U.S. Department of Education - EDCAPS G5-Technical Review Form (New) Status: Submitted Last Updated: 06/30/2023 03:49 PM

Technical Review Coversheet

Applicant:Indiana Department of Education (S282A230012)Reader #1:**********

		Points Possible	Points Scored
Questions			
Selection Criteria			
Quality of Project Design			
1. Quality of Project Design		35	29
Quality of Eligible Applicants Receiving Subgrants 1. Eligible Applicants		15	14
State Plan			
1. State Plan		35	30
Quality of the Management Plan			
1. Management Plan		15	13
	Sub Total	100	86
Priority Questions			
Competitive Preference Priority 1			
Competitive Preference Priority 1			
1. CPP1		1	1
	Sub Total	1	1
Competitive Preference Priority 2			
Competitive Preference Priority 2			
1. CPP2		2	2
	Sub Total	2	2
Competitive Preference Priority 3			
Competitive Preference Priority 3			
1. CPP3		2	2
	Sub Total	2	2
Competitive Preference Priority 4			
Competitive Preference Priority 4			
1. CPP4		2	2
	Sub Total	2	2
Competitive Preference Priority 5			
Competitive Preference Priority 5			
1. CPP5		3	3
	Sub Total	3	3

Total

110

96

Technical Review Form

Panel #7 - State Entities - 10: 84.282A

Reader #1:*********Applicant:Indiana Department of Education (S282A230012)

Questions

Selection Criteria - Quality of Project Design

1. 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:

Reader's Score: 29

Sub

1. The extent to which the proposed project demonstrates a rationale;

Strengths:

The applicant demonstrates a sound rationale and proposes to open a reasonable average number of ten new charter schools during each year of the grant, along with one or two expansions of high-quality charters each year (p. e37). The applicant arrives at this number by polling the state's largest authorizers about the number of schools they anticipate opening in the next few years and by looking at the number of charters the state has opened annually in the past few years (p. e47).

The applicant will support these efforts through a rigorous RFP for charters to obtain subgrants and through regular, robust monitoring of subgrantees (p. e42).

Additionally, the applicant effectively describes how its work with partners will help support the new and replicating CSPs, through professional development activities, fellowship programs, and other activities. They also highlight an existing partnership in Indianapolis that has a track record of launching and supporting quality schools (p. e39-40).

The applicant discusses how it will work to support charters in LEAs with a significant number of schools that IDOE has identified for comprehensive support and improvement (p. e37).

Weaknesses:

The application describes how many charters are located in high-need areas but does not provide sufficient detail for why its design will lead to more schools in LEAs that need more quality seats. The application states, "IDOE has no reason to believe that there will be less interest in serving students in these areas in the future" (p. e38).

Although the applicant describes ways to share best practices and encourage collaboration between charters, there was not a cohesive strategy presented on collaboration and sharing of best practices between charter schools and other public schools (p. e23-e24).

Reader's Score: 3

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 project and will produce quantitative and qualitative data to the extent possible; and

Strengths:

The applicant presents performance measures that are specific, measurable, achievable, relevant and timely (p. e28-29). For example, between 2025-26 and 2028-29, the applicant plans to open 50 new schools. The goal was designed alongside a review of charter openings and with input from large authorizers in the state. It is relevant to the overarching goal the application and is specific, measurable, and timely (p. e45-46). Each goal also can be measured annually.

Weaknesses:

The application lacked qualitative performance measures (p.e41-44).

Reader's Score:

4

3. The ambitiousness of the State entity's objectives for the quality charter school program carried out under the CSP State Entity program

Strengths:

The State provides ambitious yet attainable objectives. In coming up with the number of subgrantees per year, the state consulted with its largest authorizer and analyzed data on past charter school growth (p. e47). As the applicant explains, "Based on charter authorizer estimates and past actual openings, IDOE believes an average of 10 subgrants per year is both realistic and ambitious" (p. e48).

