

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

Status: Submitted

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## Technical Review Coversheet

**Applicant:** Responsive Education Solutions (S282M200006)

**Reader #1:** \*\*\*\*\*

	Points Possible	Points Scored
<b>Questions</b>		
<b>Selection Criteria</b>		
<b>Quality of the Applicant and Adequacy Resources</b>		
1. Applicant and Resources	40	29
<b>Significance of Contribution in Assisting Students</b>		
1. Disadvantaged Students	20	15
<b>Quality of the Project Design and Evaluation Plan</b>		
1. Project Design/Evaluation	30	24
<b>Quality of Project Personnel and Management Plan</b>		
1. Personnel/Management	10	8
<b>Sub Total</b>	100	76
<b>Priority Questions</b>		
<b>Competitive Preference Priority</b>		
<b>CPP 3: High School Students</b>		
1. High School Students	2	2
<b>CPP4: Serve Native American Students</b>		
1. Native American Students	4	0
<b>CPP5: Reopening Poor-Performing Schools</b>		
1. Reopening Schools	2	2
<b>Sub Total</b>	8	4
<b>Total</b>	108	80

# Technical Review Form

Panel #3 - FY20 CMO - 3: 84.282M

Reader #1: \*\*\*\*\*

Applicant: Responsive Education Solutions (S282M200006)

## Questions

### Selection Criteria - Quality of the Applicant and Adequacy Resources

#### 1. 1. Quality of the Eligible Applicant and Adequacy of Resources

In determining the quality of the eligible applicant, the Secretary considers the following factors:

Reader's Score: 29

#### Sub

1. a. The extent to which the academic achievement results (including annual student performance on statewide assessments, annual student attendance and retention rates, and, where applicable and available, student academic growth, high school graduation rates, college attendance rates, and college persistence rates) for educationally disadvantaged students served by the charter schools operated or managed by the applicant have exceeded the average academic achievement results for such students served by other public schools in the State.

#### Strengths:

Data that support the expansion and replication of ResponsiveEd's Premier High School (PHS) network alternative education model (e10) includes its recognition as the highest performing alternative education district in Texas in all three domains of student achievement, academic growth, and performance. (e40)

ResponsiveEd provided evidence from the student achievement domain in the accountability system, which indicated that PHS campuses in Texas exceeded the state average for alternative education sites. (e42)

While some of the data presented reporting Premier's performance included rates of academic growth for low income, ELL, and students with disabilities in Texas, only students with disabilities data was reported for Arkansas. (e43)

Based on the focus on new Career and Technical (CTE) model enhancements made the reported graduation rates for four-and five-year rates even more significant. Graduation rates at Premier did dramatically exceed the five-year state average, and the data provided graduation rates for low-income and ELL students. (e43-44) In terms of persistence rates, data documented that one-third of Premier students were still enrolled in post-secondary institutions after two years. (e44)

Additional data, including daily attendance and re-enrollment rates, were provided, which are significant factors when examining the unique class schedule used by PHS. (e45-46)

Academic achievement rates were disaggregated by state, and the Arkansas data did indicate a significant increase in proficiency in reading at the one Premier campus as compared to the state. (e41)

**Sub**

**Weaknesses:**

The overall reporting of academic achievement growth was inadequate. Premier network data was reported without any state comparison data. This data was provided on the individual school's Texas Academic Performance Report for the state, district, and campus located in the appendix. (e274- 856) The academic data reported on the Premier model did not provide a comparison to the average state performance. Instead, the ResponsiveEd's comparisons are to alternative schools in Texas and not to the state average. This process of comparison to a state subgroup (i. e., alternative schools) instead of the state average results did not allow for an accurate comparative analysis. (e41-44) The network did not provide an analysis of the number of PHS schools meeting or exceeding the state average.

ResponsiveEd reported academic data from their Texas College Preparatory Academies (TCPA) model. (e19) The design of this grant application is to expand and replicate the Premier High School model only. (e40-42) While these are both high school models, the type of students served are drastically different. By reporting data across various high school models, the reviewer is unable to assess accurately the increase of academic achievement for the specific model (Premier) that is being expanded/replicated.

The reporting of aggregate student achievement based on the state accountability system did not provide specific data on student achievement, academic growth measures, or college and career readiness. These are all critical indicators, and there was no identifiable data submitted for review.

ResponsiveEd has been implementing the Premier model systematically for years. Still, the inability to present academic achievement results for any year compared to state average performance and the lack of longitudinal analysis of growth is a deficiency of the application. (e41)

The Arkansas achievement data narrative did not provide any math scores, and none of the scores provided any subgroup analysis (e41), while in the Appendix (e857-867), there were disaggregated scores across race, sex, economically disadvantaged, ELL, and students with disabilities reported.

**Reader's Score: 5**

- 2. b. The extent to which one or more charter schools operated or managed by the applicant have closed; have had a charter revoked due to noncompliance with statutory or regulatory requirements; or have had their affiliation with the applicant revoked or terminated, including through voluntary disaffiliation.**

**Strengths:**

ResponsiveEd has never had a charter revoked due to noncompliance or voluntary disaffiliation. (e46)

ResponsiveEd has a defined set of procedures designed to address any closures with strategies to be implemented to guide parents and students in their transition to other educational opportunities. (e47)

**Weaknesses:**

ResponsiveEd has closed six charters, which is 7.5% of its portfolio, at their discretion for operational or financial reasons. (e46) The applicant stated the reasons for closures were fiscal viability or lack of facilities resulting in merging with other campuses. (e46)

There was no specific data regarding if any of the closures were on Premier campuses. (e46-47)

**Reader's Score: 7**

- 3. c. The extent to which one or more charter schools operated or managed by the applicant have had any significant issues in the area of financial or operational management or**

**Sub**

**student safety, or have otherwise experienced significant problems with statutory or regulatory compliance that could lead to revocation of the school's charter.**

**Strengths:**

ResponsiveEd reported no issues in financial/operational management or student safety, leading to the revocation of a charter. (e47) Based on the infrastructure, support, and personnel, as documented in the management narrative, staff resumes, and the ResponsiveEd organizational chart (e78), there is strong support and organizational processes provided by the CMO.

**Weaknesses:**

No weaknesses were found

**Reader's Score: 10**

**4. d. The potential for continued support of the project after Federal funding ends, including, as appropriate, the demonstrated commitment of appropriate entities to such support.**

**Strengths:**

ResponsiveEd has built a strong infrastructure of support for its network of schools. This grant application is built upon current partnerships with post-secondary institutions and industry leaders who are critically essential to new programmatic component of Career and Technical Education. These are evidence of the types of infrastructure developed by the CMO. (e37-38)

The organizational model has been structured to provide support to the creation and sustainability of the new campuses, as identified in this application. (e48)

ResponsiveEd has a strong financial system in place. Fiscal resources of ██████████ in net assets, ██████████ in bonds back by the Texas Permanent School Fund, and a ranking of "A" by Financial Integrity Rating System of Texas are all evidence of its financial integrity and the resources that support these twenty-seven new schools after federal funding ends. (e48-49)

Letters of support were provided by wide range of stakeholders. (e30-31)

**Weaknesses:**

ResponsiveEd did not provide a sustainability budget that presents projected enrollments, funding categories, and an ending balance that is earmarked to sustain the twenty-seven new PHS sites.

ResponsiveEd has established a fund development plan to generate more resources to support the replication of their model(s). Unfortunately, their development plan is not comprehensive. It identifies two specific sets of work to increase funding opportunities 1) philanthropic dollars based on current and past funding relationships and 2) active development of "governmental grant" applications. (e49) The development fund lacks specificity regarding how the funding will be used, what major donors have been identified, and there were no letters of support from donors or reports of other "governmental grant" applications the CMO will pursue.

ResponsiveEd has identified specific sustainability strategies that they use as metrics, including an operational metric that by the third year of operations, the school will provide all services with funds from per student allotments and local start-up revenues. (e49) This practice raises a concern regarding the sustainability of the expanded and new PHS sites.

**Reader's Score: 7**

**Selection Criteria - Significance of Contribution in Assisting Students**

## 1. 2. Significance of Contribution in Assisting Educationally Disadvantaged Students

The Secretary considers the significance of contribution in assisting educationally disadvantaged students for the proposed project. In determining the significance of the contribution the proposed project will make in expanding educational opportunities for educationally disadvantaged students and enabling those students to meet challenging State academic standards, the Secretary considers the following factors:

Reader's Score: 15

Sub

1. 1. The extent to which charter schools currently operated or managed by the applicant serve educationally disadvantaged students, particularly students with disabilities and English learners, at rates comparable to surrounding public schools or, in the case of virtual charter schools, at rates comparable to public schools in the State.

### Strengths:

ResponsiveEd reported Premier High School network data documenting the percentage of disadvantaged students served, including 92% at risk, 73% low income, 22% ELL, and 11% of students with disabilities. Premier served more students than the state average in each of these categories providing evidence of the significant disadvantaged student populations. (e51)

ResponsiveEd has six charter school models, and Premier High School's model is designed specifically to serve educationally disadvantaged students. The instructional design has research-based instructional components and includes project-based learning, self-paced independent course design allowing students to accelerate credit completion based on an individualized student plan designed to provide personalized student support services to enhance their learning opportunities.

