

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

Status: Submitted

Last Updated: 06/26/2017 12:42 PM

Technical Review Coversheet

Applicant: WI Department of Public Instruction (U282A170002)

Reader #1: *****

	Points Possible	Points Scored
Questions		
Selection criteria		
Flexibility		
1. Flexibility	10	9
Sub Total	10	9
Selection Criteria		
Objectives		
1. Objectives	15	15
Quality of Eligible Subgrant Applicants		
1. Quality of Subgrant	15	14
State Plan		
1. State Plan	20	20
Parent and Community Involvement		
1. Involvement	10	9
Quality of Project Design		
1. Project Design	15	14
Quality of the Management Plan, Theory of Action		
1. Management Plan	15	14
Sub Total	90	86
Priority Questions		
Competitive Preference Priority 1		
Periodic Review and Evaluation		
1. Review and Evaluation	5	5
Sub Total	5	5
Competitive Preference Priority 2		
Charter School Oversight		
1. Charter School Oversight	5	5
Sub Total	5	5
Competitive Preference Priority 3		
Authorizer other than LEA or Appeal Process		
1. Authorizer other than LEA	2	2
Sub Total	2	2

Competitive Preference Priority 4

Equitable Financing

1. Equitable Financing	2	2
Sub Total	2	2

Competitive Preference Priority 5

Charter School Facilities

1. Charter School Facilities	2	1
Sub Total	2	1

Competitive Preference Priority 6

Best Practices to Improve Struggling Schools/LEAs

1. Struggling Schools	2	1
Sub Total	2	1

Competitive Preference Priority 7

Serving At-Risk Students

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

Competitive Preference Priority 8

Best Practices for Charter School Authorizing

1. Best Practices	5	5
Sub Total	5	5

Total	125	117
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Technical Review Form

Panel #16 - Panel 16 -Wisconsin - 1: 84.282A

Reader #1: *****

Applicant: WI Department of Public Instruction (U282A170002)

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 applicant presents comprehensive documentation that the state of Wisconsin affords charter schools significant flexibility in several key areas. Wisconsin charter schools have flexibility in determining curriculum, professional development, staffing, school calendar, and organizational structure. Charter schools are also provided flexibility in their governance structures. The Wisconsin Charter Schools Program (WCSP) specifies that sub grantees will demonstrate, in their applications, how their charter schools will actualize the flexibilities afforded by State law. The WCSP supports the autonomies granted to charter school governing boards under the law and will require all subgrantees to: (1) demonstrate in their subgrant application the school's autonomy and independence; (2) provide proof of registration as a separate non-stock corporation to ensure independence in governance structure and policy and procedure development; and (3) develop a five-year budget to ensure fiscal independence and sustainability (p. e30).

Weaknesses:

According to the application charter schools are only subject to eight non-charter school specific educational requirements, however, only four requirements are listed. More details of the four requirements that are not listed (p. e28, para. 2) would have provided a deeper understanding of the requirements that charter schools must follow.

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 ambitiousness of the applicant's objectives as stated in the application will support the development of quality charter school programs throughout the State. The well-developed and ambitious objectives seek to support subgrantees and existing charter schools throughout Wisconsin. The objectives seek: (1) Supporting the Growth of High Quality Charter Schools; (2) Strengthening Authorizer Quality; and (3) Promoting Collaboration and Best Practices (p. e36-e37).

To support the growth of high quality charter schools, subgrantees will be required to commit to the objectives and specific activities as a part of their grant participation. Applicants must identify how their charter school will pursue at least two of the following: (1) increase access to educationally disadvantaged students; (2) reduce and eliminate the achievement gap

for educationally disadvantaged students; (3) serve students at-risk of dropping out or who have previously dropped out; (4) increase the overall graduation rate; or (5) increase career and college readiness (p. e34). In addition, all subgrant applicants must describe: (1) how the school plans to attract, recruit, admit, enroll, serve and retain educationally disadvantaged students equitably and meaningfully; (2) how proposed activities will lead to improved student academic achievement and employ evidence-based research and data; and (3) how the charter school program will meet the educational needs of students, including children with disabilities and English learners. Subgrant applicants must also submit a five-year budget and a detailed plan for how the school will sustain operations beyond the grant period (p. e34).

In the section covering the second objective, Strengthening Authorizer Quality, the applicant outlines three main activities each aimed at developing and supporting authorizer quality. To assist authorizers in reviewing and evaluating their charter school portfolio, DPI will support charters as to develop accountability reports. Several tools and resources will be made available to subgrantees such as: an updated contract benchmark document to aid in the development of strong contracts; an opening and closing checklist to facilitate opening and closing processes; a webpage with information exclusively for authorizers; a model charter school application, and contract template.

The objective to promote collaboration and best practices demonstrates the Wisconsin Charter Schools Program (WCSP) and Wisconsin Public Instruction investment in the success of future grantees as well as the current charters. The applicant details each objective and further lists well-defined activities to execute for each goal.

The WCSP will promote collaboration and best practice sharing by: (a) requiring subgrantees and encouraging all other charter schools to utilize the DPI's Promoting Excellence for All (PEFA) eCourse as a professional development tool; (b) organizing conferences and workshops to showcase high-quality charter schools and their practices; (c) developing mentorships between high-quality and start-up charter schools; and (d) developing and implementing a statewide dissemination strategy for best practices (e39-e42).

The objectives, with supporting activities, provide sound and feasible evidence that the State has created a well-developed system of supports to benefit charter schools and their students. The objectives are closely aligned to the quality of the project design. There is a prevalent theme of the three objectives are woven throughout the application and clearly articulated.

Weaknesses:

No identified weaknesses.

Reader's Score: 15

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 state justifies the likelihood that eligible subgrant recipients will be of high quality. The approach presented by the applicant describes how Wisconsin Charter Schools Program (WCSP) will provide the extensive technical assistance required for eligible applicants, authorizers, and charter school governance boards. The applicant describes a rigorous subgrant application processes and requirements. This application process will support subgrantees to develop, replicate, and expand high-quality charter schools that improve educational outcomes for all students, especially educationally disadvantaged students. In addition, subgrantees will have opportunities to establish collaborative partnerships and share best practices throughout the state (p. e40).

The applicant provided evidence that the WCSP works with potential grantees before they apply for the grant. WCSP offers comprehensive technical support for potential applicants. Technical assistance is also provided to authorizers to

improve the authorizing process. In addition, WCSP will collaborate with partners to implement the Charter School Board Development Program. This proposed program will provide support to any charter school board seeking governance and leadership assistance and training (p. e43).

