or B on the state's 2016 A-F report card (e44). The applicant provided a table that demonstrates that these schools serve a range of educationally disadvantaged student populations (FRL and ELL) (e45). The replication of schools that have proven successful with economically disadvantaged students supports the applicant's second goal.

In support of goal three the applicant seeks to contribute to the growth of quality charter schools through the dissemination of best practices. The applicant states that the plan for disseminating information is described in section f of the application (e47). The performance measures, located in section f of the application on pages e73-74, indicate that "OPSRC will post at least 5 best practice deliverables on the charter resources page" and "OSCP will host an annual 'lessons learned' conference highlighting best practices. The combined use of online posting and in-person conference to disseminate information not only makes the best practices information readily available (online posting), but also provide opportunities to engage and discuss implementation (in-person conference).

Weaknesses:

Although the applicant has set quantifiable measures for its goals, insufficient information was provided to demonstrate that these are ambitious goals. The information provided regarding the number of new schools opening each year or approved to open was limited to rural schools. The first rural Oklahoma charter school opened in August 2016 and 2 additional rural schools were approved in 2017 (e44-45). Because the applicant has not limited its CSP grant to rural schools, this information is not sufficient to demonstrate the ambitious ness of this goal. Information regarding the number of new schools that open yearly was not provided to demonstrate that the goal of adding 5 per year is an ambitious goal.

Baseline data was provided regarding the academic performance of students in charter schools (e73). The Average Charter Index scores for all students and students in the bottom quartile were provided. The applicant did not identify a target score and target increase amount. Additionally, despite identifying 10 charter schools that received an A or B on the state's 2016 report card (e26-27), the applicant has not demonstrated that those schools have indicated interest or desire to expand or replicate through the CSP subgrant to serve additional students.

The goal regarding dissemination of best practices were to post at least 5 best practice deliverables on the OPSRC website and to host an annual conference highlighting best practices. The applicant did not provide information regarding the current amount of information on the OPSRC regarding best practices to demonstrate that posting 5 best practices is an ambitious goal. Additionally, information about any conferences provided by OPSRC was not provided to demonstrate that conducting the annual conference would be an ambitious goal.

Reader's Score: 10

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 identifies three steps to be taken to attract and support eligible high-quality applicants. The first, Work with Partner Organizations (e47) focuses on existing charter operators or organizations that provide support to potential applicants. The applicant identifies 4 partner organizations (e47-48), which includes 12 existing high quality charter schools; the Native American Community Academy, which focuses specifically on preparing Native American students for college; Advance Rural Education, which is focused on creating coalitions to support education in rural communities; and the High Tech High fellowship program at the Graduate School of Education. The outcome of collaborating with these 4 categories of organizations will contribute to the pool of quality applicants (e47-48) that have demonstrated through past

performance the capacity to operate a high-quality school, and a network of relevant resources to support high-quality schools.

Secondly the applicant has created, and will provide to applicants, a charter toolkit which is described as providing resources to support the development of a quality subgrant application (e47-48). The toolkit focuses on the criteria that all applicants will be required to address. Potential applicants that utilize the toolkit effectively should be well prepared to submit a quality application.

The applicant describes 5 technical assistance opportunities will be provided (e49). The technical assistance consists of two webinars and three regional in-person meetings. The technical assistance will focus on the attributes of a successful grant application and will be provided prior to the application window beginning (e49). Applicants that take advantage of the technical assistance are expected to be "committed entities willing to dedicate substantial time and effort to the process" (e49).

These three tactics provide multiple opportunities through a variety of methods for authorizers to work with potential subgrant applicants to develop effective models that will result in improved educational results for students.

Additionally, a technical assistance team will be created (e50) that "will support charter school applicants as they draft their charter school applications and related CSP sub-grant applications." The applicant states that this will ensure applicants are well-prepared, and that the technical assistance team will be better prepared to monitor schools due to their familiarity with the applicant.

Applicants are expected to include existing charter operators looking to "expand/replicate existing high-quality charter schools" (e59) as well as new schools "based on models that have been proven to successfully increase student achievement, especially for educationally disadvantaged students"(e59). Subgrant applicants will be required to demonstrate "capacity for or history of creating high-quality charter schools" through proven past performance or research that supports the proposed school model (e60). These criteria will ensure that successful applicants have a sound plan for a high-quality charter school that is likely to improve student academic achievement.

Weaknesses:

Two of the four partner organizations identified in the application to support the creation of quality applicants have unproven results. The High Tech High fellowship at the Graduate Schools of Education approved its first applicant in 2017 (e48). The Advance Rural Education (ARE) organization was created in 2016 and has submitted its first rural charter application in 2017 (e48). Without evidence that these organizations demonstrate success, it is not clear how they will effectively contribute to the creation of quality applicants.

Reader's Score: 14

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 describes the creation of a technical assistance team that will be responsible for the implementation and oversight of the CSP grant (e50). Oversight monitoring will consist of verification that financial processes are in place to ensure that subgrantees are able to accurately create financial reports to document income and expenditures. Oversight will also include the verification that reports are submitted on time and fulfill all requirements. The academic performance framework will be used to evaluate the academic performance of charter schools (e131-e144). Academic measures include proficiency and academic improvement in Reading/English Arts and Math for all students as well as students in subgroups

The technical assistance team will also play a role in monitoring reporting to reduce instances of duplicative work. The technical assistance team will "work with charter school authorizers and the OSDE to craft oversight procedures that collect necessary information without imposing obstacles" (e52). A reporting management system will also be purchased (e52) to ensure "proper oversight while eliminating duplication or effort"(53).

Technical assistance for applicants receiving subgrants will include documents publicly available on the OPSRC website. The technical assistance team will be responsible for keeping information and documents current (e54). The technical assistance team will have access to, and leverage the expertise of the OPSRC. This includes drawing on the knowledge and experience of several OPSRC directors. The use of this subject matter expertise will allow the technical assistance team to provide subgrantees information and resources to support implementation of their projects (e54-55).

Technical assistance to support quality authorizing includes the resources provided by OPSRC on its website (e55), which the applicant states has been frequently updated as a resource and reference tool for authorizers. Additionally, the OPSRC has indicated that it will work with the Tribal Education Departments National Assembly (TEDNA) to support tribal authorizers. TEDNA provides support to authorizers through the Sovereign School Project. Resources created by SSP have been incorporated into the OPSRC charter toolkit (e55).