Instructional strategies are aimed to target ELL students and were well developed as part of the applicants plan (e32-38)

### Weaknesses:

ResponsiveEd did include every Premier High School state academic performance report in the appendix, which compared each campus to the district and the state. This information was not made available for the network as an aggregate comparison. (e274-856) The data documentation did not report the percentage of PHS schools that outperformed their district or the state in terms of academic achievement. In terms of specific academic data for subpopulations of economically disadvantaged, ELL and students with disabilities, ResponsiveEd did not provide a data set that reported the performance on these critical academic outcomes from the STAAR performance rates which are reported, in the appendix, on the Texas Academic Performance Report for each Premier school. (e274-856)

ResponsiveEd did not provide a comprehensive data set focusing on the subpopulations of ELL and students with disabilities in terms of academic achievement. There was no data presented that compared ResponsiveEd scores to the state for either ELL or students with disabilities. (e51) There was no data presented that provided a percentage of Premier schools that met or exceeded the state performance indicator for ELL or students with disabilities.

Reader's Score: 8

**Sub**

**2. 2. The quality of the plan to ensure that the charter schools the applicant proposes to replicate or expand will recruit, enroll, and effectively serve educationally disadvantaged students, particularly students with disabilities and English learners.**

**Strengths:**

The design of the unique schedule providing three distinct academic learning opportunities that expands the academic access for all students in PHS programs. This is significantly important for students who might need flexibility due to their educational or economic status. This will assist in recruiting, enrolling, serving and retaining educationally disadvantaged students. (e53)

There is a clear prioritization of CMO resources designed to support ELL including a certified English Second Language (ESL) teacher and centralized support from the CMO that incorporates systematic training including monthly online sessions and quarterly review of ELL programming per campus. (e55) There is a stated commitment to have all staff ESL-certified in five years which is a rigorous goal.

ResponsiveEd has a set of clear procedures, based on best practices, for service delivery for ELL students. Their plan is comprehensive with the availability of one-to-one tutoring, online Language Support, and level literacy interventions. (e53-54) There is a well-defined set of interventions including Transitional Bilingual Education, English as a Second Language, Sheltered English, and Structure Immersion. (e54)

In terms of students with disabilities services, the CMO supports a model of Multi-Tiered Systems of Support supported by annual training on evidence-based practices. (e55-56)

Recruitment strategies of targeted outreach included traditional strategies including translation into multiple languages of recruiting materials, a marketing plan using multi-media including radio, in-person events, targeted emails, website, outreach community events, access through faith-based, community centers, libraries medical offices, and businesses. (e58)

The CMO has three staff positions dedicated to the recruitment, designing, and coordinating marketing efforts. (e59)

**Weaknesses:**

The recruitment plan did not differentiate between new Premier sites and expansion sites. There were no identified strategies to expand ELL, students with disabilities or educationally disadvantaged student populations at existing schools with specific goals for increased student subpopulation enrollments. (e58)

It was unclear who would serve as the school-based staff assigned recruitment duties for new campuses especially based on the timeline of recruitment being initiated in December before the opening of the new Premier site. (e58)

The use of public transportation and "when appropriate to provide financial assistance" would be a barrier to many families of disadvantaged students. (e60)

**Reader's Score: 7**

**Selection Criteria - Quality of the Project Design and Evaluation Plan**

**1. 3. Quality of the Project Design and Evaluation Plan for the Proposed Project**

**The Secretary considers the quality of the design of the proposed project. In determining the quality of the design of the proposed project, the Secretary considers the following factors:**

**Reader's Score: 24**

**Sub**

**1. 1. The extent to which there is a conceptual framework underlying the proposed research or demonstration activities and the quality of that framework.**

**Strengths:**

ResponsiveEd presented strong research-based indicators for the inclusion of the social-emotional learning component, Capturing Kids' Hearts (CKH) (e60-61), in all expansion sites. It is based on the research of Albert Bandura and has evidence of proven positive effects on both student academic achievement and social-emotional outcomes. (e60) The evidence focused on the results of a 9th-grade quasi-experimental study of CKH producing significantly higher passing rates in English, math, and social studies for the intervention group. (e61)

Each of the new twenty-seven Premier schools will also have a focus on Career Technical Education (CTE) as an intervention. (e61-62) ResponsiveEd's definition of alternative education has always focused on breaking down barriers. Instead of a traditional, alternative education "isolation" design, the implementation of the CTE model with dual credit and industry credentialing is expanding the options for each of the graduates. The CTE model is designed to provide not just entry-level work but also has a postsecondary opportunity to get a degree in one of the two areas of emphasis. For example, the CMO has chosen to develop healthcare as one of the first new curricula, which will allow any of the PHS expansion sites to have job placements in their community after graduation.

The conceptual framework was designed with specific demonstration activities utilized in the implementation of the framework. The framework will produce quantitative and qualitative data during the grant's timeline. (e62)

**Weaknesses:**

No weakness found.

**Reader's Score: 5**

**2. 2. The extent to which the methods of evaluation include the use of objective performance measures that are clearly related to the intended outcomes of the proposed project, as described in the applicant's logic model, and that will produce quantitative and qualitative data by the end of the grant period.**

**Strengths:**

ResponsiveEd has identified their evaluation partners, Metis Associates, and have already established a working relationship with their services being provided within the initial CSP grant ResponsiveEd received. (e62-63) The external evaluator has developed a plan that collects both qualitative and quantitative data and provides continuous feedback to staff on the implementation strategies and their effectiveness. (e62-63)

ResponsiveEd has created a comprehensive logic model (e64) that details the specific qualitative and quantitative data under outputs, outcomes, and results. (e64) The interim outcomes and results are measurable and contain a specific performance indicator.

The data collection process is detailed and included multi measures including data surveys, site visits, observations, walkthroughs, and reviews of student learning plans as part of the analysis of the learning opportunities provided to educationally disadvantaged students. (e62)

The logic model details the four goals of the initiative, with half of them tied to increasing academic achievement and post-secondary success with educationally disadvantaged students. (e64) The other half will measure support for the CMO capacity building and scalability in areas of professional development, outreach and marketing



**Sub**

strategies, collaboration with partners, and growing network schools. (e65)

**Weaknesses:**

No weakness was found.

**Reader's Score: 10**

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

**Strengths:**

The goals contain a narrative description that ties them directly to CSP defined grant requirements. (e71-74)

Each goal has a set of performance measures (PM) that are measurable and clearly defined. (e71-74) The goals are reasonable and can be fully implemented and assessed by the end of the grant timeline. For example, the grant serves 3,848 students and the goal is to increase postsecondary enrollment at 3% annually. (e53-56)

Goal two is comprehensive with the inclusion of six performance measures that document the variety of strategies that are utilized to examine the college and career-ready component of Premier's expansion plan. (e73)

**Weaknesses:**

For goal one, the performance is measured by an increase in the number of students enrolled, including educationally disadvantaged students. There is no indicator of a targeted growth goal for the designated subpopulation included in the yearly targets. (e72)

In performance measure 2.2, the percentage of students who earn one or more industry certification is measured by 5% growth in years 2 and 3. The percentage of students who earn one or more industry certifications changes to only a 3% growth indicator for years 4 and 5, which is when the network will have the most schools opened. The student population is at its largest size based on their tiered schedule of school openings, which is documented in PM1.3. (e72) The change in the evaluative criteria was not adequately explained.

Some of the goals were general and did not have specific and measurable components. For example, project goal four on professional development focuses on data collection only with a focus on CKH training. The goal merely counts participation without any examination of the implementation of the initiative, the total hours of instruction provided annually, or outcomes based on the intervention in the new model. (e74)

The examination of graduation rates indicated that PHS students demonstrated gains that were comparable to statewide goals. This data analysis did not examine the cohort graduation rates for PHS and the state. (e44)

The weakest performance measures were goals that defined student outcomes. For example, the goal to improve opportunities for educationally disadvantaged students to meet challenging state standards was measured by increasing by 2% the students who pass math and by 1% the students who pass English courses annually. These goals are not rigorous.

**Reader's Score: 3**

**4. 4. The extent to which the design for implementing and evaluating the proposed project will result in information to guide possible replication of project activities or strategies, including information about the effectiveness of the approach or strategies employed by**

Sub

the project.

**Strengths:**

The evaluation design does contain both summative and formative components. The design utilizes multiple measures over multiple subjects. It will provide real-time feedback to the practitioners. Summative data will provide details to support planning and implementation for any model or implementation design changes. (e64-65)

The student data analysis component of the evaluation plan is well designed and comprehensive. The inclusion of attendance data, credit accumulation, CTE exam data, and job placement by alumni are components that will provide specific feedback to impact future replications. (e69-71)

Biannual site visits, interviews, surveys, and focus groups focusing on the implementation of the CTE pathways are strong components of the evaluation plan with an emphasis on examining instructional procedures, individual learning plans, and student work. (e66-67) This evaluation component is essential to real-time feedback to the practitioners allowing for any necessary curriculum or instructional modifications.

ResponsiveEd will disseminate findings at CSP meetings and regional and state conferences. (e76) There is a plan for reporting by Metis to the Project Director and Grants Manager. (e74) Qualitative data will be shared with campus directors (e75) as lessons learned, and these various data findings will be shared with the Community Advisory Councils.

The design of the evaluation has a significant number of goals focusing on the growth and scalability of the organization (ResponsiveEd). An example is a focus on the evaluation of recruitment strategies. (e66)

**Weaknesses:**

The new Premier model is based on partnerships supporting the focus on CTE programmatic interventions (e61-62), but not all seven identified pathways will be offered on each school campus. This design decision limits student access to career preparation in their specific area of interest. The implementation design did not address the criteria that would be utilized to decide on which CTE components would be provided (e36) or how partners, both industry leaders, and post-secondary institutions, would be recruited.