Weaknesses:

The definition of high quality charter schools is missing and the connection between the risk assessment as an indicator for high quality (p. e46) is not clear. Neither the risk assessment nor the definition of high quality charter schools is included in the application. Including an example of the risk assessment would be helpful to describe how Wisconsin uses the risk assessment to improve the quality of eligibility of subgrantees. The application does not include the monitoring protocol cited as a component to ensure a subgrantee's authorizer is appropriately overseeing the school (p. e45).

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 outlines a convincing state plan that describes the Wisconsin Charter School Program (WCSP) and Department of Public Instruction (DPI) are working in tandem to monitor grant recipients in a comprehensive and logical process. The State is conscious of avoiding duplication of work on the part of the grant recipients. Monitoring occurs prior to awarding subgrants to eligible applicants and during the grant period (p. e45). Further, charter authorizers must submit annual reports to the DPI and the legislature detailing academic and financial performance for each charter school in its portfolio. The WCSP staff will use information from the report to monitor and assist schools and authorizers in improvement planning (p. e46). Technical assistance for the application begins before the grants are awarded. The DPI and WCSP work in partnership to provide effective ongoing technical assistance to charter schools throughout the state. The applicant outlines in detail seven state partners that support technical assistance efforts.

Throughout the years there is evidence that the State has scaled up its capacity to provide support to quality charter schools. The plan is ambitious, yet the State has clearly developed capacity in this area to carry out and fulfill the plan put forth by the state. The plan outlined in the narrative aligns to the objectives. The activities to support each objective are clearly described in the plan (p. e31).

Weaknesses:

No identified weaknesses.

Reader's Score: 20

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 plans to involve parents and community members at several levels of the charter school governance system. The intent is to provide parents and community members with seats on school and state-level governance boards. The applicant describes that each charter school is required to involve parents and community members on their school governance boards to gather input from parents and community members at large. All subgrant applicants must provide a statement assuring they will provide equitable access to, and participation in, each program included addressing special needs of students, teachers, and other program beneficiaries to overcome barriers based on gender, race, color, national origin, limited English proficiency, disability and age (p. e12 and p. e34). Wisconsin sets forth a unique way of involving parents to solicit input on charter school implementation and operation through its plan for parent and community involvement by inviting a parent representative to serve on the State Superintendent's Advisory Council for Charter Schools (SSACCS).

In addition, Wisconsin will integrate parental and community input within the subgrant process through application materials, review procedures, and monitoring (p. e55).

Weaknesses:

The applicant uses parent and community representation on governance boards as the sole vehicle for involving parent and community members. The applicant should consider other vehicles that reach parent and community in rural areas to solicit and consider input on the implementation and operation of charter schools on the local level.

Reader's Score: 9

Selection Criteria - Quality of Project Design

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

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

Strengths:

The applicant presents a well-developed project design that is clear, aligned with the state plan and objectives by indicating its previous experience with Charter School Program (CSP) funding. Furthermore, the current application presents a well-constructed and fiscally sound process for increasing the number of high quality charter school with a focus on improving student achievement. The estimated number of awards the applicant plans to distribute is reasonable. The plan also includes support and assistance to subgrantees after the subgrant period concludes and also states it will continuously provide support to non-grantees. Both aspects insure sustainability and growth of charter schools across the state.

The subgrant process outlined in application is rigorous as it includes multiple levels of review and support through comprehensive technical assistance with an emphasis on improving state-wide authorizing practices. The Wisconsin

Charter School Program (CSP) will use a quality external peer review process to assess applications since grants are reviewed by educators, school district administrators, charter developers, charter school board members, and other experts with charter and alternative school expertise (p. e62).

The applicant intends to fund approximately 80 new or replicated and 27 expanded high-quality charter schools. Projections rely on the following data from Wisconsin's previous CSP grant: (a) average annual number of new charter schools (20); (b) average annual number of new secondary charter schools (70% of new schools included secondary grades 7-12); (c) percentage of new charter schools receiving a federal charter school grant (75%); and (d) average award paid for each type of grant adjusted for a five year grant period rather than a two-year implementation grant period (p. e65).

Weaknesses:

The overall estimates of projected schools vary in two places in the grant (p. e32 and p. e65). The application narrative needs to clarify the projected charter schools (n=80 and expansion n=27) on page e32 versus the table on e65.

The high school expansion plan lacks details in the application. There is no justification in the application of focusing on the high school expansion grant (p. e32). The strategy for justification is obscure. The application states on p. e34, "During the award phase of the process, additional funding may be provided to subgrantees with sustainable plans focused on improving outcomes for educationally disadvantaged high school students" and high school subgrantees may receive additional funding, but the application fails to address how high school charter school applicants will be supported in the application and technical assistance processes.

Reader's Score: 14

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 includes a logic model to address the role of the grant as a primary vehicle to actualize the State's comprehensive state level strategy for using charter schools to improve outcomes for students. The objectives of the grant are clearly reflected in the plan and there is alignment between the objectives and activities. The Logic Model further defines data collection and reporting methods. Several tools and resources are used to support the performance target defined in the Logic Model. For example, the Wisconsin Information System for Education (WISE) data dashboard provides school level data to monitor charter school progress. Report cards provide data in four academic priority areas disaggregated by subgroups: (1) student achievement, (2) student growth, (3) closing gaps, and (4) on-track and post-secondary readiness (p. e67).

The Project Specific Performance Measures, outlined on pages e68-e76, identify, in significant detail, the Objectives (p. e31) and corresponding performance measure, performance target, baseline data, milestone, and reporting method. Project Specific Performance Measures clearly support the logic model and the budget presented on pages e253-e262 since each aspect of the model is reflected in each of the inputs, outputs, and outcomes. The timelines and budget, defined responsibility, and milestones for accomplishing project tasks are well-aligned to the proposed project objectives. The logic model addresses the role of the grant in promoting state-level strategies for using charter schools to improve educational outcomes for students and reflects the defined objectives of the grant application (p. e68).

Weaknesses:

The applicant does not address any compliance issues or finding related to Charter School Program that may be identified in an audit or other monitoring review. The applicant fails to include details in the management plan as to how it will address the compliance issues from an audit.