Weaknesses:

One of the strategies related to proper oversight and avoidance of duplication of work is open lines of communication between subgrantees, the OPSRC's technical assistance team, charter authorizers and the State Department of Education (e53). Although this provides an opportunity for communication it does not demonstrate how it will result in reduction of duplicative work for charter schools. There is no indication that authorizers or the State Department of Education would be willing to change their requirements to reduce or avoid duplicative work.

Reader's Score: 19

Selection Criteria - Parent and Community Involvement**1. The State entity's plan to solicit and consider input from parents and other members of the community on the implementation and operation of charter schools in the State.****Strengths:**

The applicant states that feedback will be solicited from "a multitude of sources including parents and other community members" (e58). A table was included (e59) identifying several organizations that have offered letters of support, and that will be a source of feedback and input. The organizations listed include community and business organizations, a parent group, and a tribal organization. Collectively these organizations represent a cross section of the stakeholders served by charter schools. These partner organizations will also collect feedback from families through surveys on their websites. Additionally, families with students currently attending charter schools will be surveyed for "feedback on their satisfaction or dissatisfaction with their school and ask for responses on how they feel the schools could improve their services."(e59). The collection of survey information and feedback from partner organizations in the community represent a plan for soliciting feedback and input from parents and the community.

Weaknesses:

The applicant did not address how the collected input would be considered. Although a plan is provided for soliciting information (e58-59), a description of how the information collected from these various organizations will be organized, analyzed, and reviewed by the applicant was not provided. Because the applicant has stated that it intends to solicit feedback from "a multitude of sources including parents and other community members, business leaders, representatives from educationally disadvantaged populations, faith leaders and philanthropic organizations" (e56), it is reasonable to expect a large volume of data will be collected. Without a detailed plan for processing this information it is unlikely that the applicant will be able to draw meaningful conclusions regarding the implementation and operation of charter schools.

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:

1. The applicant states that the subgrant application process will be open to both existing and new charter operators (e60). Subgrant applicants will be required to demonstrate "capacity for or history of creating high-quality charter schools" through proven past performance or research that supports the proposed school model. (e60). These criteria will ensure that successful applicants have a sound plan for a high-quality charter school that is likely to improve student academic achievement.

Applications will be reviewed in a 2-phase process. Phase 1 will ensure that applications are complete. Phase 2 is a review conducted using a scoring rubric. (e63)

A table was provided that identified the timeframe from CSP award to subgrantee award and implementation (e64). The timeframe is adequate from the actions identified.

Weaknesses:

Limited details are provided regarding the elements of the application that will be reviewed as part of Phase 2 (e63). General categories are identified: "narrative, budget, timeline and all critical details" (e63). This is not sufficient detail to demonstrate that subgrantees will have demonstrated a plan for creating a high-quality charter school that improves student achievement. Averages of reviewers scores will be used. Without opportunity for reviewers to discuss scores, outliers may skew average ratings for schools. This can result in poor applications receiving an inflated score and being approved for a subgrant, or a quality application receiving a lower average score and not being funded (e63).

Year-by-year estimates of subgrant awards were provided (e65-66), but no explanation was provided to support these amounts of funding. No rationale was provided to justify the \$150,000 award amount for sub-grants. The budget (e182-193) was reviewed for information to support the award amounts, but no detail was provided in this section of the application.

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 logic model identifies resources, activities, and outputs that support the primary goals of the proposed CSP project. The logic model incorporates activities described in the narrative that support the outputs and outcomes (e69). Narrative descriptions of the objectives and activities presented in the logic model are also provided by the applicant to demonstrate that the logic model addresses the use of charter schools to improve educational outcomes for students (e70-71).

The performance measures are aligned with and support the objectives identified in the logic model. The first objective, increasing the number of high quality charter schools, is aligned with the performance measure "25 additional charter schools opened and operated by August 2023" (e72). Reaching this performance measure would fulfill the objective. The second objective is also supported by its two performance measures. Increasing the Overall Student Proficiency Index score in reading and math for all students in charter schools, and specifically those in the bottom quartile would fulfill Objective 2 "Improve student outcomes in Oklahoma charter schools, especially for educationally disadvantaged students."(e73). The third objective, "Disseminate best practices"(e73) is aligned with the two performance measures. Posting at least 5 best practices on the OPSRC website and hosting an annual conference support objective 3.

Weaknesses:

The applicant does not address how the project will be managed to ensure activities are completed on time and within budget. No timelines are identified for each of the activities in the logic model (e69). Additionally, the budget (e182-193) does not identify anticipated costs for the activities described in the logic model. Further, no responsible parties are identified for the activities in the logic model. According to the applicant, the OPSRC technical team is responsible for most of the project (e74). Resumes were provided for both Eric Doss and Brent Bushey, the founding executive director of the Oklahoma Public School Resource Center (e79-83), however, it is not clear from the logic model or narrative what responsibilities Doss and Bushey will have.

The applicant states that the technical assistance team will monitor the project and "make note of and address with the

appropriate subgrantee any compliance issues or findings that may arise via an audit or other monitoring review." (e74-75) Specific steps or actions the technical assistance team will take or require of the subgrantee are not specified in the narrative. This failure to identify actions does not demonstrate capacity of the management plan to adequately address compliance issues.

Reader's Score: 12

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 states that annual performance reviews that include evaluation of academic and operational performance are used to monitor the performance of charter schools (e20). An academic performance framework checklist document was provided that identifies the specific measures and targets used to evaluate the performance of charter schools (e131-e144). Academic measures include proficiency and academic improvement in Reading/English Arts and Math for all students as well as students in subgroups. The framework demonstrates that a process is in place for evaluating the performance of charter schools.

A sample charter school contract was provided (e145-164). The contract states that an evaluation of academic, organizational, and financial performance will be conducted annually. The school's performance will be part of the basis for renewal decisions made by the authorizer (e151). This demonstrates a process for the authorizer to take some action upon a charter school.

The applicant states that the Oklahoma Charter School Act (Act) "provides that an authorizer is to terminate a contract during the term of the contract if it determines the school fails to meet the requirements for student performance, in any or all subgroups, contained in the contract." (e27) This clearly indicates that the authorizer has the ability to take action or impose consequences including closure during the term of the charter.