The evaluation plan does not contain any identified evaluative measures or strategies focusing on the implementation or outcomes of the social-emotional learning component, Capturing Kids' Hearts (CKH), to guide replication in the future. (e61-69) The evaluation plan only addresses CKH with the documentation of PD sessions, which is not a rigorous data set since it does not even examine teacher feedback on the program before or after the PD or provide any student outcomes that would be examined based on the CKH programmatic implementation.

Reader's Score: 6

**Selection Criteria - Quality of Project Personnel and Management Plan**

**1. 4. Quality of Project Personnel and Management Plan**

**The Secretary considers the quality of the personnel who will carry out the proposed project and the quality of the management plan for the proposed project. In determining the quality of project personnel, the Secretary considers the extent to which the applicant encourages applications for employment from persons who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability.**

**In addition, the Secretary considers:**

**Reader's Score:** 8

**Sub**

**1. 1. The qualifications, including relevant training and experience, of key project personnel.**

**Strengths:**

ResponsiveEd has a strong staff of trained professionals with a wide range of services provided to their school sites, as indicated in the flow chart that lists twenty-eight staff members and their roles. (e78)

The appendix contains eleven resumes of key staff positions (e109-138), which provide their duties, background, educational credentials, and training specifically related to their assignments in support of this grant.

The CMO has prioritized the development of a funding plan and has assigned the new Chief of Staff to provide leadership to this effort. (e49)

The narrative contained descriptions of two management and leadership staff positions - CEO and Project Director for this and the current CSP grants. (e76-77) The CEO has twenty years of experience with ResponsiveEd serving in his current leadership role while the network developed six distinct charter instructional models and grew the network to be the largest in Texas while also establishing charters in Arkansas. It also provided key leadership positions and a full description of the personnel assigned and their expertise. (e82-86)

The CMO has designated a grants manager for this grant who reports to the Director of Research and Evaluation. There are job descriptions and a list of duties for the position. (e75, e85)

**Weaknesses:**

The resumes for two important positions, the Director of Career and Technical Education and the Special Education Director, were not included. (e85-97)

There was a lack of information regarding recruitment and hiring practices of underrepresented groups with the CMO and the staff on Premier campuses.

**Reader's Score:** 4

**2. 2. The adequacy of procedures for ensuring feedback and continuous improvement in the operation of the proposed project.**

**Strengths:**

ResponsiveEd has established an internal standardized monitoring instrument and the process for its use. (e86) It provides a comprehensive set of eight standards with performance measures defined. The utilization process includes an annual self-evaluation per campus and periodic formal reviews. (e87) This provides a structured feedback process with annually identified improvement areas.

ResponsiveEd has established three distinct feedback strategies to assure examination of school and CMO practices annually. This data provides an opportunity to address any areas in need of improvement based on the feedback generated by various stakeholder groups. (e87-88)

The Community Advisory Council is another feedback strategy utilized by the ResponsiveEd network of schools. (e88) ResponsiveEd also has a quality assurance protocol based on surveys of parents to provide feedback on the CMO and school. (e88)

**Sub**

**Weaknesses:**

There was no strategy or tool designed to gather feedback from industry and higher education partners as the implementation of the new CTE design is implemented. (e61-62)

There is no strategy or tool designed to gather feedback from the students. As many of the students have left traditional schools, their feedback regarding why they chose PHS and what encourages them to stay enrolled and engaged would provide insights that would strengthen the recruitment plan. (e64)

**Reader's Score: 4**

**Priority Questions**

**Competitive Preference Priority - CPP 3: High School Students**

**1. Competitive Preference Priority 3: High School Students**

To receive points under this priority, an applicant must propose to --

- a. Replicate or expand high-quality charter schools to serve high school students, including educationally disadvantaged students;
- b. Prepare students, including educationally disadvantaged students, in those schools for enrollment in postsecondary education institutions through activities such as, but not limited to, accelerated learning programs (including Advanced Placement and International Baccalaureate courses and programs, dual or concurrent enrollment programs, and early college high schools), college counseling, career and technical education programs, career counseling, internships, work-based learning programs (such as apprenticeships), assisting students in the college admissions and financial aid application processes, and preparing students to take standardized college admissions tests;
- c. Provide support for students, including educationally disadvantaged students, who graduate from those schools and enroll in postsecondary education institutions in persisting in, and attaining a degree or certificate from, such institutions, through activities such as, but not limited to, mentorships, ongoing assistance with the financial aid application process, and establishing or strengthening peer support systems for such students attending the same institution; and
- d. Propose one or more project-specific performance measures, including aligned leading indicators or other interim milestones, that will provide valid and reliable information about the applicant's progress in preparing students, including educationally disadvantaged students, for enrollment in postsecondary education institutions and in supporting those students in persisting in and attaining a degree or certificate from such institutions. An applicant addressing this priority and receiving a CMO grant must provide data that are responsive to the measure(s), including performance targets, in its annual performance reports to the Department.

**Note:** For purposes of this priority, postsecondary education institutions include institutions of higher education, as defined in section 8101(29) of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESEA), and one-year training programs that meet the requirements of section 101(b)(1) of the Higher Education Act of 1965, as amended (HEA).

**Strengths:**

- a) The replication plan envisioned by ResponsiveEd would significantly increase high school enrollment adding 25,000 students in twenty-seven expanded or new charter schools based on the Premier High School (PHS) model. Their commitment to serving disadvantaged high school students is evidenced by the fact that 77% of these new high schools would be in a Qualified Opportunity Zone. (e16, e21-22)

b) The applicant identified a plan designed to address support for increasing postsecondary enrollment and retention based on their Project PATH - Preparing our Alumni Today with Hope initiative that has traditional components including the use of Naviance, academic and alumni counselors, a career center, and assistance with enrollment and scholarships. (e23-24)

c) The 3D Learning System is a model based on diagnostics, delivery, and data. (e32-33) The model has effectively been designed to provide PHS' population of disadvantaged students with an educational system that supports a focused industry-aligned Career and Technical pathway(s) with both dual credit and industry certifications provided as part of the high school experience. (e23) The combination of quality academics provided in a "student-centric" self-paced delivery model provides a personalized approach to high school education that includes access to seven specific career pathways defining the focus of each students' educational program. (e32, e35) ResponsiveEd documented a comprehensive set of existing higher education and industry partnerships that will serve as a conduit to postsecondary entry for their students. (e25-26)

d) The applicant will gather baseline data during year one of implementation, and there were specific project growth measures identified in the evaluation plan. (e72-73)

**Weaknesses:**

- a) No weakness found.
- b) No weakness found.
- c) No weakness found.
- d) No weakness found.

**Reader's Score: 2**

**Competitive Preference Priority - CPP4: Serve Native American Students**

**1. Competitive Preference Priority 4: Opening a New Charter School or Replicating or Expanding a High-quality Charter School to Serve Native American Students**

To receive points under this priority, an applicant must --

**a. Propose to open a new charter school, or replicate or expand a high-quality charter school, that—**

- 1. Utilizes targeted outreach and recruitment in order to serve a high proportion of Native American students, consistent with nondiscrimination requirements contained in the U.S. Constitution and Federal civil rights laws;**
- 2. Has a mission and focus that will address the unique educational needs of Native American students, such as through the use of instructional programs and teaching methods that reflect and preserve Native American language, culture, and history; and**
- 3. Has or will have a governing board with a substantial percentage of members who are members of Indian Tribes or Native American organizations located within the area to be served by the new, replicated, or expanded charter school;**

**b. Submit a letter of support from at least one Indian Tribe or Native American organization located within the area to be served by the new, replicated, or expanded charter school; and**

**c. Meaningfully collaborate with the Indian Tribe(s) or Native American organization(s) from which the applicant has received a letter of support in a timely, active, and ongoing manner with respect to the development and implementation of the educational program at the**

charter school.

**Strengths:**

This preference priority was not addressed.

**Weaknesses:**

This preference priority was not addressed.

**Reader's Score: 0**

**Competitive Preference Priority - CPP5: Reopening Poor-Performing Schools**

**1. Competitive Preference Priority 5: Reopening Academically Poor-Performing Schools as Charter Schools.**

To receive points under this priority, an applicant must --

a. Demonstrate past success working with one or more academically poor-performing public schools or schools that previously were designated as persistently lowest-achieving schools or priority schools under the former School Improvement Grant program or in States that exercised ESEA flexibility, respectively, under the Elementary and Secondary Education Act of 1965, as amended by the No Child Left Behind Act of 2001; and

b. Propose to use grant funds under this program to restart one or more academically poor-performing public schools as charter schools during the project period by—

1. Replicating one or more high-quality charter schools based on a successful charter school model for which the applicant has provided evidence of success; and

2. Targeting a demographically similar student population in the replicated charter schools as was served by the academically poor-performing public schools

**Strengths:**

a) For the last eight years, based on requests from the Texas Education Agency and school districts, ResponsiveEd has taken over eight schools and successfully "turned around" the campuses resulting in the fact that the schools were no longer identified as poor performing. (e26-28) Their portfolio of reopening campuses has been with a wide variety of partners representing charter and traditional educational partners, including state departments of education, school districts, and charter schools.

b.1) ResponsiveEd has identified Snyder Independent School District as a possible new reopening site at their high school who would then become a participant in the grant process. (e28) Based on their track record the likelihood of more than one reopening will occur over the five-year grant period

b.2) The fact that the reopened schools' process has documented the inclusion of up to 90% of former students is an important indicator of ResponsiveEd's commitment to serving disadvantaged student populations. (e28)

**Weaknesses:**

a) No weakness found.

b.1) No weakness found.

b.2) No weakness found.