Reader's Score: 14

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 State of Wisconsin provides for annual reviews and charter renewals every five years. On an annual basis, authorizers work closely with charter schools to monitor and evaluate the academic achievement and growth of charter schools, fiscal responsibilities and compliance (p. e23). Over the last four years, charter school authorizers in the state have closed 86 charter schools and Wisconsin Charter School law empowers authorizers and the DPI to close underperforming charters for not meeting minimum criteria clearly defined in their charters (p. e21, para. 2). Every year the Wisconsin Department of Education monitors charter schools to ensure school level performance (p. e198). The purpose of these site visits is to determine how well the charter schools are fiscally accountable, governance, program implementation, and performance targets. The state has designed a comprehensive performance accountability and compliance monitoring system that is used at least every five years in addition to the ongoing performance monitoring. Renewal/revocation decisions are defined (p. e23-24).

Weaknesses:

No identified weaknesses.

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 documents multiple layers, charter contract and annual independent audits of charter school oversight in the State (p.e21-e23). Charter schools and authorizers are monitored and subject to public reporting of their performance. Charter school authorizers must monitor the performance of each charter school and its compliance with state charter laws, evaluate whether their schools meet contractual terms, and submit an annual report to the legislature and state superintendent detailing the academic performance of each school it authorizes (p. e23). DPI publishes report cards of each school's progress. Authorizers monitor each charter school's progress and they report to the state superintendent and legislature, who hold them accountable (p. e23). Authorizers have statutory authority to take appropriate action and impose meaningful consequences on schools that do not meet identified performance standards (p. e21).

Weaknesses:

No identified weaknesses.

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 State of Wisconsin grants chartering authority to multiple authorizers across the state. These authorizers are not LEAs, but 97 school boards, two universities, and one municipal government chartered 237 schools (p.e24).

Weaknesses:

No identified weaknesses.

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:

Independently authorized charter schools receive state funding directly from the Wisconsin Department of Public Instruction (DPI) on a current year per pupil basis. "Wisconsin ensures prompt and equitable financing for all charter schools. The DPI ensures charter school access to federal programs, as well as state special education, transportation, and school lunch aid programs. Independently authorized charter schools receive State funding directly from the DPI on a current year per pupil basis. These charter schools participate in federal programs in a manner consistent with traditional public school districts and are eligible to receive the aforementioned state aid. The DPI administers state and federal funding to school board authorized charter schools using the same processes as traditional public schools: students attending these schools, as well as qualifying services for students, factor into state and federal funding formulas" (p. e24).

Weaknesses:

The applicant needs to include how charter schools are allocated funding from the state and how that funding differs from traditional school funding. The words 'promptly' (para. 2) and 'significant' (para. 3) as used on pg. 24 lack clarity.

Reader's Score: 2

Competitive Preference Priority 5 - Charter School Facilities

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

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

Strengths:

The Wisconsin State Legislature provides support to Milwaukee Charter Schools. Milwaukee Charter Schools have access to public facilities and right of first refusal to purchase school buildings (p. e25).

Weaknesses:

With the exception of Milwaukee, the applicant does not demonstrate the extent to which the State provides support, leasing privileges, or other assistance to charter schools throughout the rest of the Wisconsin in their efforts to acquire facilities (p. e25).

Reader's Score: 1

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

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

Strengths:

The applicant demonstrates that it has committed to improving struggling schools by gathering and communicating best practices to improve schools. The State maintains a publicly available website (p. e26) that serves as a repository for best practices that support student learning and provide proven school-level practices that foster growth in struggling schools. A commitment to best practices is woven into the State's mission and current task force (p. e25) to improve all schools in Wisconsin.

Weaknesses:

Aside from the on-line portal, the application does not identify other efforts to use best practices to improve struggling schools nor does it cite specific evidence that the on-line tool has supported struggling schools. The application would be strengthened if multiple examples of best practices were cited.

The only schools that are struggling are assumed to be schools with racial disparities. "Educators and leaders, including charter school leaders, identified proven strategies from their own schools for closing race-based achievement gaps" (p. e25). The applicant fails to address how achievement gaps in the state that are caused by other factors than race-based achievement gaps are addressed.

Reader's Score: 1

Competitive Preference Priority 7 - Serving At-Risk Students

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

Strengths:

State law requires authorizers to give preference in awarding charter contracts to schools that serve students identified as at-risk. Charter school applicants must describe in detail their plan for supporting and educating at-risk students (p. e26). This demonstrates that the applicant supports charter schools that serve at-risk students. In addition, the State provides other considerations such as alternative accountability and growth measures for schools that serve at-risk students that include charter schools.

Weaknesses:

Although the applicant mentions the State's requirement of subgrant applicants to describe how the charter schools will: reduce or eliminate achievement gaps for educationally disadvantaged students, serve students at-risk of dropping out, increase graduation rates, or increase college and career readiness for its students, the applicant does not describe fully the extent to which it supports charter schools that serve at-risk students.

In addition, the application states: "Statewide, over 50 schools self-identified as serving solely at-risk students, with charter schools accounting for more than 30%" (p. e26). According to this percentage, approximately 16 charter schools in the state of the out of 237 charter schools serve solely at-risk students. A further explanation of how the State intends to increase the number of schools that serve at-risk students, particularly on the high school level, is needed.

Reader's Score: 1

Competitive Preference Priority 8 - Best Practices for Charter School Authorizing

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

Strengths:

The applicant presents evidence that the State has taken steps to ensure all authorized public chartering agencies implement best practices for charter school authorizing. The State adheres to National Association for Charter School Authorizers (NACSA) best practices and only approves high quality applicants. The subgrant application (p. e149) and checklist for opening schools (p. e233) is included in the application. The applicant also includes best practices for closure (p. e233-235).

The applicant presents a strategic and well-designed vision for continually educating and supporting its authorizers in their efforts to apply best practices for charter school authorizing.

Weaknesses:

No identified weaknesses.