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 applicant states that since 1999 the Oklahoma Charter School Act (Act) has required "that each charter school in the State operate pursuant to a legally binding charter and charter school contract" (e23).

A sample charter school contract was provided (e145-164). The contract identifies specific rights, responsibilities, and requirements of the charter school and the authorizer. The authorizer's responsibilities include annual monitoring. Section 5(a)(II) states that the authorizer "shall monitor and report on the Charter School's progress in relation to the indicators, measures, metrics and targets set out in the Performance Framework" (e150). The charter school's responsibilities include requirements for the educational program (e140 – 150) including specific sections pertaining to English Language Learners and Students with Disabilities, as well as rights regarding school facilities and funding (e155-156).

The applicant states that the Act requires "every charter school in the state to conduct annual independent audits of the financial statements" (e24). Further, the annual audits are required to be submitted to the State Board of Education by the charter school and authorizer (e25).

The performance framework evaluates the academic improvement of students annually. In order to meet the performance measures related to academic improvement "at least 50% of FAY students who scored below Proficient in the previous year" must improve their scores in the following year "to reach the next quadrant as measured by the OSTP" (e132). This demonstrates that improved student academic performance is a component of the charter contract.

A sample charter school contract was provided (e145-164), which states that the school's performance will be part of the basis for renewal decisions made by the authorizer (e151). Further, the Oklahoma Charter Schools Act states that "authorizer must use increases in student academic achievement for all groups of students" (e26) when making decisions to renew or revoke a charter.

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 Oklahoma Charter School Act (Act) allows every school district in the state to authorize charter schools. (e28). Additionally, twenty-seven higher education institutions, thirty-eight Native American Tribes, and twenty-nine career and technology centers are identified as authorizers (e28). This demonstrates that the state provides for authorizers that are not LEAs.

The Act allows for appeals to the State Board of Education when "the applicant has first been denied a charter by the local school district" (e28-29). The State Board of Education has approved two charters that were initially denied. The Act also allows a denied applicant to proceed to binding arbitration with an authorizer that has rejected its application (e29). These two processes demonstrate mechanism for appealing denials of charter school applications.

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:

The applicant states that funding for charter schools is distributed at the same time as traditional public schools (e28-29). Because charter schools are considered to be an LEA, state funds are delivered directly from the state to the charter school (e29). This direct delivery of funds ensures that charter schools receive funds in a timely manner comparable to traditional public schools.

Weaknesses:

Charter schools receive 5% less than the full state aid allocation. This five percent allocation is retained by the school district as a fee for administrative services (e29). No data was provided to demonstrate that a comparable amount of state aid funding is held by the district for administrative services provided to traditional public schools within the district. Further, the 5% retained by the district impacts charter school funding so that despite equitable per pupil funding being allocated by the state, charter schools will not be able to receive equitable funding as compared 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:

The applicant has demonstrated that charter schools are provided low cost leasing privileges for facilities. Charter schools are able to rent facilities owned by districts at below market rates (e31). Additionally, charter schools are eligible to lease property at governmental lease rates for "privately owned facilities that accept government rates." (e31)

Weaknesses:

No weaknesses identified.

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:

No strengths identified.

Weaknesses:

The applicant does not describe a process for using best practices from charter schools. Although development conferences will "highlight best practices in high-quality charter schools" (e32), and "evidence-based information and research on best or promising practices in charter schools" will be distributed, the applicant does not describe how the state uses this information. This describes distribution of information by the state; it does not demonstrate the extent to which the state uses best practices to help improve struggling schools.

The applicant states that a member of the Charter School Advisory Council is also member of the Executive Advisory Council that "guides the policy priorities for education in the State" (e33-34). Although this demonstrates the potential for information and data from charter schools to be part of policy discussions, it does not demonstrate that the state is using best practices to improve struggling schools or local education agencies.

Reader's Score: 0

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:

The applicant states that authorizers are required to give priority to "opening charter schools that serve at-risk student populations or students from low-performing traditional public schools"(e34). Additionally, the State Board of Education

has contracted with the Oklahoma Office of Juvenile Affairs for the purpose of "sponsoring four charter schools that are located in correctional institutions." (e34). This demonstrates that the state has prioritized the creation of charter schools that serve at-risk students. The state further supports schools serving at-risk student by providing additional funding (e35). It is clear from these descriptions that Oklahoma has several processes by which it provides support for charter schools serving at-risk students.

Weaknesses:

No weaknesses identified.

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 applicant states that authorizers are required to implement policies and practices that are "consistent with recognized principles and standard for quality charter authorizing established by the OSDE" (e37). The policies and practices covered by these authorizer best practices include organizational capacity and infrastructure, charter application evaluation, performance contracting, and oversight and evaluation of charter school. Additionally, the Oklahoma State Board of Education has adopted, for all authorizers in the state, NACSA's charter authorizer principles and standards (e37). The state has clearly identified and implemented best practices for charter school authorizing, and by requiring authorizers to implement them, has taken steps to ensure that they are implemented by its authorizers.

Weaknesses:

Authorizers are required to "develop and maintain chartering policies and practices consistent with recognized principles and standards for quality charter authorizing"(e37). The applicant does not identify any training or technical assistance that will be provided to the broad range of authorizers in the state. No plan is presented to describe how the applicant will ensure that every school district in Oklahoma, twenty-seven higher education institutions, thirty-eight Native American Tribes, and twenty-nine career and technology centers implement best practices for charter school authorizing.