Weaknesses:

The reviewer was unable to find sufficient data indicating that Indiana will be able to support this type of charter growth. The application did not provide information on charter enrollment that supported the new schools planned. And while a large number of charters were opened in 2020-21 and 2021-22, the number opened in 2021-22 were just over half of the number opened the previous year (p. e47).

Reader's Score: 4

4. The extent to which the projected number of subgrant awards for each grant project year is supported by evidence of demand and need, and the extent to which the proposed average subgrant award amount is supported by evidence of the need of applicants

Strengths:

The applicant adequately details its reasons for expecting to fund an average of 10 subgrants per year, allowing subgrantees to request the maximum subgrant allowed **states** (p. e48). The applicant also acknowledges that award size may vary (p. e48). To determine the projected number of awards, the applicant consulted with the state's largest authorizers and reviewed past openings of new charter schools (p. e47). They reviewed the startup budgets for several Hoosier schools that met three criteria: having strong financial positions; have replicated or started new schools multiple times; and have plans to continue replicating (p. e48).

Weaknesses:

The applicant describes requesting subgrants based on a review of "several" charter schools, but the schools used all seem to be for high schools (p. e49). It would have strengthened the response if the applicant had also reviewed budgets for elementary and middle schools, as high schools tend to have higher budgets.

Reader's Score: 18

Selection Criteria - Quality of Eligible Applicants Receiving Subgrants

1. The likelihood that the eligible applicants receiving subgrants under the program will meet the State entity's objectives for the quality charter school program and improve education results for students.

Strengths:

The applicant has received a State Entities CSP grant in the past and is building off successful practices in place (p. e49).

The applicant describes a plan that has detailed descriptions of activities, timelines, and processes. There is a detailed timeline (p. e54-55). There is a newsletter sent weekly from the Department of Education to all charters, which can also serve as an important vehicle for communicating information about the CSP subgrant process (p. e49). A Moodle course provides additional information for CSP (p. e50).

The applicant describes in great detail how it will work with eligible applicants to support the opening of new charter high schools (p. e50-51).

The applicant presents a strong review process for subgrantees, and due to its experience with prior CSP State Entity awards, already has a team of peer reviewers trained and willing to review new applications (p. e53).

Weaknesses:

Although the applicant briefly discusses how the subgrant process will support rural communities, there is not much detail provided (p. e50). For example, the applicant briefly mentions that Purdue Polytech has plans to expand into larger cities and smaller towns (p. e50). Much more explanation is provided about high schools than how the CSP will support rural charters.

Reader's Score: 14

Selection Criteria - State Plan

1. The State entity's plan to--

Reader's Score: 30

Sub

1. Adequately monitor the eligible applicants receiving subgrants under the State entity's program;

Strengths:

The applicant presents a very comprehensive monitoring plan that will help monitor subgrantees and identify risk, along with addressing deficiencies.

Technical assistance will be provided before subgrants are awarded, which will help applicants for subgrants receive technical assistance (p. e63). The Department also provides annual training for federal program directors and charters and districts schools that will help ensure comprehensive understanding of requirements and deadlines (p. e64).

The applicant utilizes a risk assessment tool that helps monitors understand the level of technical assistance and oversight needed for each subgrantee (p. e65). Additionally, on-site visits will be provided by the Department (p. e65).

Weaknesses:

The applicant did not detail how it would provide transparency so that monitoring findings and corrective action plans were available to families and the public (p. e65).

Reader's Score: 8

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

Strengths:

The applicant has a solid plan to work with authorizers to ensure monitoring is streamlined. The applicant will use information gleaned from authorizer annual reports, to the extent possible (p. e65). The applicant is committed to engaging with authorizers about the CSP subgrant process so that they can work together to reduce administrative burdens on the school. The applicant recognizes the extensive due diligence used by authorizers when they approve new school applications and takes that into consideration as part of the subgrantee process (p. e66).

Weaknesses:

No weaknesses found.