Reader's Score: 5

Status: Submitted
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Applicant: WI Department of Public Instruction (U282A170002)

Reader #2: *****

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Quality of Eligible Subgrant Applicants		
1. Quality of Subgrant	15	14
State Plan		
1. State Plan	20	20
Parent and Community Involvement		
1. Involvement	10	10
Quality of Project Design		
1. Project Design	15	14
Quality of the Management Plan, Theory of Action		
1. Management Plan	15	13
Sub Total	90	86
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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	1
Sub Total	2	1

Competitive Preference Priority 4

Equitable Financing

1. Equitable Financing	2	1
Sub Total	2	1

Competitive Preference Priority 5

Charter School Facilities

1. Charter School Facilities	2	1
Sub Total	2	1

Competitive Preference Priority 6

Best Practices to Improve Struggling Schools/LEAs

1. Struggling Schools	2	1
Sub Total	2	1

Competitive Preference Priority 7

Serving At-Risk Students

1. Serving At-Risk Students	2	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	117
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Technical Review Form

Panel #16 - Panel 16 -Wisconsin - 1: 84.282A

Reader #2: *****

Applicant: WI Department of Public Instruction (U282A170002)

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:

This criterion is satisfactorily met; Wisconsin law exempts charter schools from the statutory requirements for K-12 education (pg. e28). Charter schools are only subject to eight non-charter specific educational requirements that relate to administering assessments, adopting academic standards, reporting academic performance and ensuring quality teachers (pg. e28). Wisconsin law does not limit the number of charter schools or the number of students attending charter schools (pg. e29). The State also allows flexibility in charter school organizational structure (pg. e29). The State requires that subgrantees must explain in their applications how they will take advantage of the flexibility permitted under law; this sufficiently demonstrates that the State will work to maximize the flexibility provided to charter schools (pg. e30).

Weaknesses:

No identified weaknesses

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 State seeks to increase and improve both the quality and quantity of charter schools through three related objectives: increasing the statewide graduation rate; closing graduation and college and career readiness gaps; and making school finance more equitable and transparent (p. 31). The State demonstrates that each of these objectives is feasible. The State seeks to support new, replicated or high-quality charter schools by supporting the growth of high-quality charter schools, strengthening and improving authorizing quality; promoting and supporting collaboration, and sharing of best practices among high-quality schools and other schools in the state (pg. 31). These objectives are ambitious, clearly thought out and well developed.

Weaknesses:

No identified weaknesses

Reader's Score: 15

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 State demonstrates that this criteria is mostly met by connecting its plan to develop and provide extensive training and technical assistance to eligible applicants before an application is submitted (pg. e41). The State will also provide training and technical assistance to authorizers prior to grant submission to ensure best practices in authorizing (pg. e42). All applicants must provide a fully executed charter contract or a resolution from the authorizer indicating that the charter has been reviewed if the contract has not been finalized (pg. e43). Applicants must also explain their mission and identify goals and project objectives that demonstrate how the school will increase student achievement (pg. e43). The subgrant application requirements work to ensure that the subgrantees are high quality and will provide demonstrable education results for students.

Weaknesses:

The CSP application does not fully explain how the components of the risk assessment function prior to the grant award and how the risk assessment ensures high quality schools (pg. e36).

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 State requires monitoring prior to and during the grant period through a detailed training schedule (pg. e45). The State requires charter authorizers to submit detailed annual reports to the State identifying academic and charter performance for each charter school (pg. e46). The State has a comprehensive plan to minimize duplication among authorizers through notice relating to the grant requirements and allowing subgrantees to use information from the authorizer's annual reviews to fulfill certain monitoring requirements. The State also requires charter schools to have programmatic reviews and audits (pg. e49). The State includes a comprehensive technical training assistance plan to provide assistance to all charter schools and authorizers in the State (pg. e49).

The plan's goals are clearly articulated and feasible.

Weaknesses:

No identified weaknesses

Reader's Score: 20

Selection Criteria - Parent and Community Involvement

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

Strengths:

The State adequately satisfies this requirement. The State will solicit and consider input from parents and the community (at several levels of the governance system) through dissemination of the application materials, and review of procedures and monitoring activities (pg. e55). The State also plans to strengthen parent and community involvement by developing parental and community representation on charter school boards through a Charter School Board Development Program that trains and provides resources to prospective charter school members (pg. e57).

Weaknesses:

The State indicated that parent participation is primarily limited to representation on charter school governing boards. The State fails to consider adding additional methods of representation outside of representation on charter school boards particularly in rural areas.

Reader's Score: 10

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 State clearly meets this criteria. The State explains the eligibility and process for grant applications, which is directly tied to the existing process for new students seats (pg. e38). The State has explained adequate processes and guidelines in place to ensure that only high quality providers are permitted to open or expand (pg. e40). All grant applications will be subject to review from an evaluator with evaluation expertise relating to charter schools' academic, fiscal and operational performance (pg. e60). The RFP process has sufficient detail, provides significant feedback to applicants and provides a reasonable time frame for compliance with each requirement (pg. e56-58).

The State clearly outlines the total number of grants it intends to distribute during the five year grant term as well as the amount of subgrants awarded on an annual basis. The State has also identified the grant range of the subgrants (pg.

e66).

Weaknesses:

There are inconsistent estimates of the anticipated number of new schools and expansion and replications of schools throughout the application (pg. e32, e65) that causes confusion about the number of new school grants, school expansion grants and replication school grants the State intends to make if it receives a CSP grant.

Reader's Score: 14

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 management plan clearly aligns the objectives and strategies. The logic model assumptions are well reasoned (p. e62) and it demonstrates a clear understanding of applicable resources, activities, outputs and short, mid and long-range outcomes and fully addresses the objective of providing high quality education options for educationally disadvantaged students (pg. e66). The performance measurers directly align to and support the logic model. The management plan is aligned to achieve the objectives within budget constraints and with clear responsibilities, timetables and milestones (pg. e68-73).

Weaknesses:

Although the State has undergone monitoring of the Wisconsin Charter School Program through WestEd, the State does not clearly indicate that it has implemented a mechanism to address compliance-related findings regarding the Charter School Program that may be identified in future audits or monitoring reviews (pg. e67-68). Performance measure 1(e) and 1(f) measure statewide math and reading assessment percentages for 4th and 8th grade charter school students; the State does not identify how these performance measurers correlate to subgrants targeted at helping open high quality new schools, school expansions or replications (pg. e70).

Reader's Score: 13

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 State sufficiently meets this priority by demonstrating authorizers must annually: monitor the performance of each charter school they authorize and the school's compliance with state charter laws; evaluate whether charter schools meet contract terms, including student academic performance requirements; and report academic and financial performance to the state superintendent and the legislature (pg. e20). The State monitors the submission of the required annual authorizer report to ensure that authorizers meet this requirement (pg. e20). An initial charter and charter school renewal cannot exceed five years (pg. e21). Authorizers have authority to revoke a contract at any time if a school violates its contract, if the school does not comply with generally accepted accounting standards for fiscal management and/or if the school violates a provision of charter school law (pg. e21).