Reader's Score: 4

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Technical Review Coversheet

Applicant: Oklahoma Public School Resource Center, Inc. (U282A170021)

Reader #2: *****

	Points Possible	Points Scored
Questions		
Selection criteria		
Flexibility		
1. Flexibility	10	9
Sub Total	10	9
Selection Criteria		
Objectives		
1. Objectives	15	10
Quality of Eligible Subgrant Applicants		
1. Quality of Subgrant	15	14
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	10
Sub Total	90	70
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	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	0
Sub Total	2	0

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	5
Sub Total	5	5

Total	125	100
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Technical Review Form

Panel #20 - Panel 20 - Oklahoma - 1: 84.282A

Reader #2: *****

Applicant: Oklahoma Public School Resource Center, Inc. (U282A170021)

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 charter school law appropriately offers charter schools the flexibilities that are not offered to traditional public schools. Pursuant to state law [70 O.S. 3-136], charter schools are exempt from state statute and regulations that generally apply to traditional public school, boards, and school districts. Charter schools are offered flexibility around decision making for human capital, curriculum, school calendar, budgets, and governing. (pages e41 to e43)

Oklahoma Public School Resource Center (OPSRC) provides its charter school members with technical assistance. The professional development ensures that charter schools understand the law and the flexibilities under the law. The OPSRC offers training in the follow areas: legal, finance, technology, communication, and teaching and learning. (page 43)

Weaknesses:

While the state statute provides flexibilities to charter schools, there is no evidence to support the steps the applicant will take to further advance the flexibility under the law. OPSRC will provide technical assistance to its member schools; however, until the grant is secured, there path to providing additional flexibilities is not described in detail. (page e43)

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 articulates the objectives that will drive the charter school program. On pages e45 to e46, the applicant describes the three objectives that will guide the work during the next five-years. The first goal is to increase the number of charter schools in Oklahoma. The goal is to ensure that the new schools are serving students who are educationally disadvantaged. On page e44 of the proposal, the applicant indicates that the state intends to expand its charter portfolio, adding twenty-five (25) schools, during the five-year grant period. (page e45)

The second goal is to advance student outcomes. The applicant stresses the importance of improving the academic results for educationally disadvantaged students. The proposal highlights ten high-achieving charter schools, who serve educationally disadvantaged students that will be considered for replications. As part of the CSP grant, the state will provide charter schools who intend to serve in high needs areas, with priority preference. (pages e45 and e46)

The third, and last goal, outlines the applicant's plans to share best practices from high-achieving charter schools. (pages e46 to e47). The applicant asserts that providing guidance and technical assistance will result in improving the quality of

education.

Weaknesses:

The objectives are clear; however, determining the ambitiousness of the plan is not. The proposal indicates that the grant will allow for 25 additional charter schools. The application does not provide a historical reference of growth experienced in Oklahoma's charter sector. There is no evidence to assess the feasibility of this project objective. Further, their application references the desire to leverage local high-quality schools to assist with the growth. However, the proposal is ambiguous regarding whether the state will rely solely on local talent or recruit out-of-state charter developers. (page e45 to e46)

Reader's Score: 10

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 details the likelihood of meeting the goal of opening twenty-five (25) school over the grant period. Pages e47 and e48 list various organizations Oklahoma Public School Resource Center (OPSRC) will actively recruit to complete sub-grant applications. There are at least, twelve high performing single site charter schools that the applicant has identified as potential candidates for replication. The Native American Community Academy (NACA) intends to replicate its educational model. Advance Rural Education (ARE) recently opened a school, and if successful, will seek to open additional sites. High Tech High, in collaboration with the Graduate School of Education, has created a fellowship program. Graduates [from the program] are trained to open and manage high-quality charter schools. (page e47 and e48)

OPSRC will offer technical assistance to prospective sub-grant applicants. (page e49) OPSRC host informational overviews and in-person meetings to engage prospective sub-grant applicants. OPSRC will also provide toolkits that will help the applicant understand and meet (?)the rigor of and components within the sub-grant application. This guidance will increase the probability of an interested sub-grantee submitting a quality application. (page e49)

Weaknesses:

While the proposal lists the twelve high quality schools as prospective sub-grantees, there is no evidence to support that the charter schools are willing to replicate and or expand. (page e47) Additionally, the fellowship programs (i.e., Native American Community Academy and High Tech may not result in fellows opening schools in Oklahoma. (page e47 and e48). Advance Rural Education (ARE) and High Tech High initiatives are new. ARE submitted its first application in 2017 and the High Tech High fellowship started in 2017. There is limited evidence to determine whether the programs produce high academic outcomes. (pages e47 and e48)

Reader's Score: 14

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 proposal details OPSRC's role in providing technical assistance to the state's traditional public and charter schools. The office will add a technical assistance team that will provide support to the sub-grantees who are awarded funds. The OPSRC recently hired a director who, if awarded the grant, will be responsible for overseeing the grant. (page e50)

The technical assistance team will provide the following oversight: 1) verify reporting systems; 2) monitor the completion of reports; 3) confirm school leader(s) are effective, and 4) supervise the school opening process. Overall, the role of the technical assistance team is centered on ensuring the likelihood that school is set up to for success. (page e51)

The applicant asserts that duplicated efforts will be eliminated through dedicated support from the technical assistance team, development of a cohesive report management system (Epicenter), and established communication protocols. (pages e51 to e53)

Quarterly, OPSRC meets with a group of charter authorizers. The meeting's focus is to provide charters with a forum to discuss and share promising practices regarding charter schools. (page e54)

To support the sub-grantees, OPSRC will produce documents that will be housed on the offices' charter resource center page. The department includes several subject matter experts (i.e., finance, legal, technology, communications, teaching and learning) available to assist sub-grant applicants (page e54). Further, the OPSRC's role is to provide technical assistance to new charter school applicants which assistance a service team will continue to provide to the sub-grantees interested in completing an application. To understand how to better service its customers, the OPSRC attends National Alliance of Public Charter School events. During these workshops, charter developers will provide attendees insight on how to build charter schools. (page e55).