Reader's Score: 5

3. Provide technical assistance and support for--

i. The eligible applicants receiving subgrants under the State entity's program; and

ii. Quality authorizing efforts in the State;

Strengths:

The applicant provides sufficient information on how it helps authorizers obtain the data they need to complete annual reviews and get important information about student performance, growth, and gaps (p. e 68). State law requires that charter information is available in one place on the State department of education's website (p. e68).

With relation to authorizing, the applicant will contract with an organization that helps support authorizers and will make funds available for authorizers to attain consulting support (p. e68).

Weaknesses:

Although the applicant describes in some detail how authorizers ensure all students learn about charter opportunities, they do not discuss in sufficient detail how they will help sub grantees not just with recruitment, but also enrollment and retention (p. e67-68). Along the same lines, the application highlights a nonprofit that supports enrollment in Indianapolis, but it is unclear how subgrantees outside of the state's capital will receive similar help in equitably enrolling students (p. e67). They mention a "rich set of organizations" but only organizations in Indianapolis are mentioned.

Reader's Score: 8

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

Strengths:

State law requires public hearings for charter applications, which provide an important opportunity for parents and community members to weigh in on the process (p. e69). The applicant sufficiently detailed how it will work with authorizers to collect and analyze surveys from parents (and recognizing that many authorizers already do this, the applicant pledges to not collect information in an unnecessarily duplicative way) (p. e 69).

Weaknesses:

The applicant mentions that "most" authorizers evaluate parent and community involvement, but more detail here would be helpful. The applicant does not explain how the state will evaluate involvement from applicants if the authorizer does not look at parent and community involvement, or if it insufficiently looks at parent and community involvement (p. e69).

Reader's Score: 4

5. The degree of flexibility afforded by the State's charter school law and how the State entity will work to maximize the flexibility provided to charter schools under such law.

Strengths:

The applicant explains in great detail the many flexibilities afforded to charters in the state. Charters are fiscally and legally autonomous, with independent boards (p. e70). They cannot be required to purchase services from their authorizers (p. e70). They are exempt from many laws that apply to other schools, and the laws which they are required to follow are clearly stated in law (p. e70).

The applicant is also committed to protecting charter autonomy. It does not require school participation in trainings that are not required by law, and allows authorizers, as appropriate, to determine how charters can meet some statutory requirements, such as teacher evaluation plans (p.e70).

Weaknesses:

No weaknesses found.

Reader's Score: 5

Selection Criteria - Quality of the Management Plan

1. The Secretary considers the quality of the management plan for the proposed project. In determining the quality of the management plan for the proposed project, the Secretary considers:

Reader's Score: 13

Sub

1. The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks

Strengths:

The applicant has a solid plan to ensure the project will be on time and within budget. There are clearly defined responsibilities timelines, and milestones.

There will be two 1.0 FTE charter school specialists who will oversee CSP grant oversight and assistance (p. e73).

Staff resumes indicate they have the experience needed (pages e.80-e.84).

Weaknesses:

The applicant describes collecting and analyzing parent data in the application, but this is not mentioned in the logic model (p. e71).

Reader's Score: 9

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

Strengths:

The applicant effectively explains its commitment to work with subgrantees after each cycle and use their feedback to improve processes moving forward (p. e72)

The application is replete with other references about how the applicant will gather and incorporate feedback as they continuously improve the process. For example, the applicant will leverage their strong relationships with authorizers to identify areas where they can rely on authorizers' information about applicants. Doing so can streamline processes and reduce the burdens on schools (p. e65-e66).

The applicant also plans to engage parents and community members to ensure their input helps influence operations of schools (p. e69).

Weaknesses:

The applicant did not detail the procedures they would use for obtaining parent feedback (p.e72, e197).

Reader's Score: 2

3. The extent to which the time commitments of the project director and principal investigator and other key project personnel are appropriate and adequate to meet the objectives of the proposed project.

Strengths:

The applicant presents detailed information on time commitments, which are appropriate and adequate to meet the objectives. The applicant plans to use part of its 3 percent administrative set aside to support the Charter Specialist role; that person will be in charge of administering the application (p. e72).