Weaknesses:

No Identified Weaknesses

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 State strongly satisfies this priority by demonstrating that each charter school operates under an agreement with an authorizer that outlines rights and obligations of the charter school that require an accountability plan with school-specific academic and operational goals (pg. e22). The State identifies student achievement as one of the most important factors in determining a renewal or revocation (pg. e23). Each charter school must demonstrate high levels of achievement as outlined in the charter school's accountability plan (pg. e22).

Weaknesses:

No Identified Weaknesses

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:

Although the State explains that it uses the same processes to distribute state and federal aid to charter schools and traditional schools, it does not provide an adequate description of the processes to ensure funds are distributed promptly (pg. e24).

Weaknesses:

Although the State explains that it uses the same processes to distribute state and federal aid to charter schools and traditional schools, it does not provide an adequate description of the processes to ensure funds are distributed promptly (pg. e24).

Reader's Score: 1

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 State provides equitable financing for all charter schools. Charter schools have access to federal programs, as well as state special education, transportation and school aid programs (pg. e24). Wisconsin law permits equitable funding on the same 1:1 per pupil basis as traditional public schools (pg. e24).

Weaknesses:

Although the State explains that it uses the same processes to distribute state and federal aid to charter schools and traditional schools, it does not provide an adequate description of the processes to ensure funds are distributed promptly

(pg. e24).

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 State clearly explains that charter school operators in Milwaukee have access to public facilities and the right of first refusal to purchase public school buildings (pg. e25).

Weaknesses:

The state does not demonstrate that there is charter schools facilities assistance to charter schools located outside of Milwaukee.

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 State's mission indicates a continuous focus on sharing best practices through task forces, workgroups and other projects (pg. e25). The State Superintendent has a task force, Promoting Excellence for All, that focuses on reduction and elimination of persistent race-based achievement gaps by identifying classroom-centered best practices to improve results at struggling schools and LEAs (pg. e25).

Weaknesses:

The State does not identify any charter school-based methods to assist struggling schools

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:

The State addresses this priority because it requires authorizers to give preference in awarding charter contracts to schools that will serve students identified as at-risk (pg. e26). The subgrant application requires the charter school to describe how it will reduce or eliminate achievement gaps for educationally disadvantaged students, increase graduation

rates, and/or increase college and career readiness for its students (pg. e26). The State has developed an alternative accountability process for schools that exclusively serves at-risk students; the process includes charter schools (pg. e26). The alternative accountability process directly correlates to the State's goal of serving at-risk students.

Weaknesses:

No identified weaknesses.

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 addresses this priority because it requires authorizers to give preference in awarding charter contracts to schools that will serve students identified as at-risk (pg. e26). The subgrant application requires the charter school to describe how it will reduce or eliminate achievement gaps for educationally disadvantaged students, increase graduation rates, and/or increase college and career readiness for its students (pg. e26). The State has developed an alternative accountability process for schools that exclusively serves at-risk students; the process includes charter schools (pg. e26). The alternative accountability process directly correlates to the State's goal of serving at-risk students.

Weaknesses:

No identified weaknesses

Reader's Score: 5

Status: Submitted
Last Updated: 06/26/2017 12:42 PM

Status: Submitted

Last Updated: 06/26/2017 12:42 PM

Technical Review Coversheet

Applicant: WI Department of Public Instruction (U282A170002)

Reader #3: *****

	Points Possible	Points Scored
Questions		
Selection criteria		
Flexibility		
1. Flexibility	10	10
Sub Total	10	10
Selection Criteria		
Objectives		
1. Objectives	15	15
Quality of Eligible Subgrant Applicants		
1. Quality of Subgrant	15	13
State Plan		
1. State Plan	20	20
Parent and Community Involvement		
1. Involvement	10	9
Quality of Project Design		
1. Project Design	15	13
Quality of the Management Plan, Theory of Action		
1. Management Plan	15	13
Sub Total	90	83
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	1
Sub Total	2	1

Competitive Preference Priority 7

Serving At-Risk Students

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

Competitive Preference Priority 8

Best Practices for Charter School Authorizing

1. Best Practices	5	4
Sub Total	5	4

Total	125	113
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Technical Review Form

Panel #16 - Panel 16 -Wisconsin - 1: 84.282A

Reader #3: *****

Applicant: WI Department of Public Instruction (U282A170002)

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:

Charter schools in Wisconsin have a fair amount of flexibility afforded by law. The applicant states that Wisconsin legislation "does not limit the geographic location, number of schools, or number of students in charter schools" (p. 10). The variety of authorizers in the state, institutes of higher education and city and government agencies, provides for a great deal of flexibility as charters have at least 7 authorizers to choose from in every part of the state (p. 5 & 10). Further, charter operators in Wisconsin may open more than one campus or school under the same or multiple charter contracts (p. 10). Charter schools are also exempt from all but 8 provisions in the Wisconsin Education Statutes (p.9). The 8 provisions are related to assessment, academic standards, reporting performance, and quality teachers. (p. 9).

Wisconsin Department of Public Instruction (WDPI) supports charter flexibility through technical assistance and resources on their website that help charters understand the flexibility afforded to them (p. 12). The applicant plans to further support the flexibility of charter schools through the CSP grant by requiring subgrantees to demonstrate the school's autonomy and independence (p. 11).

Weaknesses:

No identified weaknesses.

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 clearly articulates objectives that support the overall aim of the CSP grant program, are well-aligned with state priorities, and provide the organizing structure for the quality proposed project. The three objectives aim to support the growth of high quality charter schools (p.13), strengthen authorizer quality (p.18) and promote collaboration and best practices (p. 20). Additionally, the applicant has defined measurable performance targets, in the Management Plan, that clearly align to and support the articulated objectives and are ambitious. For example, under the first objective, the applicant aims to support 80 new or replication schools and 27 expansion subgrants (p. 13); this equates to approximately 25 subgrants per year, a number ambitious in any state.

The applicant identifies effective activities that will enable the attainment of the project objectives.