The state board adopted NACSA's principles and standards in high-quality authorizing. Further, the OPSRC is collaborating with Tribal Education Departments National Assembly (TEDNA) to provide tribal authorizers with the technical assistance required for these leaders (and the schools) to be successful. (page e55)

Weaknesses:

The Epicenter reporting system is the tool the OPSRC will use to ensure that duplicative efforts are minimized. The applicant will use the grant to fund this web-based system (page e192). Until the system is up and running, there is no guarantee that duplicated efforts will be limited/avoided. (pages e52 and e53) While the proposal details that technical assistance such as monitoring grant reporting requirements, assisting with charter applications, and assisting with advancing student performance will be provided, there is limited information about the frequency with which the support will be provided. (page e50 to 53)

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:

State charter law requires charter applicant to demonstrate parent and community support for the school. (page e56) On pages e57 and e58, there is a list of organizations that OPSRC intends to engage in the work. Informational overviews

will be held across the state. OPSRC will work with organization to host event, and will also host separate sessions. The agenda will include: 1) educating parents/community about charter schools; discussing the CSP grant; and soliciting feedback from audience members. Feedback will be captured through open discussion (during the meeting) and a survey (after the meeting). (page e58)

OPSRC will also leverage feedback from parents to assist in determining where to potentially locate charter schools. Surveying will be used to obtain feedback from parents who have students currently enrolled in charter schools. (e58)

Weaknesses:

The proposal includes a well-developed plan to solicit information from parents and communities. The applicant provides limited details regarding how the state will solicit and consider feedback from parents who have children currently enrolled in charter schools. The feedback is limited to surveys, which may not result in significant feedback. Additionally, the applicant's response regarding the use of the feedback is vague. On page e59, the application indicates that feedback will be used to grow and meet the needs of the community. Feedback and use of the data, specifically for existing schools, are not referenced in the proposals. (pages e58 and e59).

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 proposal documents the approach, application process, and annual estimates that will be implemented to support the program's goals (i.e., replicating/expanding and opening new charters school that are high-quality and serve educationally disadvantaged youth). (page e59). To achieve the plan, the applicant outlines the plan to award five schools sub-grants each year over a five-year period (page e65).

Page e60 reports that twelve of the thirty-nine charter schools are high-performing (page e45), but have not replicated or expanded the school's educational model. Further, the applicant seeks to identify and offer sub-grants to organizations that want to open high-quality schools.

Elements of the sub-grant application process are outlined on page e61. Some of the criteria are: 1) budget, 2) operational management, 3) instructional strategies and curriculum, and 4) academic metrics. As previously noted, sub-grant applicants will be offered competitive preference if the organization is committed to educate: students with disabilities/English Language Learners, minority subgroups (i.e., Black, Native American, Hispanic), and populations that are economically disadvantaged. (page e61)

OPSRC will leverage partnership with organizations such as the Oklahoma Public School Association to build awareness about the program. A three-member evaluation team will be responsible for reading, assessing, and ranking the applications. (page e62) There will be at least one member from the authorizer or charter administrator to participate on

the review panel. (page e61). Page e63 details the two-phased application process. The timeline and rubric are on pages e64 and e65.

Two dedicated members on the OPSRC team will lead this work with support from the sixteen additional members of OPSRC's staff (page e60). These individuals will be responsible for monitoring the applicants' progress toward success. The team will conduct a desk audit as well as on-site visits. During the desk audit, the technical assistance team will determine whether goals are met and track compliance to federal and state regulations. (page e66) If a sub-grantee does not meet the requirements, proper notification will be provided. The sub-grantee will have a month to follow up on the identified infraction. If resolution is not found, the sub-grantee will lose the implementation funds. (page e67) The technical assistance team will be responsible for monitoring sub-grant phases and activities listed on page e67.

Weaknesses:

The project design lacks sufficient details. The applicant does not provide rationales that support the year-to-year estimate. (page e65 and e66). Further, the proposal does not explain assumptions used to project the planning and implementation estimates. The appendix (page e118 to e130) includes an application. The appendix (page e118 to e130) includes an application. However, it is not clear whether this application should be completed for new charter schools, new sub-grantees who are new to Oklahoma, or new sub-grantees who have existing schools. The process to release the funding is not included in the grant. For example, whether funding will be released in one lump sum or smaller increments. (page e65 – e66).

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 logic model is clear, concise, and aligned to statements made throughout the proposal.

The first goal is to increase the number of charter schools in Oklahoma. The goal is to ensure that the new schools are serving students who are educationally disadvantaged. On page e44 of the proposal, the applicant indicates that the state intends to expand its charter portfolio, adding twenty-five (25) schools, during the five-year grant period. The activities that applicant will implement to ensure this goal is met are: 1) begin funding applicants that have already been approved to open, 2) develop a communications plan that will build awareness of the program nationwide and leverage partnerships with organization [known in the charter community] to share the information, and 3) support charters meeting their goals and close charters that are not [meeting goals]. (pages e70 to e71)

The second goal is to advance student outcomes. The applicant stresses the importance of improving the academic results for educationally disadvantaged students. The proposal indicates that the state will work with charter school and charter management organizations that have already consistently improved outcomes for students who are educationally disadvantaged. (page e71) On pages e45 and e46, the applicant highlights ten high-achieving charter schools, who

serve educationally disadvantaged students, that will be considered for replication. Further, the applicant will recruit in-state and out-of-state charter developers with successful model. The potential 'recruitees' will have experience working with the student population (i.e., educationally disadvantaged). (page e71)

The third, and last goal, outlines the applicant's plans to share best practices from high-achieving charter schools. If the applicant receives that grant, two Oklahoma Public School Resource Center team members will have the responsibility for offering technical assistance to the charter school and its authorizer. The director will lead the work, and will hire external experts to provide support. The National Association of Charter School Authorizers is the external partner that office will engage to complete the work. Additionally, the applicant will work with existing charter school operators. The goal is to find and share charter best practices with other charter school applicants. (pages e71 to e72).

From pages e72 to e74, the applicant explains the performance targets for each objective and activity. Each activity has a feasibility explanation (i.e., why the applicant believes the goals will be met). Strategies for data collection and reporting are outlined as well.

There will be two OPSRC team members dedicated to the work. These members will be supported by the other 16 OPSRC team members, when applicable. Sub-grantees will work with the technical assistance team. This team will monitor the sub-grantees progress and communicate non-compliance immediately. (page e74 – e75).

Weaknesses:

The logical model is missing key information. For example, with exception of the annual growth goal for new charter schools (i.e., 25), the performance targets do not include annual targets. For example, the baseline benchmark is available; however, the growth metrics should be computed (i.e., 5% growth, 20% growth). (page e73). The management plan does not include a comprehensive list of the individuals who are responsible for implementing the program. (page e71 to e74).

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:

Pursuant to the law, entities that oversee charter schools are required to examine each school's performance annually (page e20). This mandate requires that schools meet the academic, financial, and operational performance targets that are outlined in the charter agreement. The state's Board of Education has developed a performance evaluative tool, which is used to assess schools. If metrics are not met, the charter school may face consequences. (page e20).