Lacey Bohlen is the project director and has substantial experience with federal programs and the CSP (p. e82), as she has worked with them since 2019.

Weaknesses:

No weaknesses found.

Reader's Score: 2

Priority Questions

Competitive Preference Priority 1 - Competitive Preference Priority 1

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

a. Allows at least one entity that is not a local educational agency (LEA) to be an authorized public chartering agency for

developers seeking to open a charter school in the State ; or

b. In the case of a State in which LEAs are the only authorized public chartering agencies, the State has an appeals process for

the denial of an application for a charter school.

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

Please specify whether they meet (a) or (b) and clearly explain why in the strengths.

(0 or 1 points)

Strengths:

Indiana provides a number of authorizing entities that are not LEAs. In addition to LEAs, the following can authorize in Indiana: a state charter board; a state educational institution that offers a four-year baccalaureate degree; the governing board of a nonprofit college or university that offers a four-year baccalaureate degree or advance degree; and the Mayor's Office of Indianapolis (p.e22-23).

Weaknesses:

No weaknesses found.

1

Reader's Score:

Competitive Preference Priority 2 - Competitive Preference Priority 2

1. To be eligible to receive points under this priority, a State entity must demonstrate that it is located in a state that ensures equitable financing, as compared to traditional public schools, for charter schools and students in a prompt manner.

(up to 2 points)

Strengths:

Charters receive state tuition support similarly to traditional district schools (p. e23). There is a per pupil foundation grant, regardless of location or need, and schools receive the per pupil grant based on average daily membership (p.e23-24). In addition to the base tuition, there is also categorical funding including the Honors Grant, the Special Education Grant, and the Complexity Grant, which awards additional money to schools at greater risk (p.e24). Charter schools and districts schools and "equally eligible for all state grant funds" described above (p.e24). Also, new legislation requires property tax

dollars generated above the baseline to be shared with charter schools on a pro rata basis (p.e25).

Weaknesses:

No weaknesses noted.

Reader's Score: 2

Competitive Preference Priority 3 - Competitive Preference Priority 3

1. To be eligible to receive points under this priority, a State entity must demonstrate that it is located in a state that uses best practices from charter schools to help improve struggling schools and LEAs.

(up to 2 points)

Strengths:

The application describes the Innovation Schools and Networks, which allow teachers or administrators governing boards of traditional schools to form a charter-like school which has full operational autonomy and flexibility (p. e27). The purpose of Innovation Schools is to allow schools use additional flexibility to make organizational and programmatic decisions based on the needs to the school to provide a better education (p. e28). The applicant describes a few Innovation Schools and Networks that are showing promise (p. e28). Of the 24 innovation network schools currently serving over 10,000 students, the majority of students (over 84 percent) are students of color, and more than 75 percent quality for free or reduced lunch (p. e28).

Weaknesses:

No weaknesses noted.

Reader's Score: 2

Competitive Preference Priority 4 - Competitive Preference Priority 4

- 1. To be eligible to receive points under this priority, a State entity must demonstrate that it is located in a State that provides charter schools one or more of the following:
 - a) Funding for facilities
 - b) Assistance with facilities acquisition
 - c) Access to public facilities
 - d) The ability to share in bonds or mill levies
 - e) The right of first refusal to purchase public school buildings
 - f) Low- or no-cost leasing privileges

(up to 2 points)

Strengths:

The applicant clearly demonstrates that it provides schools with one or more of the following ways listed above to help obtain and secure a facility. For example, Indiana provides charter schools with the right of first refusal to purchase public school buildings (p.e31). Certain schools also can obtain per pupil funding for facilities (p. e29). Also, with approval of the members of a school district governing body, charters may explicitly receive proportional distributions of a school's corporation capital project fund (p. e30).

No weaknesses found.

2

Reader's Score:

Competitive Preference Priority 5 - Competitive Preference Priority 5

1. To be eligible to receive points under this priority, a State entity must demonstrate that it supports charter schools that serve at-risk students through activities such as dropout prevention, dropout recovery, or comprehensive career counseling services.