To support the growth of high quality charter schools, the applicant will engage authorizers in areas of the state without charter schools (p. 13), provide for replication and expansion of existing high quality charter schools (p. 20), ensure a rigorous subgrant process, provide technical assistance and implement a robust monitoring system. (p. 13-17). To

strengthen authorizer quality, Wisconsin legislation requires charter authorizers to “adhere to the NACSA’s Principles and Standards” (p. 8 & 18). WDPI has developed contract benchmarks, open and closing checklists, a model charter school application and contract template (p. 19). With the CSP grant, they intend to develop an Authorizer Development Program (p. 19). To promote collaboration and best practices, WDPI will establish the Wisconsin Resource Center for Charter Schools. The Wisconsin Resource Center for Charter Schools (to be established with CSP funds) will require all charter schools to participate in a eCourse “Promoting Excellence For All”, organize conferences and workshops, facilitate mentorships between high quality and new or struggling charter schools, develop a dissemination plan to include listservs, newsletters, partnership as and the SSACCS.

The applicant’s clear statement of the objectives along with a thorough description of the activities necessary to achieve the objectives provides evidence about the ambition, soundness and feasibility of the applicant to attain the objectives.

Weaknesses:

No identified weaknesses.

Reader’s Score: 15

Selection Criteria - Quality of Eligible Subgrant Applicants

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

Strengths:

The applicant provides adequate evidence regarding the likelihood that subgrantees will meet the stated program objectives. This evidence includes quantitative data indicating that high quality charter schools are operating in Wisconsin. The applicant states that 69.5% of Wisconsin charter schools meet or exceed state performance expectations, and 4 of the top 5, and 10 of the top 25, schools in the state are charter schools (p. 22). Evidence is also found in the CSP application process. A rigorous peer review process, governing board development, risk assessment, technical assistance in the development of the school and grant application, and authorizer development are likely to support the development of high quality charter schools (p. 23- 24).

In addition, subgrant applicants must identify evidence-based models for improving student achievement (p. 25). Existing charter schools that apply for an expansion or replication subgrant must operate schools with proven success, as evidenced by state report cards (p. 25).

Exiting charter schools who apply for a subgrant must operate schools with proven success, as evidenced by state report cards (p. 25).

Weaknesses:

While the stats on the top performing schools are compelling, the applicant does not provide evidence for the claim that Wisconsin charter schools are improving, or likely to improve, student performance. As provided, the data suggests that some charter schools are performing impressively relative to other schools. However, these top performing schools could be serving an advantaged, high-performing student population who score well on tests. It is unclear if Wisconsin is improving educational outcomes based on the information they provided. The applicant failed to include a measure of the growth in the percentage of students deemed proficient at the school-level, a measure of individual student growth, or a measure of achievement gap closure, which would provide more data for an assessment on improving educational outcomes.

Although the subgrant application process supports contributes to the evidence regarding the likelihood to meet program objectives, the lack of detail on some components weakens this evidence. For example, the applicant does not include a

detailed description of the risk assessment or how it functions as the tool for ensuring high quality subgrantees.

Reader's Score: 13

Selection Criteria - State Plan

1. The State entity's plan to--

- 1) Adequately monitor the eligible applicants receiving subgrants under the State entity's program;**
- 2) Work with the authorized public chartering agencies involved to avoid duplication of work for the charter schools and authorized public chartering agencies; and**
- 3) Provide technical assistance and support for--**
 - i. The eligible applicants receiving subgrants under the State entity's program; and**
 - ii. Quality authorizing efforts in the State.**

Strengths:

The applicant provides a well-developed plan for the CSP subgrant program that is robust and feasible. The detailed management plan on pages 49-57 serves as evidence of their capacity to carry out the work proposed in this application.

The applicant has robust plans for monitoring subgrantees, including risk assessment prior to receiving grant funds, desk monitoring, site visits, monthly status calls and required training (p. 26 -28). The applicant has a monitoring protocol designed for the annual assessment of student achievement, financial and operational goals (p. 28). Onsite visits will be conducted at least once at each site during grant cycle (p. 29).

The applicant successfully includes 5 strategies to ensure that duplication of work is avoided (p. 29-30). 1.) subgrantees are subject to Uniform Grant Guidance requirements for CSP subgrants and for other federal programs, which avoids the duplication of creating policies and procedures. 2.) information from the authorizer annual report may be used for CSP subgrant monitoring, including student achievement and financial data. 3.) annual fiscal audits required of charter schools will serve as annual fiscal reports for CSP subgrants. 4.) the subgrant application has many of the same elements as the model charter school application. 5.) charter school developers may apply to open more than one school with the same authorizer application.

As described on pages 30 - 36 and throughout the grant application, the applicant has numerous mechanisms for technical assistance including both authorizers and charter operators at all stages of planning and implementation. These efforts include the superintendent's council (SSACCS), the Wisconsin Resource Center for Charter Schools, the Authorizer Development Program, the Board Development Program, and the Charter School Development Program. Technical assistance for subgrantees starts before awards with the risk assessment and application processes.

Weaknesses:

No identified weaknesses.

Reader's Score: 20

Selection Criteria - Parent and Community Involvement

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

Strengths:

The applicant provides an adequate plan to solicit and consider the input of parents and community members using several mechanisms. At the local level, Wisconsin legislation requires that the majority of the school board be comprised of people NOT employees of the school or local district, this opens up the other board seats to parent and community members (p. 38). In addition, the CSP subgrant application encourages parent and community input at the local level as applicants must describe how parents were involved in the planning and design of the charter school, how the charter school assessed community and parent support and how parents are involved in implementation efforts (p. 37). At the state level, the SSACCS serve to "increase the overall understanding of charter schools" and for WDPI to learn from perspectives of a cross-section of charter school stakeholders. Two seats on this council are reserved for charter school parents (p. 37). SSACCS Members may participate in the CSP programs by reviewing subgrant applications, procedures and criteria for approval (p.37).

In addition to current efforts, the applicant intends to use CSP funds to provide technical assistance and resources towards a Charter School Board Development Program, which they state will encourage parental and community involvement (p. 38).

Weaknesses:

Even though the applicant describes plans to engage parents on local governing boards through participation in the subgrant process and through the SSACCS, the applicant did not mention other mechanisms for soliciting input that reach a broader audience of parent and community members.

Reader's Score: 9

Selection Criteria - Quality of Project Design

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

1) The subgrant application and peer review process, timelines for these processes, and how the State entity intends to ensure that subgrants will be awarded to eligible applicants demonstrating the capacity to create high-quality charter schools; and

2) A reasonable year-by-year estimate, with supporting evidence, of (i) the number of subgrants the State entity expects to award during the project period and the average size of those subgrants, including an explanation of any assumptions upon which the estimates are based; and (ii) if the State entity has previously received a CSP grant, the percentage of eligible applicants that were awarded subgrants and how this percentage related to the overall quality of the applicant pool.