**Reader's Score:** 2

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**Status:** Submitted

**Last Updated:** 02/12/2020 04:41 PM

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## Technical Review Coversheet

**Applicant:** Responsive Education Solutions (S282M200006)

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

	Points Possible	Points Scored
<b>Questions</b>		
<b>Selection Criteria</b>		
<b>Quality of the Applicant and Adequacy Resources</b>		
1. Applicant and Resources	40	30
<b>Significance of Contribution in Assisting Students</b>		
1. Disadvantaged Students	20	15
<b>Quality of the Project Design and Evaluation Plan</b>		
1. Project Design/Evaluation	30	25
<b>Quality of Project Personnel and Management Plan</b>		
1. Personnel/Management	10	7
<b>Sub Total</b>	100	77
<b>Priority Questions</b>		
<b>Competitive Preference Priority</b>		
<b>CPP 3: High School Students</b>		
1. High School Students	2	2
<b>CPP4: Serve Native American Students</b>		
1. Native American Students	4	0
<b>CPP5: Reopening Poor-Performing Schools</b>		
1. Reopening Schools	2	2
<b>Sub Total</b>	8	4
<b>Total</b>	108	81



# Technical Review Form

Panel #3 - FY20 CMO - 3: 84.282M

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

Applicant: Responsive Education Solutions (S282M200006)

## Questions

### Selection Criteria - Quality of the Applicant and Adequacy Resources

#### 1. 1. Quality of the Eligible Applicant and Adequacy of Resources

In determining the quality of the eligible applicant, the Secretary considers the following factors:

Reader's Score: 30

#### Sub

1. a. The extent to which the academic achievement results (including annual student performance on statewide assessments, annual student attendance and retention rates, and, where applicable and available, student academic growth, high school graduation rates, college attendance rates, and college persistence rates) for educationally disadvantaged students served by the charter schools operated or managed by the applicant have exceeded the average academic achievement results for such students served by other public schools in the State.

#### Strengths:

The applicant provides partially sufficient evidence of academic achievement results in Texas. For instance, annual student performance on statewide assessments in reading and math over the past 3 years indicate an increase of 8 points in reading and 14 points in math compared to statewide average increases of 3 points each; the increases for low-income students were 9 points in reading and 15 points in math. In Arkansas, reading increased by 9 points compared to an 11 point decline state-wide. A total of 97% of PHS campuses received A or B grades in the state's accountability system versus 63% of the overall state alternative public high schools and 58% of charter alternative high schools who received A or B grades. Regarding high school graduation rates over a 5 year period, in Texas, and overall 6.2 % increase was presented (6.7 for low income and 6.5 for English Language Learners (ELLs). Considering college attendance rates and college persistence rates, in Texas, 2016 data indicated 64% of TCPA students and 33% of PHS graduates in Texas were enrolled 2 years post high school graduation. In terms of attendance, for 2017-2018, daily attendance was 96.5% compared to the state average of 95.4%. (e40-42; 274-856)

#### Weaknesses:

Although total CMO rates of increase were provided compared to the state; no state gains were reported for either educationally disadvantaged in Texas. Increases in Arkansas were only reported for reading; math rates were not provided. The applicant stated this was due to a small sample size and thus, was not reported. In tandem statewide results for Arkansas regarding ranking within the state were not reported nor was graduation rates among subgroups reported. The applicant did not provide a true state-wide comparison; rather, the applicant compared CMO scores to alternate schools in the state of Texas. No Arkansas math scores were provided as part of the applicant's plan.(e40-42; 274-856)

Sub

Reader's Score: 6

2. **b. The extent to which one or more charter schools operated or managed by the applicant have closed; have had a charter revoked due to noncompliance with statutory or regulatory requirements; or have had their affiliation with the applicant revoked or terminated, including through voluntary disaffiliation.**

**Strengths:**

The applicant provides that no schools have been closed due to any issues that were statutory in nature or for any violations. The applicant provides that they have not had any revocations or terminations. The applicant is a well-established CMO with 74 campuses serving 18,000 students, having grown from 15 drop out credit recovery sites in 1998. The applicant has a well-designed existing structure within the CMO that is comprised of 28 individuals within an organizational chart which clearly indicates adequate oversight and supervision through a structure of management silos. For example, the organization's Executive VP provides oversight to the VP of Academics, the Executive Director of Special Education, and the Executive Director of Research and Evaluation. The comprehensive management structure within the network is appropriate to supervise six distinct kinds of charter schools and provide adequate support, supervision, and management to address any regulatory requirements and statutes. (e12; e46; e78)

**Weaknesses:**

The applicant provides that over the course of 20 years, 6 of 80 programs have been closed. Closures were due to operational and/or financial reasons. In one instance, closure was due to a school affiliated with a satellite community college campus, and that site closed. (e12; e46; e78)

Reader's Score: 7

3. **c. The extent to which one or more charter schools operated or managed by the applicant have had any significant issues in the area of financial or operational management or student safety, or have otherwise experienced significant problems with statutory or regulatory compliance that could lead to revocation of the school's charter.**

**Strengths:**

The applicant adequately provides that the CMO has never experienced a health violation resulting in state intervention. The applicant also provides that the network has not been cited for any safety violations at its 74 sites. Given the large number of schools within the network, the operational structure provides necessary oversight and ensures compliance, including financial oversight. The supplementary budget narrative addresses how many campuses have night schools, additional hours of operation that provide access to nontraditional students. The applicant presents a budget that reflects large allocations for personnel, necessary expenditures that address a large network of schools and some campuses running additional evening hours. The budget reflects fiscal responsibility and sound financial practices. A comprehensive consolidated financial report for the past fiscal year is also provided as evidence of financial well-being and fiscal responsibility. (e47; e78; Appendix G)

**Weaknesses:**

No weaknesses found. (e47; e78)

Reader's Score: 10

4. **d. The potential for continued support of the project after Federal funding ends, including, as appropriate, the demonstrated commitment of appropriate entities to such support.**

**Strengths:**

The applicant provides a somewhat adequate plan for continued support of the project after federal funding ends. The applicant's proposed plan includes best practice elements in regard to operational practices, sound accounting

**Sub**

practices, and sufficient fiscal management oversight and quality management controls. This is accomplished through a strong internal structure for support. As an example, a policy exists that mandates schools will be self-sufficient by their third year of operation. In addition, the CMO has hired an individual with (Chief of Staff) a strong history of educational background and political ties in the state of Texas who will supervise fund raising efforts as part of the proposed plan. The applicant discusses having a relationship with the Walton Family Foundation and the Bill and Melinda Gates Foundation. Numerous letters of support are provided including letters from community colleges, community organizations such Goodwill, letters from 5 senators and 4 members of Congress, indicating community-based sustainability and legislative support. (e37-38; 48-49)

**Weaknesses:**

While community support is evidenced, no concrete plan for obtaining additional funding is presented beyond having a stated relationship with two foundations. While the relationship is acknowledged, no letter of support from either foundation is provided. Additionally, no specifics regarding what may be included in a strategic and targeted fundraising campaign is offered. Finally, a sustainable budget plan is not included as part of the applicant's proposed plan. (e37-38; 48-49)

**Reader's Score: 7**

**Selection Criteria - Significance of Contribution in Assisting Students**

**1. 2. Significance of Contribution in Assisting Educationally Disadvantaged Students**

**The Secretary considers the significance of contribution in assisting educationally disadvantaged students for the proposed project. In determining the significance of the contribution the proposed project will make in expanding educational opportunities for educationally disadvantaged students and enabling those students to meet challenging State academic standards, the Secretary considers the following factors:**

**Reader's Score: 15**

**Sub**

**1. 1. The extent to which charter schools currently operated or managed by the applicant serve educationally disadvantaged students, particularly students with disabilities and English learners, at rates comparable to surrounding public schools or, in the case of virtual charter schools, at rates comparable to public schools in the State.**

**Strengths:**

The applicant has historically served educationally disadvantaged students, especially secondary students unsuccessful in traditional school configurations. Three past years of programming have realized gains in reading and math across several subgroups. This includes decreasing gaps between White and Black students. The following statistics attest to assisting educationally disadvantaged students: most significantly, 92% of students served by Texas PHS are labeled as at-risk versus 50% statewide; 75% are identified as low income compared to 68% of students located in districts where schools operate; 22% are English Language Learners (ELLs) which compares closely with local districts at 25%; and 11% of students enrolled in Texas PHS are identified as having disabilities, which is higher than the 9% reported in local districts. Five distinct instructional strategies are provided such as project-based learning, working within cohorts, using technology within individualized learning plans, concentrated content progression, and independent, accelerated instruction, all with the intent of meeting learners' specific needs. In addition, 5 strategies intentionally aimed at ELLs are also provided as part of the applicant's plan. (e51-57; Appendix F)

**Sub**

**Weaknesses:**

No comparison data on CMO scores for students identified as ELLs or who receive special education services and state scores were provided; aggregated data for the CMO were not adequately provided for comparison. Scores for disadvantaged students are only reported for the last three years despite the establishment of schools being chartered beyond this three year range. (e51-57; Appendix F)