(up to 3 points)

Strengths:

The applicant describes a variety of models of serving students at risk of dropping out, including the Goodwill Education Initiatives Excel Schools (p. e31). Indiana also has an alternative accountability system for such schools, which is an important tool for helping states assess the quality of these schools. The state also has a charter school that serves students with disabilities (p. e32) and students recovering from substance abuse and addiction (p. e32).

Weaknesses:

No weaknesses found.

Reader's Score: 3

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Technical Review Coversheet

Applicant:Indiana Department of Education (S282A230012)Reader #2:**********

		Points Possible	Points Scored
Questions			
Selection Criteria			
Quality of Project Design			
1. Quality of Project Design		35	29
Quality of Eligible Applicants Receiving Subgrants 1. Eligible Applicants		15	14
State Plan			
1. State Plan		35	30
Quality of the Management Plan			
1. Management Plan		15	12
	Sub Total	100	85
Priority Questions			
Competitive Preference Priority 1			
Competitive Preference Priority 1			
1. CPP1		1	1
	Sub Total	1	1
Competitive Preference Priority 2			
Competitive Preference Priority 2			
1. CPP2		2	2
	Sub Total	2	2
Competitive Preference Priority 3			
Competitive Preference Priority 3			
1. CPP3		2	2
	Sub Total	2	2
Competitive Preference Priority 4			
Competitive Preference Priority 4			
1. CPP4		2	2
	Sub Total	2	2
Competitive Preference Priority 5			
Competitive Preference Priority 5			
1. CPP5		3	3
	Sub Total	3	3

Total

110

95

Technical Review Form

Panel #7 - State Entities - 10: 84.282A

Reader #2:*********Applicant:Indiana Department of Education (S282A230012)

Questions

Selection Criteria - Quality of Project Design

1. 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:

Reader's Score: 29

Sub

1. The extent to which the proposed project demonstrates a rationale;

Strengths:

The applicants project, Quality Counts II, aims to expand the public charter school sector with the opening of new high-quality charter schools and expansion of existing charter schools (p. e37). The applicant presents a convincing narrative around the current state of school districts in improvement. Developing innovative network schools is a component of the applicant's rationale, and the applicant provides ample evidence that this approach is a best practice. Substantiating the performance objectives for students, the applicant presents ample data that its programs have established a significantly lower achievement gap in historically underserved populations. For example, the Black/White achievement gap at Innovative Charters is 7.5% as compared to State statistics of 26.7% (p. e 38). This is a ~70% closure of the gap noted in the State statistics.

The selection process shared by the applicant includes application and interviews. This two-stage process operates as a reasonable control to ensure that the selected charter organization is anticipated to confer educational benefits to the students it serves (p. e40).

The support for new school leaders is laudable and a best practice, and general examples of this support such as developing your school's brand are noted (p. e40).

Weaknesses:

While the applicant provides for governance and other pre-launch support activities, there are sparse specifics for these pre-launch supports for the charter organization by the SEA (p. e39). While the aforementioned support for new leaders is a strength, the lack of specifics around the topics presented does not fully inform the rationale for the project.

Reader's Score: 3

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 project and will produce quantitative and qualitative data to the extent possible; and

Strengths:

The applicant presents four measurable objectives that are aligned to the project. An example of this alignment is the capacity building objective for selected charter schools (p. e41). The activities/strategies, outputs/deliverables, and overall outcomes are reasonably and adequately defined and likely to produce both qualitative and quantitative data for the project. For example, Objective 1 provides for quantitative data around baseline improvements in the number of charter schools operating in the State (p. e45). The GPRA measures in the annual performance report are reasonable for this objective. An outcome from this example (p. e47) is around estimates of demand for charter schools and, as such, operates to inform financial capacity necessary for future endeavors (p. e48).

Qualitative data collection is accessed in some of the stated objectives. The assessment of the portfolio is quantitatively weighted, there may be some qualitatively determined data that informs Objective 2. For example, the applicant will administer surveys to applicants and awardees to assess the quality of support services (p. e43). There is some potential qualitatively determined data collection in Objective 3 insomuch that the continuously identified best practices could be interpreted as qualitative data.