Strengths:

The applicant's subgrant program is well thought-out and sufficiently detailed to indicate the likelihood that the applicant will achieve program objectives. The applicant articulates a plan for wide dissemination of the public notice inviting applicants, including direct mail to agencies in WDPI database, webpage posting, grant workshops through the state, press releases and through partner organizations (p. 13-14). The applicant describes a reasonable timeline for posting grant competition announcement, receiving and reviewing grant applications, announcing awards, disbursing 1st year funds, and ongoing support and monitoring (table p. 44). Additionally, subgrant award notification in April allows for subgrantee sufficient time to plan for a grant cycle beginning in July (p. 44). The required application components align with the model charter application and should allow for reviewers to determine whether or not the applicant will be able to meet the objective of a high quality charter schools (p. 29-30 & 40 - 41). Finally, the applicant describes a comprehensive peer-review process, including recruiting peer reviewers from school district offices, charter school developers, charter school board members, WDPI staff and other experts, and the required training for all reviewers (p. 43).

The applicant's methods for estimating the number of subgrants for new schools and average size of those subgrants is clearly articulated and based on concrete evidence from prior grant cycles. The average number of new charter schools (n = 20) per year, the average rate of new charter schools previously receiving CSP subgrants (75%), and the average award paid previously (now adjusted for 5-yr grant period, instead of 2-yr) (p. 46). Additionally, the applicant has adjusted award amounts based on number of enrolled students in subgrantee schools, either fewer than 150 students or more than 150 students.

Weaknesses:

As articulated in this section of the application (p.46), actual projected numbers conflict with cited projections other places in the application. The number of estimated subgrant awards provided in the table on page 46 totals 115 (new schools n = 78; expansion and replication n=37), but the total estimation page 13 equals 107 (new schools and replication n = 80; expansion n=27). In the performance targets on page 49 only new schools are estimated (n = 80; p. 49). Further, while the applicant describes the methods for estimating the number of new schools, it does not address how the estimated number of expansion grants was derived. These discrepancies call in to question the accuracy and validity of projection.

The applicant also fails to provide any description in the project design regarding the focus on high school grade levels as articulated on page 13 in the project objectives. If preference is given to charter schools serving secondary grades, then accurate projections regarding the number of subgrant awards targeted for those schools serving secondary students should be included in program design section (p. 46).

The following discrepancy should be noted:

On page 46, the applicant uses a rate of 75% of subgrantee grants awarded in previous cycles to estimate subgrant awards in this new grant cycle. However, the applicant states that 70% of eligible subgrantee applicants received awards from the previous CSP grant period (p. 47). The conflicting information causes a bit of confusion but the rates are not so drastically different as to call into question the overall estimate of subgrants.

Reader's Score: 13

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 very thorough and cohesive management plan and Logic Model. Specific performance measures and targets define the scope of the work described in the application and align with the objectives. The Logic Model and Performance Measures table outline measurable long-term performance targets as well as annual milestones (p. 49-58).

In addition to measurable performance targets, baseline data are provided, as are assumptions, and applicant activities (technical assistance and collaboration) (p. 49-58). Also under each Objective in the Logic Model and Performance Measures the applicant includes regular monitoring of progress on objectives and performance targets.

The applicant addresses monitoring activities in the Logic Model (p. 59) and in other sections of this application with sufficient detail to suggest adequacy and capacity to address any CPS compliance issues. Further evidence of the applicant's willingness and capacity to address CPS compliance issues, is their description of changes, including increased monitoring and technical assistance, in the grant process following West Ed's review under the previous grant cycle (p. 48-49).

The role of grant funds in meeting program goals of increasing the number of high quality charter schools and improving the outcomes of students, especially educationally disadvantaged students is clearly described throughout the application and in the logic model. The applicant intends to provide subgrants (90%), technical assistance (7%) and administrative support (3%) as required by grant provisions (p. 58).

Weaknesses:

The Performance Measures used to evaluate Objective #1 (p. 51), improved student achievement, are limited to only 4th and 8th grade measures. This may be a limitation of the statewide assessment and data systems. However, this does not allow for the evaluation of this objective for charter schools serving students in high school, an identified priority in the awarding of subgrants. This may either require the exclusion of eligible subgrantees serving students in the excluded grades or make it difficult to assess the objectives of this applicant. It is unclear which grade levels are included in performance measures 1c (p. 50) and 1g (p. 52), which may address the weakness stated above.

Reader's Score: 13

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 fully demonstrates that charter schools are subject to regular review and evaluation by authorizers in Wisconsin by referencing applicable state legislation and describing processes for accountability of this responsibility. Wisconsin legislation requires authorizers to monitor academic and financial progress, as well as compliance with charter contract terms, for each charter annually (p. 1), much more frequently than required by this competitive preference priority, and consider renewal of the initial charter after 5 years (p. 2). Authorizers must then submit an annual report about the progress of their charter schools to the state superintendent and legislature (p. 1). Wisconsin Charter Schools Program (within the office of the Superintendent of Public Instruction) monitors submission of the authorizer annual report (p.1), adding another layer for oversight and accountability.

Annual review of charter school progress is strengthened through authorizer authority to impose meaningful consequences. Wisconsin legislation grants the authority to authorizers to not renew or revoke a charter at any time if a charter school "violates its contract, pupils fail to make sufficient progress to meet educational goals, the school does not comply with generally accepted accounting standards... or violates a provision of the charter school law" (p. 2). The applicant provides convincing evidence about the authorizer enforcement of these provisions, stating that 86 charter schools have closed between 2011-12 and 2015-16 due to "low academic performance, financial concerns and low

enrollment" (p. 2).

Weaknesses:

No identified weaknesses.

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 provides a thorough and complete description of charter school oversight in the state of Wisconsin. The references to state legislation provide the necessary evidence that charter schools operate under legally binding contracts. Wisconsin legislation requires legally binding contracts between charter school and authorizer (p.2), including 15 contractual provisions regarding the rights and responsibilities of both the charter school and authorizer (p.2-3). Wisconsin legislation also requires annual programmatic and fiscal audits of charter schools be submitted to the authorizer and the Dept. of Public Instruction.