The Oklahoma State Department of Education (OSDE) publishes report cards for all public schools, which includes charters. This document reports the school's academic achievement results from the state-mandated assessment. Additionally, in the last year of the charter school's contract, the authorizer will conduct a comprehensive renewal evaluation. (page e21). During this review, the authorizer examines the charter school's academic, financial, and

operational performance over the term of the charter. The state statute indicates that review decisions must be based on evidence of performance. A renewal should only be granted to schools that have achieved the standards in the charter agreement. (page e21)

On page e22, the law allows for immediate closure of low-achieving schools. Charter schools ranked at the bottom five percent of public schools over three years will be closed.

Weaknesses:

No weaknesses 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:

Charter school's authorizer negotiates and executes legally binding charter agreements with all charter schools. (page e24)

A legislative act outlines forty-five requirements that describe the relationship between the authorizer and its charter school. The law also requires charter schools to have its financial statements audited annually. Audits are submitted to the State Board of Education and the local school district. The charter school and its authorizer may face infractions (i.e., imposed sanctions) if the audited statements are not submitted. (page e24)

All charter renewal decisions are based on evidence that the charter school has improved academic outcomes for students. The annual and renewal reviews evaluate student performance of all student subgroups. (page e27)

The State Board of Education developed performance framework that allows charter schools to assess and rate its academic achievement. (page e27 – e28)

Weaknesses:

No weaknesses 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 Oklahoma Charter Schools Act permits local school districts, higher education institutions, Native American tribes, and career and technology centers to become charter school authorizers. Additionally, the State Board of Education, in collaboration with the Office of Juvenile Affairs, may also become authorizers of charter school. The Virtual Charter School Board can authorize virtual charter schools. (page e28)

Pursuant to the law, charter school decisions may be appealed to the State Board of Education. (page e28 and e29)

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:

Charter schools receive the same state per-pupil allocation as their district peers. (page e29) In Oklahoma, charter schools are its own local educational agency. That said, charter schools are eligible to receive federal funding available to traditional public schools.

Weaknesses:

A charter school's state allocation is subject to a five percent authorization fee. (page e29).

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:

On page e31 of the proposal, the applicant indicates that most charter schools are housed in buildings owned by the school district. Rent is traditionally below the market rate. Additionally, the law permits charter schools access to government lease rate. The charter school law does not speak to bond or mill levies. However, on page e31 of the proposal, the applicant provides an example of an instance where a charter school moved into a facility where the authorized used bonds to cover the cost of building renovations.

Weaknesses:

Charter schools do not receive a facility allocation or right of first refusal to purchase public school buildings. Further, the state does not offer charter schools with assistance with facilities acquisition. (page e31)

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 proposal outlines the state's plan to leverage best practices in charter schools. The Oklahoma Public Schools Resource Center (OPSRC) will be responsible for distributing the learnings. (pages e32 – e34)

Weaknesses:

The narrative does not speak to the extent the state currently uses best practices from charter schools to help improve struggling schools and local education agencies. The proposal includes the state's approach to sharing best practices in authorizing and discipline with charters. (page e33)

Reader's Score: 0

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:

The State Board of Education, in collaboration with the state's Office of Juvenile Affairs, has approved four charter schools that educate students in correctional facilities. The schools recently added career-tech and credit recovery programs and other initiatives such as personalized learning and automotive and mechanic club. (page e34)

Charter schools designated as alternative schools commit to several requirements listed on page e35. Some of the conditions are as follows: 1) serve students who are at-risk of failing high school; 2) a teacher to student ration that accelerates student learning; 3) teachers must have a track-record of success in working with the student population; 4) measurable goals, and 5) counseling and other support services.

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 state requires its authorizers to create and implement best practices in charter school authorization. This year, the State Board of Education voted and adopted charter authorizing standards endorsed by the National Association of Charter School Authorizers. The protocols apply to the state and its charter authorizers. (page e37)

The state's department of education developed a standard based new charter application rubric for charter authorizers. Further, charter schools are held accountable to adhere to the state's pre-approval school opening prerequisites. If the charter school does not meet the requirements, the school's opening may be delayed. (page e38 to e39).

The OPSRC is working with NACSA to create an evaluative tool that is aligned to high-quality authorizing standards. (page e39)

Weaknesses:

No weaknesses noted.

Reader's Score: 5

Status: Submitted
Last Updated: 06/26/2017 12:45 PM

Status: Submitted

Last Updated: 06/26/2017 12:45 PM

Technical Review Coversheet

Applicant: Oklahoma Public School Resource Center, Inc. (U282A170021)

Reader #3: *****

	Points Possible	Points Scored
Questions		
Selection criteria		
Flexibility		
1. Flexibility	10	10
Sub Total	10	10
Selection Criteria		
Objectives		
1. Objectives	15	10
Quality of Eligible Subgrant Applicants		
1. Quality of Subgrant	15	14
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	9
Sub Total	90	69
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	1
Sub Total	2	1

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	1
Sub Total	2	1

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	101
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Technical Review Form

Panel #20 - Panel 20 - Oklahoma - 1: 84.282A

Reader #3: *****

Applicant: Oklahoma Public School Resource Center, Inc. (U282A170021)

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 applicants clearly states that the Oklahoma charter school statute 70 O.S. 3-136(a)(5) exempts charter schools from all rules related to traditional public schools unless explicitly required. This statute's implications span all major areas of charter school operations providing charters with significant flexibility in spending, hiring, professional development, academic instruction, and scheduling. Flexibility also extends to governance; the only requirement for charter boards is that the majority of board members live in the district in which the charter is located. The Oklahoma Public School Resource Center (OPSRC) is committed to providing technical assistance to charter schools on flexibility so they understand their options under the law. Current technical assistance focuses on five areas: legal, finance, technology, communications, and teaching & learning. OPSRC has requested funds to expand this effort if granted a CSP award. (p. e41-43)

Weaknesses:

No weaknesses identified.