**Reader's Score: 8**

- 2. 2. The quality of the plan to ensure that the charter schools the applicant proposes to replicate or expand will recruit, enroll, and effectively serve educationally disadvantaged students, particularly students with disabilities and English learners.**

**Strengths:**

Projected enrollment increases were clearly specified in the applicant's partial plan to replicate and/or expand through recruitment, enrollment, and to effectively serve educationally disadvantaged students, in particular students with disabilities and English Language Learners. The proposed plan also included a detailed, specific, and comprehensive marketing plan to recruit. The recruitment plan includes print media, broadcast/radio media, electronic media, and face-to-face events. A strategic method also includes specifically targeting faith-based entities, community centers, libraries, as well as businesses such as medical facilities. Also, partnering with local schools is a strength as schools can recommend disengaged students whose needs may be met by the CMO's programming. The proposed plan also includes four distinct methods of enrollment and a lottery process in the event that demand exceeds capacity. In addition, enrollment is year-long, also a strategy for increasing accessibility. (e58)

**Weaknesses:**

The proposed recruitment plan lacks specifics regarding how recruitment may be differentiated between existing, established schools and newly established schools. No goal to increase subpopulation enrollment was included. While the Executive Director will oversee recruitment, it is unclear who will be responsible for recruitment at the campus level. Although financial assistance will be provided for public transportation, how this might be offered to students in rural areas whose locales cannot access public transportation, was not adequately addressed by the applicant. (e58)

**Reader's Score: 7**

**Selection Criteria - Quality of the Project Design and Evaluation Plan**

- 1. 3. Quality of the Project Design and Evaluation Plan for the Proposed Project**

**The Secretary considers the quality of the design of the proposed project. In determining the quality of the design of the proposed project, the Secretary considers the following factors:**

**Reader's Score: 25**

**Sub**

- 1. 1. The extent to which there is a conceptual framework underlying the proposed research or demonstration activities and the quality of that framework.**

**Strengths:**

The project design is robust and the framework is simple yet effective. This includes personalized learning opportunities and mastery-based instruction. Two additional components are proposed; Capturing Kids Hearts

**Sub**

(CKH) and a Career and Technical Education (CTE) program. The CKH program is based on the self-efficacy work of Bandura, an eminent researcher in this area, and targets faculty/staff's capacity to demonstrate caring and positive behavior. Studies of CKH are included which indicate significant gains in pro-social behaviors as precursors to academic achievement. These programs will be implemented in the proposed 14 new PHS sites and the 12 expansion sites. (e22; e60-62)

**Weaknesses:**

No weaknesses found. (e22; e60-62)

**Reader's Score: 5**

- 2. 2. The extent to which the methods of evaluation include the use of objective performance measures that are clearly related to the intended outcomes of the proposed project, as described in the applicant's logic model, and that will produce quantitative and qualitative data by the end of the grant period.**

**Strengths:**

Thorough evaluation methods are aligned to performance measures in a clear manner. Evaluation will be conducted by a trusted, outside source. Both qualitative and quantitative measures will be used to triangulate results, and will in turn, inform decisions about programming. The accompanying logic model (e64) is comprehensive as it includes inputs, outputs, outcomes, activities, performance measures, and projected impact. Both formative and summative measures are included in the proposed evaluation plan. Evaluation methods include myriad data sources such as survey data, site visits, including observations and walk-throughs, review of individualized learning plans, interviews and focus groups. Surveys will be available in both English and Spanish. Student data are also robust and includes Texas state assessments (STAAR, TELPAS, EoCs) in both reading and math. Four performance levels and four proficiency levels will be utilized to report findings; in Arkansas, ACT Aspire and Dynamic Learning maps are proposed. Analysis is planned using respected methods such as Chi Square and McNemar tests, which are both valid and reliable methods. (e63-71)

**Weaknesses:**

No weaknesses found. (e63-71)

**Reader's Score: 10**

- 3. 3. The extent to which the goals, objectives, and outcomes to be achieved by the proposed project are clearly specified and measurable.**

**Strengths:**

Goals are generally measurable and attainable and aligned to the grant's purposes. There are four goals, and the majority include specific, measurable sub goals. Goals and sub goals are reasonable and ambitious. As an example, the goal of increased access has an end goal of a total of 3,848 students, clearly specific and measurable. In another example, specific increases in postsecondary enrollment is projected at 3% percentage points per year of the grant. This goal is a clearly stated, specific, and measurable goal, aligned to the project's over all goals. (e44; e65; e71-72)

**Weaknesses:**

Goal #4 addresses the capacity of teachers and staff and solely measured by attendance at days of professional development (PD); there are no ways to determine what gains in knowledge or skill are realized by teachers who attend PD sessions. Reducing the number of career technical credentials was not adequately explained within the proposed plan. (e44; e65; e71-72)

Sub

Reader's Score: 3

4. 4. The extent to which the design for implementing and evaluating the proposed project will result in information to guide possible replication of project activities or strategies, including information about the effectiveness of the approach or strategies employed by the project.

**Strengths:**

The applicant presents a partial plan that will provide for some on-going feedback, moderate continuous improvement, and effectiveness of the plan. For instance, articulated plans for monthly communication and bi-annual reports address feedback. The establishment of Community Advisory Councils will function to review feedback and provide feedback from stakeholders. Sharing results includes presentations at local conferences, attending and presenting at charter conferences, and submitting proposals at national conferences, which are all part of the applicant's proposed plan. Evaluation is a stated part of the applicant's plan and will be addressed by subcontracting to a respected outside entity that specializes in evaluation. A dedicated individual within this outside entity will oversee evaluation including data collection activities and analysis and will provide real-time feedback. (e70-75)

**Weaknesses:**

While effectiveness is addressed at many points and junctures within the applicant's proposed plan, replication is not specifically addressed. It is unclear how this approach to feedback will guide replication. No information regarding how members of Community Advisory Councils will be recruited or selected is provided. The process lacks detail regarding how qualitative data will inform replication. (e70-75)

Reader's Score: 7

**Selection Criteria - Quality of Project Personnel and Management Plan**

**1. 4. Quality of Project Personnel and Management Plan**

The Secretary considers the quality of the personnel who will carry out the proposed project and the quality of the management plan for the proposed project. In determining the quality of project personnel, the Secretary considers the extent to which the applicant encourages applications for employment from persons who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability.

In addition, the Secretary considers:

Reader's Score: 7

Sub

1. 1. The qualifications, including relevant training and experience, of key project personnel.

**Strengths:**

Key project personnel possess appropriate experience, pertinent credentials, and adequate expertise that are both relevant and germane to the success of the applicant's proposed plan. For example, the Chief Executive Officer of the CMO is the individual whose vision grew the CMO over the course of 20 years and led and guided the organization to be recognized as the largest system of charter schools in Texas. The organization's structure is adequate to achieve continued expansion. Leadership facets include individuals responsible for finance, special education, technical programming, accounting, learning, research and evaluation, human resources, and communications. Similarly, the Chief of Staff has adequate background, proficiency, and skill-sets as a leader and

**Sub**

currently provides oversight to the CMO’s initial expansion grant. Key project personnel are described according to the capability they bring to the project. A staffing structure is proposed that speaks to capability. A grant manager will be brought on board to provide additional oversight and will report to the Director of Research and Evaluation. A scope of duties is provided for this grant manager position. (e75; e85-97)

**Weaknesses:**

The applicant did not include resumes/curriculum vitas for two key personnel in the proposed plan. For instance, no resumes/curriculum vitas for both the Director of Special Education and the Director of CTE was provided. There was no mention of employing individuals from underrepresented groups in the proposed plan. (e75; e85-97)

**Reader's Score: 4**

**2. The adequacy of procedures for ensuring feedback and continuous improvement in the operation of the proposed project.**

**Strengths:**

The applicant’s proposed plan provides adequate procedures that will ensure feedback and address continuous improvement. The applicant has developed a set of 8 standards that comprehensively attend to feedback and continuous improvement. For instance, standards range from mission and vision to learning to fiscally-responsible management practices. Quality Standards Reviews (QSR) that inform decision-making. In addition, that applicant provides that the CMO also has in place a robust staff evaluation and performance self-assessment system. The Community Advisory Council is a mechanism to provide input. (e75; e85-97)

**Weaknesses:**

In regard to ensuring feedback and continuous improvement, no tools or strategies were developed for CTE partners, industry partners, or institutions of higher learning partners. No strategies or tools for eliciting feedback about new programmatic areas were included. Likewise, as many students would have left traditional schools for the CMO schools, helpful feedback from students was not included. (e75; e85-97)

**Reader's Score: 3**

**Priority Questions**

**Competitive Preference Priority - CPP 3: High School Students**

**1. Competitive Preference Priority 3: High School Students**

To receive points under this priority, an applicant must propose to --

- a. Replicate or expand high-quality charter schools to serve high school students, including educationally disadvantaged students;
- b. Prepare students, including educationally disadvantaged students, in those schools for enrollment in postsecondary education institutions through activities such as, but not limited to, accelerated learning programs (including Advanced Placement and International Baccalaureate courses and programs, dual or concurrent enrollment programs, and early college high schools), college counseling, career and technical education programs, career counseling, internships, work-based learning programs (such as apprenticeships), assisting students in the college admissions and financial aid application processes, and preparing students to take standardized college admissions tests;
- c. Provide support for students, including educationally disadvantaged students, who graduate from those schools and enroll in postsecondary education institutions in persisting in, and attaining a degree or certificate from, such institutions, through activities such as, but not limited to, mentorships, ongoing assistance with the financial aid application process, and

establishing or strengthening peer support systems for such students attending the same institution; and

d. Propose one or more project-specific performance measures, including aligned leading indicators or other interim milestones, that will provide valid and reliable information about the applicant's progress in preparing students, including educationally disadvantaged students, for enrollment in postsecondary education institutions and in supporting those students in persisting in and attaining a degree or certificate from such institutions. An applicant addressing this priority and receiving a CMO grant must provide data that are responsive to the measure(s), including performance targets, in its annual performance reports to the Department.