Additionally, Wisconsin's laws demand that each charter school demonstrates improved pupil performance for all students and that a school's progress be reviewed annually (p. 1 & 4). Wisconsin's accountability system includes charter schools and annual school report cards (Appendix F4) include measures of improvement for all students through academic growth and gap closure measures. Further, Wisconsin legislation grants the authority to authorizers to not renew or revoke a charter if charter school pupils fail to make sufficient progress to meet educational goals (p. 2 & 4). The applicant successfully argues that improvement in student academic achievement is one of the "most important factors" for renewal decision based on the legislative authority to not renew or revoke a charter for this reason (p. 4)

Adding strength to the application is the additional accountability provided by Wisconsin Charter Schools Program (WCSP). To monitor adherence to legislative requirements, WCSP reviews all contracts for compliance with state and federal law (p.3) and monitors the completion and submission of fiscal audit reports (p.3).

Weaknesses:

Although the applicant met the competitive preference priority criteria, the application lacks additional detail regarding the 15 contractual provisions regarding the rights and responsibilities are the charter school and authorizer.

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:

Meeting the requirements of this competitive preference area, the applicant describes the multiple authorizers afforded under Wisconsin statute. Wisconsin legislation permits school boards, institutes of higher education and city and government agencies to authorize charter schools (p. 5). To date, two universities and one city government have granted charters (p.5).

Weaknesses:

No identified weaknesses.

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 makes a partial argument that charter schools receive equitable funding when compared to traditional public schools. The applicant states that charter schools receive current year per-pupil funding from the state in the same manner as traditional public schools (p. 5). In addition state per-pupil funding, charter schools in Wisconsin have access to equitable funding under other federal programs, state special education, transportation and school lunch programs (p. 5). The applicant describes the promptness of funding in a description about how WDPI works with new charter schools to project enrollment and provide new funding without delay (p.5).

Weaknesses:

Though the applicant makes statements assuring the equitable financing of charter schools, the lack of references to state legislation casts doubt on the extent to which the State ensures, or mandates, equitable funding. Further, while the applicant describes the process for providing funding without delay for new and expanding charter schools (p.5), the applicant neglects to describe the process and timelines by which funding flows to currently operating charter schools making it difficult to determine the extent to which funding is prompt.

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 demonstrates that Wisconsin partially supports charter schools in access to facilities. Wisconsin legislation provides access to public facilities and right of first refusal for charter developers and operators in Milwaukee, where 20% of the state's charter schools are located (p.6).

Weaknesses:

The support of charter school acquisition does not, however, extend to all charter schools in the State. Provisions for access to public facilities and right of first refusal by charter developers and operators is limited to Milwaukee (p.6), leaving 80% of charter schools in the State without access to provisions under this Competitive Preference Priority.

Reader's Score: 1

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

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

Strengths:

The applicant demonstrates a commitment from the State to use best practices to improve struggling schools through its statewide Promoting Excellence for All (PEFA) initiative. Through the PEFA, educators and leaders from traditional public schools and charter schools identify proven strategies for closing race-based achievement gaps in their schools. These strategies are then shared through an interactive website (p. 6-7).

Weaknesses:

Although the applicant describes the State's commitment to improve struggling schools using best practices, the efforts described by the applicant are limited to one mechanism without articulated evidence of success. This single effort is web-based and relies on users to search out applicable best practices and resources, rather than using direct efforts to connect struggling schools with best practices. Additionally, this single effort is statewide and includes both traditional public and charter schools. The applicant fails to address how best practices from charter schools, specifically, are identified and then used to help improve struggling schools and LEAS. Further, the PEFA effort described by the applicant relies on teacher and school leader identification of best practices (p. 6), rather than a comprehensive or rigorous method for identifying best practices in schools (especially schools that may have not yet, or chosen not, to participate in this initiative).

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:

The applicant makes the case that the State encourages charter schools to serve at-risk students through preferences in authorizing and grant funding, as well as accommodations in accountability systems. Wisconsin legislation requires charter authorizers to give preference to applicants that intend to serve at-risk students (p. 7). Additionally, CSP subgrant applications require the charter school to describe the activities they will use to reduce achievement gaps and serve at-risk students (p.7). Further, Wisconsin created an alternative accountability system based on growth measures (and accounting for low enrollment and missing data) for schools that serve exclusively at-risk schools, including charter schools (p. 7).

The applicant also describes a State initiative to provide academic and career planning for all students in the state, which conceivably may benefit at-risk students (but is not exclusive to them) (p.7).

Weaknesses:

Although the applicant provides evidence of the State's encouragement of charter schools to serve at-risk students, the applicant does not address how it directly, and to what extent, supports charter schools that serving at-risk students, other than CSP subgrants. This application lacks a thorough description of technical assistance, professional development efforts and other initiatives aimed at specifically at supporting charter schools that serve at -risk students.

Reader's Score: 1

Competitive Preference Priority 8 - Best Practices for Charter School Authorizing

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

Strengths:

The applicant demonstrates substantial efforts to ensure quality authorizing and implementation of best practices. Wisconsin's commitment to quality authorizing is evident in the legislative requirement that charter authorizers "adhere to the NACSA's Principles and Standards" and the requirement that authorizers approve only high quality application (p. 8). WDPI provides technical assistance and resources regarding best practices for authorizers on a website (p. 8). This technical assistance includes opening and closing checklists (Appendix 7) that helps authorizers ensure that charter schools are adequately prepared to open doors or appropriately close down. In addition, the applicant provides contract benchmarks which assist authorizers in drafting legally binding contracts (p. 8). To monitor quality of authorizers, WDPI requires authorizers to submit an annual report about the progress of their charter schools to the state superintendent and legislature (p. 1 & 9). In addition to the current efforts, the applicant is taking steps to intentionally improve support of authorizers with these grant funds (p. 8).

WDPI plans to improve/increase support of authorizers with these grant funds (p. 8).

Weaknesses:

Although the applicant demonstrates substantial efforts to ensure quality authorizing and implementation, efforts to support authorizers in the implementation of best practices are limited to technical assistance documents and compliance monitoring. This application lacks a description of training, professional development, collaboration opportunities or site visits aimed at ensuring best practices of charter authorizers across the state, which would have provided the reviewer with more comprehensive understanding of the specific levels of support afforded to authorizers.

Reader's Score: 4

Status: Submitted

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