Reader's Score: 10

Selection Criteria - Objectives

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

Strengths:

All three objectives are clearly written and sound, though some are more ambitious than others. The first objective is ambitious as the applicant states that it will add up to 25 charter schools in five years. This would result in the charter sector in Oklahoma growing by more than 60% as there are currently 39 charters in the state (p.e72). Legislation passed in 2015 made this expansion more feasible as charter schools can now be developed in all 77 school districts including rural communities. They had previously been limited to the state's two largest cities. (p.e44-e45)

Weaknesses:

For the second objective, the applicant provides data to show that "home-grown" charter schools are capable of strong student outcomes. However, the data is incomplete. The applicant lists the number of charter schools receiving an A or B on the state's report card (10 charter schools), but it does not state what percent this is of the total schools earning an A or B nor does it compare this accomplishment to traditional public schools. Without that missing data, the statement has little meaning. (p.e45-e46)

The third objective - to disseminate best practices - is the least detailed. Though the applicant states two performance measures for this objective neither is very ambitious. One goal is to post five best practices on the OPSRC website and the other is to host as "lessons learned conference" at the end of the year. There are little to no details provided about the

type of “deliverable,” timing for release, or how the OPSRC will ensure that the best practices make a broad and lasting impact (i.e. whether or not subgrantees will be required to use the deliverables). (p.e73-e74)

Reader's Score: 10

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 has taken several steps to ensure that the subgrantees are of high quality. The Oklahoma Public School Resource Center (OPSRC) created a toolkit for potential subgrantees to use in the preparation of their application to ensure that they have adequately addressed each section and will be primed for approval. In addition to the self-paced toolkit, OPSRC will offer three in-person and two online information sessions to review the grant opportunity and application requirements with potential applicants. In fact, OPSRC already identified partners who they believe have the potential to be high-quality subgrantees. In addition to current operators in Oklahoma, partners may be organizations specializing in rural schools, charter schools serving Native American communities, and successful high schools. (p.e47-e49)

Weaknesses:

OPSRC highlights four potential partner organizations who they plan to work with to submit high-quality subgrantee applications. However, two of the potential are relatively new and therefore are unproven in Oklahoma. The Advance Rural Education only opened in 2016, and High Tech High will host its first fellow from Oklahoma this year. Further, it is unclear what specific support OPSRC will give the fellow from High Tech High in preparing an application and ultimately opening a school. (p.e47-e48)

Reader's Score: 14

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 Oklahoma Public School Resource Center (OPSRC) provides a clear plan for the personnel in charge of monitoring. A two-person team, led by a veteran charter school leader, will be responsible for administering all aspects of the CSP grant competition including the selection, management, and monitoring components. (p.e49-e56) One key component of monitoring will be the purchase of Epicenter, a performance management system specifically designed for charter schools that will provide oversight while minimizing duplication with the State Department of Education's (SDOE) data collection efforts. (p.e52)

Earlier this year, the SDOE adopted the National Alliance of Charter School Authorizer's (NACSA) principles and standards for quality authorizing. Building off that partnership, OPSRC will work with NACSA to provide technical assistance to state authorizers through the Charter Authorizer Resources page on the OPSRC website and convene

quarterly charter school authorizer meetings. (p.e55-e56)

Weaknesses:

The applicant does not provide an overview of what monitoring activities they will use to analyze subgrantees performance. They state that subgrantees will submit fiscal and programmatic reports, but they do not provide any details about the frequency or content of such reporting requirements.

Further, the applicant states that it's team will work with charter authorizers and the ODOE to develop oversight procedures that minimize duplicative data collection practices. However, there is no evidence that the ODOE will agree to this collaboration or an alteration of their practices, if recommended.

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 Oklahoma Charter School Act requires new charter school applications to demonstrate parent and community support for the school through a survey, petition, or alternative method of the school's choice. In preparation for this competition, the applicant formed partnerships with seven community organizations that OPSRC plans to collaborate with for promoting parent and community engagement. The aim of these partnerships is to educate various communities about charter schools and the opportunities afforded by the CSP grant while simultaneously soliciting feedback about the positives or concerns associated with charter school implementation in their community. The goals of this information gathering are to help the Oklahoma Public School Resource Center (OPSRC) learn of potential areas for improvement in the sector and to identify new locations for charter schools and new implementation partners. (p.e56-e59)

Weaknesses:

Although the applicant provides adequate detail about their methods of data collection, it is unclear how OPSRC will use the information to make necessary changes at the macro (i.e. charter sector) level or the individual school level.

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 proposal demonstrates an application review process that should yield high-quality subgrantees in two primary categories: current high-performing charters primed for replication and new charters. Applicants will have to prove past success if they are current operators or how their model is grounded in best practices if they are new operators. (p.e59-e65)

The applicant outlines a peer review process, which utilizes a three-person review team panel. In the initial phase of review, the panel will vet subgrantees to ensure that they meet all criteria and disqualify any applications that do not, including virtual schools as the competition is only open to brick-and-mortar schools. In the second phase, each reviewer will use a scoring rubric described on p.e64-e65. In order to ensure that the subgrantees serve at-risk students, there are three priority areas: 1) students with disabilities and ELLs, 2) underserved minority subgroups, and 3) students who live in high-poverty neighborhoods. (p.e65).

The applicant anticipates awarding up to 25 subgrantees with a maximum of five per year for five years (p.e65-e66). The Oklahoma Public School Resource Center (OPSRC) anticipates that they will have a sufficient number of applicants for a robust competition each year. They identified 12 high-performing charters who have not yet replicated but who have waitlists indicating demand. Additionally, the revised version of the Oklahoma Charter School Act of 2015 made charters development possible in all 77 counties, the majority of which have yet to house a charter. (p.e60)

Weaknesses:

Though a month-by-month timeline is provided for the application process, it does not include at what point in the year authorizers make decisions on charter applications. It is unclear if the proposed subgrantee application timeline is aligned with the timeframe for opening a new or replicated school based on when charters are issued. (p.e64)

The application does not address how OPSRC will support subgrantees after their award is over in year two. According to the year-by-year estimate, each subgrant is for two years: one for planning (\$150,000) and one for implementation (\$450,000). The application does not include reasoning for either of those amounts (p.e65) Further, the application does not explain what OPSRC will do with the funds if they do not award all five grants each year of the grant. (p. e182-193)

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 logic model that adequately addresses the Oklahoma Pubic School Resource Center's (OPSRC) strategy for using charter schools to improve educations outcomes for students. The logic model is aligned with the three objectives and supported by a narrative that details the activities that OPSRC will implement in pursuit of each one (p.e69-

e72). The logic model is also aligned with the corresponding performance measures.