**Note:** For purposes of this priority, postsecondary education institutions include institutions of higher education, as defined in section 8101(29) of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESEA), and one-year training programs that meet the requirements of section 101(b)(1) of the Higher Education Act of 1965, as amended (HEA).

**Strengths:**

a) The applicant clearly states intention to replicate their CMO model, PHS, to 14 new sites and expand in 12 existing sites. These 26 sites (listed as 27 on pe22) are all high schools which will serve over 25,000 students over the life of the grant. (e16; e21-22)

b) Given the applicant's 20-year history of successful operation, specifically targeted to both disaffected and educationally-disadvantaged youth in high school, the applicant intends to provide sufficient postsecondary access and attainment. Mechanisms for achieving access and success include: character and leadership development, an array of services such as individual academic counseling plans geared to student need, the inclusion of industry-aligned career and technical education (CTE) resulting in dual enrollment credit, and importantly, flexible scheduling options are all included as part of the applicant's proposed plan. (e22-24)

c) The applicant provides an adequate plan to address support for enrollment in postsecondary pathways and to address attainment of postsecondary education. The applicant's key initiative, called Project PATH, is personalized to student interests as well as student educational needs. Project PATH has four strong, comprehensive components: use of a platform that assesses interests and aptitude; academic and alumnus counseling; financial support in identifying and obtaining scholarships; and a PATH center that containing print/digital resources. A student-centered model includes seven pathways to enroll in postsecondary education institution. (e23-24)

d) Quantifiable and appropriate performance measures are included as a part of the applicant's plan for replication/expansion. These include: 4-year graduation rates per campus; subsequent enrollment in postsecondary; persistence in postsecondary enrollment 2 years past high school graduation; and attainment of industry certification and job placement. An expansive list of 22 institutions of higher education (IHE) and 21 postsecondary training partners is provided. (e24-26; e72-73)

**Weaknesses:**

a) No weaknesses found. (e16; e21-22)

b) No weaknesses found. (e22-24)

c) No weaknesses found. (e23-24)

d) No weaknesses found. (e24-26; e72-73)

**Reader's Score: 2**



## Competitive Preference Priority - CPP4: Serve Native American Students

### 1. Competitive Preference Priority 4: Opening a New Charter School or Replicating or Expanding a High-quality Charter School to Serve Native American Students

To receive points under this priority, an applicant must --

a. Propose to open a new charter school, or replicate or expand a high-quality charter school, that—

1. Utilizes targeted outreach and recruitment in order to serve a high proportion of Native American students, consistent with nondiscrimination requirements contained in the U.S. Constitution and Federal civil rights laws;

2. Has a mission and focus that will address the unique educational needs of Native American students, such as through the use of instructional programs and teaching methods that reflect and preserve Native American language, culture, and history; and

3. Has or will have a governing board with a substantial percentage of members who are members of Indian Tribes or Native American organizations located within the area to be served by the new, replicated, or expanded charter school;

b. Submit a letter of support from at least one Indian Tribe or Native American organization located within the area to be served by the new, replicated, or expanded charter school; and

c. Meaningfully collaborate with the Indian Tribe(s) or Native American organization(s) from which the applicant has received a letter of support in a timely, active, and ongoing manner with respect to the development and implementation of the educational program at the charter school.

#### Strengths:

- a) Not noted.
- b) Not noted.
- c) Not noted.

#### Weaknesses:

- a) Not noted.
- b) Not noted.
- c) Not noted.

Reader's Score: 0

## Competitive Preference Priority - CPP5: Reopening Poor-Performing Schools

### 1. Competitive Preference Priority 5: Reopening Academically Poor-Performing Schools as Charter Schools.

To receive points under this priority, an applicant must --

a. Demonstrate past success working with one or more academically poor-performing public schools or schools that previously were designated as persistently lowest-achieving schools or priority schools under the former School Improvement Grant program or in States that exercised ESEA flexibility, respectively, under the Elementary and Secondary Education Act of 1965, as amended by the No Child Left Behind Act of 2001; and

b. Propose to use grant funds under this program to restart one or more academically

poor-performing public schools as charter schools during the project period by—

1. Replicating one or more high-quality charter schools based on a successful charter school model for which the applicant has provided evidence of success; and
2. Targeting a demographically similar student population in the replicated charter schools as was served by the academically poor-performing public schools

**Strengths:**

a) The applicant clearly provides evidence of working with one or more academically poor-performing public schools or schools that previously were designated as persistently lowest-achieving schools in the state. Three examples of public charter conversions are provided which include turning around iQ Academy as iSchool Virtual Academy, converting Fallbrook College Prep Academy into Fallbrook Classical Academy, and transforming Shekinah Radiance Academy into Heritage Academy, all successful turnarounds. Evidence is also provided of working with two traditional schools in the state, one in Austin and one in Beaumont. (e26-28)

b)

1. The applicant's plan is to work with a rural ISD in the western part of the state. The ISD's high school is a part of the proposed plan; approximately 250 students are targeted for inclusion in the applicant's PHS model of instruction and support. The applicant has grown from 700 to 18,000 students served in 20 years, serving students in two states. (e26-28)

2. As an entire district is being targeted, the students are the same. This satisfies the criteria of serving a similar population in the replicated charter schools as was served by the academically poor-performing public schools. (e28)

**Weaknesses:**

a) No weaknesses found. (e26-28)

b)

1) No weaknesses found. (e26-28)

2) No weaknesses found. (e28)

**Reader's Score:** 2

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**Status:** Submitted

**Last Updated:** 02/12/2020 04:41 PM

Status: Submitted

Last Updated: 02/12/2020 04:41 PM

## Technical Review Coversheet

**Applicant:** Responsive Education Solutions (S282M200006)

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

	Points Possible	Points Scored
<b>Questions</b>		
<b>Selection Criteria</b>		
<b>Quality of the Applicant and Adequacy Resources</b>		
1. Applicant and Resources	40	30
<b>Significance of Contribution in Assisting Students</b>		
1. Disadvantaged Students	20	15
<b>Quality of the Project Design and Evaluation Plan</b>		
1. Project Design/Evaluation	30	24
<b>Quality of Project Personnel and Management Plan</b>		
1. Personnel/Management	10	7
<b>Sub Total</b>	100	76
<b>Priority Questions</b>		
<b>Competitive Preference Priority</b>		
<b>CPP 3: High School Students</b>		
1. High School Students	2	2
<b>CPP4: Serve Native American Students</b>		
1. Native American Students	4	0
<b>CPP5: Reopening Poor-Performing Schools</b>		
1. Reopening Schools	2	2
<b>Sub Total</b>	8	4
<b>Total</b>	108	80

# Technical Review Form

Panel #3 - FY20 CMO - 3: 84.282M

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

Applicant: Responsive Education Solutions (S282M200006)

## Questions

### Selection Criteria - Quality of the Applicant and Adequacy Resources

#### 1. 1. Quality of the Eligible Applicant and Adequacy of Resources

In determining the quality of the eligible applicant, the Secretary considers the following factors:

Reader's Score: 30

#### Sub

1. a. The extent to which the academic achievement results (including annual student performance on statewide assessments, annual student attendance and retention rates, and, where applicable and available, student academic growth, high school graduation rates, college attendance rates, and college persistence rates) for educationally disadvantaged students served by the charter schools operated or managed by the applicant have exceeded the average academic achievement results for such students served by other public schools in the State.

#### Strengths:

Responsive Education Solutions (ResponsiveEd) provides some data on the key outcomes for all students as well as subgroups for Texas. Data for other public schools are included for comparative purposes (pages e22-e28, e276-e890). For example, three year trend data in reading in math on statewide assessments show an increase of 8 percentage points in reading and 14 points in math compared to statewide averages that increase 3 percentage points in both reading and math. In Arkansas, reading increased by 9 points compared to an 11 point decline statewide. On the state's accountability system, 97% of Premier High Schools received an A or B grade compared to 63% for the state's alternative public high schools and 58% of charter alternative high schools. High school graduation rates in Texas increased by 6.2% overall over a period of five years. For low-income students the rate was 6.7% and 6.5% for English Language Learners (ELLs). College attendance and persistence rates in Texas for 2016 show that 64% of Texas College Prep Academy students and 33% of Premier High School graduates were enrolled in college 2 years post high school graduation. Average daily attendance was 96.5% in 2018 compared to 95.4% for the state (pages e22-e28, e276-e890).

#### Weaknesses:

The applicant did not include data on educationally disadvantaged students in Texas. In Arkansas increases were reported for reading, but math rates were not reported. Graduation rates among subgroups in Arkansas were not reported (pages e22-e28, e276-e890).

Reader's Score: 6

2. b. The extent to which one or more charter schools operated or managed by the applicant have closed; have had a charter revoked due to noncompliance with statutory or

**Sub**

**regulatory requirements; or have had their affiliation with the applicant revoked or terminated, including through voluntary disaffiliation.**

**Strengths:**

ResponsiveEd clearly states that they have not had any charters revoked due to noncompliance with statutory or regulatory requirements, although they have made the decision to close 6 out of 80 schools over the past 20 years (pages e46-e47). They have provided reasons for the closures and their efforts to relocate students (pages e46-e47). Four of the six closures were due to facilities being unable to “accommodate the enrollment growth necessary to maintain financial viability.” In another case the campus merged with a nearby campus after the facility’s landlord refused to make necessary modifications to accommodate the school’s growing enrollment. In the other case, the community college satellite campus where the charter school was co-located was closed by the community college. The charter school was merged with another charter school campus.

**Weaknesses:**

ResponsiveEd does not discuss any lessons learned regarding the closures. They do not provide information on how they would avoid closures due to facility issues in the future or mitigate risks (pages e46-47).

**Reader's Score: 7**

- 3. c. The extent to which one or more charter schools operated or managed by the applicant have had any significant issues in the area of financial or operational management or student safety, or have otherwise experienced significant problems with statutory or regulatory compliance that could lead to revocation of the school's charter.**

**Strengths:**

ResponsiveEd provides a summary of their financial status. They include their most recent audit, information about their credit rating with Standard & Poor’s, and their bond rating (pages e47-50, e891-e945).

**Weaknesses:**

No weaknesses found.

**Reader's Score: 10**

- 4. d. The potential for continued support of the project after Federal funding ends, including, as appropriate, the demonstrated commitment of appropriate entities to such support.**

**Strengths:**

ResponsiveEd provides some information on their general plan for engaging in fund development (pages e48-e49, e139-e165). The staff member leading the fund development effort is well connected within Texas. ResponsiveEd states they are working to develop strong relationships with key foundations that support charter schools. The letters of support provide evidence of support for their program. The applicant has a policy that by the third year of operation a school must be self-sustaining (page e49). The proposed plan includes elements of best practice regarding operational practices, sound accounting practices, and sufficient fiscal management oversight and quality management controls. The chief of staff has a strong educational background as well as a relationship with the Walton Family Foundation and Bill and Melinda Gates Foundation. Numerous letters of support are included.

**Weaknesses:**

Although ResponsiveEd states that core operations for each school will be sustained with state per pupil funds by the third year of operation, there is not a budget supporting this claim (pages e48-e49). A budget for each school showing income from per pupil funds and expenditures is needed to confirm whether each school’s operations will be sustained by per pupil funding by the third year of operation. Limited detail on how they plan on “leveraging a strong network of education-focused donors to secure philanthropic dollars” (page e49) is provided. While receiving

**Sub**

a CSP grant in FY19 for the replication/expansion of 10 charter schools is a good accomplishment, the FY19 grant does not address the issue of support after Federal funding ends for this application nor does the prior grant provide financial support related to the current request.

**Reader's Score: 7**

**Selection Criteria - Significance of Contribution in Assisting Students**

**1. 2. Significance of Contribution in Assisting Educationally Disadvantaged Students**

**The Secretary considers the significance of contribution in assisting educationally disadvantaged students for the proposed project. In determining the significance of the contribution the proposed project will make in expanding educational opportunities for educationally disadvantaged students and enabling those students to meet challenging State academic standards, the Secretary considers the following factors:**

**Reader's Score: 15**

**Sub**

**1. 1. The extent to which charter schools currently operated or managed by the applicant serve educationally disadvantaged students, particularly students with disabilities and English learners, at rates comparable to surrounding public schools or, in the case of virtual charter schools, at rates comparable to public schools in the State.**

**Strengths:**

ResponsiveEd provides information on the percentage of students they are currently serving who are educationally disadvantaged across their schools. Data on percentages within each school are contained in Appendix F (pages e276-e890). They provide information on how they are currently serving educational disadvantaged students through their PHS curricula. They discuss achievement gains over the past 3 years, which show gains in reading and math across several subgroups and closing gaps between White and Black students. They are serving disadvantaged students: 92% of students in Texas PHS are identified as at-risk versus 50% statewide; 75% are low income compared to 68% of students located in districts where schools operate; 22% are English Language Learners (ELLs) compared to 25% in the local districts. In addition, 11% of students enrolled in Texas PHS are identified as having disabilities. This is higher than the 9% reported in local districts. Identified instructional strategies to meet the needs of EEL students include: project-based learning, working within cohorts, using technology within individualized learning plans, concentrated content progression, and independent, accelerated instruction (pages e50-e57).

**Weaknesses:**

ResponsiveEd has been operating charter schools for 20 years yet they only provided achievement gains for educationally disadvantaged students for the past 3 years (pages e50-e57, e276-e890). There is no explanation or note indicating why information was limited to 3 years. For some statements about gains ResponsiveEd does not provide supporting data. For example, "Additionally, both TCPA and PHS schools have demonstrated gains among subgroups of educationally disadvantaged students in graduation rates."

**Reader's Score: 8**

**2. 2. The quality of the plan to ensure that the charter schools the applicant proposes to replicate or expand will recruit, enroll, and effectively serve educationally disadvantaged students, particularly students with disabilities and English learners.**

**Sub**

**Strengths:**

ResponsiveEd provides information on a wide range of strategies and activities they plan to undertake to recruit and enroll students (pages e57-59). Their plan includes working with the local school districts to identify students who would be “be a good fit” for their program which they indicate has been successful strategy for engaging some of the most struggling students. Information about services for educationally disadvantaged students are described (pages e53-56). ResponsiveEd has an open enrollment that runs December through mid-January followed by lottery conducted in public if applications exceed the number of available seats (page e59).

**Weaknesses:**

ResponsiveEd indicates that recruitment and outreach activities are overseen by their Executive Director of Marketing. They do not identify the individual or include them as key personnel for this essential activity. Strategies for recruiting students or goals for increasing subgroup student population enrollments is not discussed. They do not have a different plan for new schools versus established schools. It is unclear who is assigned to carryout recruitment activities (page e58).

**Reader's Score: 7**

**Selection Criteria - Quality of the Project Design and Evaluation Plan**

**1. 3. Quality of the Project Design and Evaluation Plan for the Proposed Project**

**The Secretary considers the quality of the design of the proposed project. In determining the quality of the design of the proposed project, the Secretary considers the following factors:**

**Reader's Score: 24**

**Sub**

**1. 1. The extent to which there is a conceptual framework underlying the proposed research or demonstration activities and the quality of that framework.**

**Strengths:**

The conceptual framework is clear and complete (pages e22, e60-e62). The applicant proposes to include 2 new research-based components to their program. The proposed components are: Capturing Kids Hearts and a Career and Technical Education program. The Capturing Kids Hearts program is based on self-efficacy work of Bandura and addresses staff capacity to demonstrate caring and positive behavior. Research studies conducted on Capturing Kids Hearts indicate significant gains in pro-social behaviors as precursors to academic achievement.

**Weaknesses:**

No weaknesses found.

**Reader's Score: 5**

**2. 2. The extent to which the methods of evaluation include the use of objective performance measures that are clearly related to the intended outcomes of the proposed project, as described in the applicant's logic model, and that will produce quantitative and qualitative data by the end of the grant period.**

**Sub**

**Strengths:**

The logic model is comprehensive and the evaluation plan is clearly articulated (pages e62-e71). The logic model includes inputs, activities, outputs, outcomes, performance measures, and results. An experienced, external evaluator is collecting and analyzing the data. The evaluation methods are aligned to the performance measures. Both qualitative and quantitative data are collected. Surveys will be available in English as well as Spanish. Data are used to inform both formative and summative measures. Student data is comprehensive and includes state assessment (STAAR, TELPAS, EoCs) data in reading and math in Texas. The ACT Aspire in Arkansas is similar to the STAAR in Texas. Dynamic Learning Maps is also used in Arkansas to measure student achievement in reading and math. Analysis methods are strong and will include using Chi Square and McNemar tests. There is a plan to measure adequacy of implementation and use data for continuous improvement.

**Weaknesses:**

No weaknesses found.

**Reader's Score: 10**

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

**Strengths:**

The performance measures specified under the 4 project goals are clear and measurable (pages e64, e71-e74). All goals are attainable. For example, the goal to improve opportunities for educationally disadvantaged students to meet state standards has a target of increasing the proportion of students who pass their English course with a score of 80% or higher by 2% points in each year of the grant compared (page e73).

**Weaknesses:**

ResponsiveEd proposes an increase of 3 percentage points each year in Y2 through Y5 which amounts to a 12 percentage points by Y5 from baseline (Y1). This may not be realistic. ResponsiveEd reports that PHS schools in Texas showed a 2.2 percentage point increase in four-year high school graduation rates (page e44). Over the past three years the graduation rate increased by 6.2 percentage points for all students. No explanation or justification is provided that the accumulated growth is achievable given past performance. Additionally, ResponsiveEd states they will increase the proportion of graduates from replicated or expanded PHS charters who enroll in postsecondary educational programs by 3 percentage points in Years 2-5 of the grant compared with baseline data collected in Y1 (PM2.3, page e73) Since the measures do not differentiate between replication and expansion sites the aggregate gains may be disproportionately from expansion sites. For replication schools it may not be reasonable to expect students who enroll as juniors in Y1 to graduate at a rate of 3 percentage points higher in Y2 than students who enroll as seniors in Y1.