Weaknesses:

The performance measures for objective 2 state that “Overall Student Proficiency Index score in reading and math will increase each year” and “Overall Student Proficiency Index score for bottom quartile of charter students in reading and math will improve each year.” Though baseline data is provided, a quantifiable number is not provided as a target. Without this quantifiable goal, it is impossible to discern how the Oklahoma Public School Resource Center will know if it is successful. (p.e73)

The applicant does not outline the specific responsibilities of each member of the management team, and only two resumes are provided. (p.e79-e83)

The management plan does not include milestones or a timeline for accomplishing project tasks. (p.e69-e75)

Reader's Score: 9

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 demonstrates how the Oklahoma Public School Resource Center (OPSRC) meets the criteria set forth in this Competitive Preference Priority. The Oklahoma Charter School Act of 2015 requires that charter authorizers review all schools on an annual basis. These reviews analyze academic and operational performance against the indicators and metrics set forth in the school's charter. These annual reviews are combined with a more extensive review prior to the beginning of the last year of the school's current contract. The State Board of Education is mandated to close any school that falls within the bottom 5% of performance within a three-year period as determined by the state accountability framework. (p.e20-e23)

Weaknesses:

The applicant states “the State Board of Education (SBOE) is required to identify charter schools in the state that are ranked in the bottom five percent (5%) of all public schools.....If a charter school is identified within that five percent (5%) of schools over the course of three (3) years, an authorizer shall close the charter school.” It is unclear if the SBOE is obligated to close a school if it falls within the 5% for three consecutive years or once in a three-year term. (p.e22)

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 demonstrates how the Oklahoma Public School Resource Center (OPSRC) meets the criteria set forth in this Competitive Preference Priority. The Oklahoma Charter School Act of 1999 requires that each charter school operate under a legally binding contract between the school and its authorizer. The initial contract is issued for a five-year term and renewal may vary from one to more than five years. The Act mandates that the authorizer terminate a contract if a school fails to meet the requirements for overall and/or subgroup academic performance set forth in the contract. The Act also mandates that the school complete a financial audit annually. (p.e23-e28)

Weaknesses:

Though the Act requires authorizers to consider overall and subgroup academic performance when deciding if a contract should be renewed or revoked, the applicant does not explicitly state that improved academic achievement is one the most important factors in a renewal decision.

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:

Oklahoma has a robust offering of charter school authorizers including institutes of higher education, Native American Tribes, career and technical centers, and the Office of Juvenile Affairs in collaboration with the State Board of Education. All appeals, regardless of which entity that initial charter was submitted to and denied by, are presented to the State Department of Education. (p.e28-e29)

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:

Charter schools in Oklahoma receive the same amount of funding per pupil minus 5% of the State Aid allocated per 70 O. S. 3-143. The 5% is charged as an administrative fee by the school district or other authorizer such as the State Board of Education, Indian tribe, etc. All funds are distributed to charters at the same time as traditional schools. Further, the SBOE provides training to all charter schools on state and federal funding eligibility so they are aware of all opportunities. (p.e29-e30)

Weaknesses:

Despite equitable funding being given to each charter school by the state, charters do not have the same amounts of funds as traditional public schools because the district or the authorizing body can take up to 5% in administrative fees.

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:

Oklahoma provides targeted assistance to charter schools in accessing and affording facilities. Charter schools are allowed to access to public school facilities and qualify for government lease rates if accepted by private companies. Charters are also often rented public school facilities at below market costs by school districts though they do not have a right of first refusal. (p.e31-e32)

Weaknesses:

The ways in which Oklahoma eases charter school facility challenges are limited.

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 identified student discipline as an area in need of significant improvement. Data shows that minority and ELL students are disciplined at much higher rates than Caucasian students. The Oklahoma Public School Resource Center (OPSRC) will make a concerted effort to disseminate best practice research on this topic, work with the Oklahoma State Department of Education (OSDE) to implement an equity plan, and add questions on student discipline into the school climate survey. (p. e32-e34)

The applicant also details a new macro-level approach led by the State Superintendent of Public Instruction. She uses a collection of advisory councils with a cross-section of members from all stakeholder groups to explore how changes to state law could improve student achievement. (p.e33)

Weaknesses:

The applicant does not demonstrate how the practices explained are best practices from the charter school sector. The applicant does not provide a systematic approach to disseminating best practices, and detail regarding the focus or frequency of professional development conferences and white papers is limited.

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:

Oklahoma's commitment to serving at-risk students is grounded in the Oklahoma Charter School Act, which requires authorizers to give priority preference to new school applications that vow to serve at risk students or those who would otherwise attend a failing public school. The Act also gives preferential treatment in admissions to students whose school is deemed "in need of improvement," and it provides schools located in areas where 60% or more of students qualify for free and reduced lunch with the opportunity to limit admissions to those in the surrounding neighborhood. (p.e35)

Additionally, certain schools that serve at-risk students may be designated as alternative schools. This designation enables the schools to receive supplementary funding and be evaluated by a specialized rubric that accounts for the unique challenges associated with serving an at-risk population. (p.e35-e36)

Weaknesses:

No weaknesses identified.

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 Oklahoma State Board of Education (SBOE) employs several best practices in charter school authorizing. Most recently, the SBOE adopted the National Association of Charter School Authorizer's (NACSA) charter authorizer principles and standards for itself and all authorizers in the state in January 2017. The State Board of Education (SBOE) also offers multiple tools and significant guidance for authorizers including a list of pre-opening requirements to be included in all charter contracts, a list of priorities that authorizers must consider when scoring charter applications, and a set of requirements set forth by the Charter School Act that all charter must meet in order to be approved. The SBOE also provides an application rubric for charter authorizers to use during charter reviews and a newly customized evaluation framework for ongoing monitoring. (p.e36-e41)

Weaknesses:

As a result of the SBOE's adoption of NACSA's charter authorizer principles and standards, OPSRC partnered with NACASA to develop several best practice tools for Oklahoma authorizers. Besides stating that OPSRC shares information about these authorizer best practice tools on its website, the applicant does not demonstrate how the OPSRC trains its multiple authorizers on these practices.

Reader's Score: 4

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