**Reader's Score: 3**

**4. 4. The extent to which the design for implementing and evaluating the proposed project will result in information to guide possible replication of project activities or strategies, including information about the effectiveness of the approach or strategies employed by the project.**

**Strengths:**

ResponsiveEd outlines plans for using data from multiple sources at various times throughout the year to inform the project. They also plan to engage stakeholders, including students, in the process. For example, ResponsiveEd includes monthly communication and bi-annual reports in their plan. This will provide opportunities for feedback. Community Advisory Councils will review and provide feedback. Results will be shared through attendance at local conferences, regional and national charter school conferences (pages e74-e76).



**Sub**

**Weaknesses:**

The discussion about project plans for documenting outcome evidence and lessons learned includes some information about the components but lacks details on how the information will be used for continuous improvement (e70-75). For example, qualitative data from interviews, focus groups, site visits and surveys will be shared with campus directors as lessons learned regarding effectiveness of program implementation but does not indicate how this information will be incorporated into the decision-making process (page e75). Replication was not addressed. Also, it is unclear how members of the Community Advisory Council will be recruited or selected (e70-75).

**Reader's Score: 6**

**Selection Criteria - Quality of Project Personnel and Management Plan**

**1. 4. Quality of Project Personnel and Management Plan**

The Secretary considers the quality of the personnel who will carry out the proposed project and the quality of the management plan for the proposed project. In determining the quality of project personnel, the Secretary considers the extent to which the applicant encourages applications for employment from persons who are members of groups that have traditionally been underrepresented based on race, color, national origin, gender, age, or disability.

In addition, the Secretary considers:

**Reader's Score: 7**

**Sub**

**1. 1. The qualifications, including relevant training and experience, of key project personnel.**

**Strengths:**

ResponsiveEd provides a summary of qualifications of key personnel relevant to the opening, operation, and management of the proposed charter schools (pages e75-e76, e77-e86, e91-e138). The organizational structure is adequate to achieve continued expansion. The leadership includes individuals responsible for special education, finance, technical programming, accounting, learning, research and evaluation, human resources, and communication. Key staff possess the appropriate experience and expertise for their positions which relevant to the success of their plan. For example, the chief executive officer is one of the individuals responsible for the vision of the organization and its growth over the past 20 years. The organization is recognized for its leadership in charter school growth in Texas. The application also includes information about ResponsiveEd's Executive Director of Research and Evaluation who will have leadership responsibility for the grant and a job description for grant manager who will be hired.

**Weaknesses:**

Resumes are not included for Director of CTE and Executive Director of Special Education, Dyslexia, and Section 504 Services. Staffing from underrepresented groups is not addressed.

Sub

Reader's Score: 4

**2. The adequacy of procedures for ensuring feedback and continuous improvement in the operation of the proposed project.**

**Strengths:**

ResponsiveEd provides some information about the quality standards they developed in 2012 and have refined each year (pages e85-e88). The plan demonstrates adequate procedures to ensure feedback and ongoing improvement through a set of 8 standards developed by the applicant. For example, the standards cover such things as mission and vision as well as learning and fiscal responsibility. Their Quality Standards Review (QSR) informs their decision-making process. ResponsiveEd also has a 360-review process that demonstrates a commitment to a robust staff-evaluation and performance assessment.

**Weaknesses:**

There is little information about how ResponsiveEd collects and uses the data related to the eight standards beyond that each standard has multiple indicators and they use a rating scale from 1-4. It is unclear what strategies or tools will be used for gathering information on the new CTE program areas. There is a lack information on the process for making course-correction (pages e75, e85-e97).

Reader's Score: 3

**Priority Questions**

**Competitive Preference Priority - CPP 3: High School Students**

**1. Competitive Preference Priority 3: High School Students**

To receive points under this priority, an applicant must propose to --

- a. Replicate or expand high-quality charter schools to serve high school students, including educationally disadvantaged students;
- b. Prepare students, including educationally disadvantaged students, in those schools for enrollment in postsecondary education institutions through activities such as, but not limited to, accelerated learning programs (including Advanced Placement and International Baccalaureate courses and programs, dual or concurrent enrollment programs, and early college high schools), college counseling, career and technical education programs, career counseling, internships, work-based learning programs (such as apprenticeships), assisting students in the college admissions and financial aid application processes, and preparing students to take standardized college admissions tests;
- c. Provide support for students, including educationally disadvantaged students, who graduate from those schools and enroll in postsecondary education institutions in persisting in, and attaining a degree or certificate from, such institutions, through activities such as, but not limited to, mentorships, ongoing assistance with the financial aid application process, and establishing or strengthening peer support systems for such students attending the same institution; and
- d. Propose one or more project-specific performance measures, including aligned leading indicators or other interim milestones, that will provide valid and reliable information about the applicant's progress in preparing students, including educationally disadvantaged students, for enrollment in postsecondary education institutions and in supporting those students in persisting in and attaining a degree or certificate from such institutions. An applicant addressing this priority and receiving a CMO grant must provide data that are responsive to the measure(s), including performance targets, in its annual performance reports to the Department.

**Note: For purposes of this priority, postsecondary education institutions include institutions of higher education, as defined in section 8101(29) of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESEA), and one-year training programs that meet the requirements of section 101(b)(1) of the Higher Education Act of 1965, as amended (HEA).**

**Strengths:**

- (a). ResponsiveEd intends to replicate their program model in 14 new sites and expand in 12 existing sites. All proposed sites are high schools that will serve over 25,000 students over the grant period (page e22).
- (b). ResponsiveEd has a 20-year history of successful operation and specifically serving educationally-disadvantaged students in high school. There is evidence of sufficient postsecondary access and attainment. Mechanisms for achieving access and success include: character and leadership development, individualized academic counseling plans, the inclusion of industry-aligned career and technical education resulting in dual enrollment credit, and flexible scheduling options (pages e22-e23).
- (c). The plan addresses support for enrollment in postsecondary and attainment. Project PATH, the key initiative, has 4 strong, comprehensive components: use of a platform that assesses interests and aptitude; academic and alumnus counseling; financial support; identifying and obtaining scholarships; and a PATH center that containing print/digital resources (pages e23-e24).
- (d). Performance measures are appropriate and quantifiable. Measures include 4 year graduation rates, postsecondary enrollment, postsecondary persistence at 2 years following high school graduation, and attainment of industry certification and job placement (pages e24-e25).

**Weaknesses:**

- (a). No weaknesses found.
- (b). No weaknesses found.
- (c). No weaknesses found.
- (d). No weaknesses found.

**Reader's Score: 2**

**Competitive Preference Priority - CPP4: Serve Native American Students**

**1. Competitive Preference Priority 4: Opening a New Charter School or Replicating or Expanding a High-quality Charter School to Serve Native American Students**

**To receive points under this priority, an applicant must --**

**a. Propose to open a new charter school, or replicate or expand a high-quality charter school, that—**

**1.Utilizes targeted outreach and recruitment in order to serve a high proportion of Native American students, consistent with nondiscrimination requirements contained in the U.S. Constitution and Federal civil rights laws;**

2. Has a mission and focus that will address the unique educational needs of Native American students, such as through the use of instructional programs and teaching methods that reflect and preserve Native American language, culture, and history; and

3. Has or will have a governing board with a substantial percentage of members who are members of Indian Tribes or Native American organizations located within the area to be served by the new, replicated, or expanded charter school;

b. Submit a letter of support from at least one Indian Tribe or Native American organization located within the area to be served by the new, replicated, or expanded charter school; and

c. Meaningfully collaborate with the Indian Tribe(s) or Native American organization(s) from which the applicant has received a letter of support in a timely, active, and ongoing manner with respect to the development and implementation of the educational program at the charter school.

**Strengths:**

Applicant does not address this CPP.

**Weaknesses:**

Applicant does not address this CPP.

**Reader's Score: 0**

**Competitive Preference Priority - CPP5: Reopening Poor-Performing Schools**

**1. Competitive Preference Priority 5: Reopening Academically Poor-Performing Schools as Charter Schools.**

To receive points under this priority, an applicant must --

a. Demonstrate past success working with one or more academically poor-performing public schools or schools that previously were designated as persistently lowest-achieving schools or priority schools under the former School Improvement Grant program or in States that exercised ESEA flexibility, respectively, under the Elementary and Secondary Education Act of 1965, as amended by the No Child Left Behind Act of 2001; and

b. Propose to use grant funds under this program to restart one or more academically poor-performing public schools as charter schools during the project period by—

1. Replicating one or more high-quality charter schools based on a successful charter school model for which the applicant has provided evidence of success; and

2. Targeting a demographically similar student population in the replicated charter schools as was served by the academically poor-performing public schools

**Strengths:**

(a). ResponsiveEd has experience turning around failing schools(e26-e28). They have successfully taken over and turned around 4 charter schools over the past 9 years as well as partnering with Austin ISD to operate two in-district schools and with Beaumont ISD to operate a failing elementary school and convert to a classical academy. Application includes letter from Beaumont supporting ResponsiveEd's information about partnership and early indications of success despite delays due to the tropical storm in fall 2019.

(b1) ResponsiveEd provides clear evidence that its program is successful. It has grown from 700 students to 18,000 students in two states (pages e28-e29)

(b2). ResponsiveEd is targeting an entire district with similar students (page e29). This satisfies the criteria.

**Weaknesses:**

(a). No weaknesses found.

(b1) No weaknesses found.

(b2). No weaknesses found.

**Reader's Score:**     **2**

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