Weaknesses:

The applicant does not adequately address the Secretary's criterion around qualitative data. For example, the applicant includes professional development on Objective 1, but does not discuss methods for measuring its efficacy (p. e42). Another example of the lack of specificity is in Objective 3. The IDOE will analyze data (p. e44) but it does not adequately indicate that it uses any qualitatively determined methods; in fact, it appears to be quantitative data sources (e.g., race, socioeconomic status, homelessness, etc.). While these examples imply possible qualitatively determined methods in Objective 4, it is insufficient to fully meet this criterion's expectation.

Reader's Score: 3

3. The ambitiousness of the State entity's objectives for the quality charter school program carried out under the CSP State Entity program

Strengths:

The applicant presents comprehensive and detailed objectives for the program. The growth objectives are ambitious and realistic. The applicant's recognition that unbridled growth can be an inhibitor to efficacy (p. e49). For example, data presented by the applicant shows a range of 5-13 charter school openings each year since 2013-14 school year (p. e47) with an average of 9 charter schools per year (p. e47). The current plan is to open 10 charter schools per year; this is consistent with past performance and is at the higher range noted. This, then, is evidence of ambitiousness stipulated by the Secretary.

The applicant's authorizing process informs estimates of need (p. e47). The applicant has an innovative approach to allow requests to the maximum of with controls such as well-designed plans/budgets to justify the charter school organization's requests (p. e48).

Weaknesses:

No weaknesses noted.

Reader's Score: 5

4. The extent to which the projected number of subgrant awards for each grant project year is supported by evidence of demand and need, and the extent to which the proposed average subgrant award amount is supported by evidence of the need of applicants

Sub

Strengths:

The applicant presents a sound and thorough plan that assesses the needs for charter schools along with the financial needs to meet the objectives in the awards. The applicant intends to provide 10 subgrants per year for 5 years (p. e46). The amount of the subgrants vary according to the needs of the individual requests. Included are two subgrants of the may be awarded each year for school expansions (p. e46). The applicant stipulates (p. e46) that each subgrant will be at an average of

Weaknesses:

The reliance on high school budgets and financials by the applicant to estimate the financial need for charter schools does not include K-8 estimates, which may require less funding. The lack of additional specifics for charter schools other than high schools does not fully inform the financial demand and need for this criterion.

Reader's Score: 18

Selection Criteria - Quality of Eligible Applicants Receiving Subgrants

1. The likelihood that the eligible applicants receiving subgrants under the program will meet the State entity's objectives for the quality charter school program and improve education results for students.

Strengths:

The applicant has qualified experience in administering a CSP grant. Included in the applicant's theory of action is its definition of high-quality (p. e51). This is well within the criterion's stated goal. The development of communication processes within the charter school community supports the Secretary's intention in this criterion. For example, weekly briefs of grants, trainings, studies, and other timely information informs the likelihood that subgrantees will continue to meet the applicant's objectives (p. e49).

Other devices such as Moodle courses are reasonably consistent communication strategies for explaining and controlling grant objectives (p. e50). The use of virtual sessions to inform adherence to the State entity's objectives provides convincing evidence of practice to align with the Secretary's criterion.

Sound evidence of practice in the RFP application and peer review for selecting exemplary applicants (p. e53) is a specific, justified, and best practice in meeting the spirit and specifications in this criterion (p. e51). Together with technical assistance provided by the SEA (p. e51), it is reasonable that applicants will continue to meet the objectives; this, then, would reasonably confer an educational benefit to the students that the charter school program serves.

The use of signed assurances of adherence to the activities from the charter school applicants further demonstrates alignment to the Secretary's criterion (p. e53) by providing internal controls of implementation.

The applicant presents a thoughtful and sound plan that provides comprehensive strategies to ensure eligible applicants will meet the SEA's objectives (p. e62). An example of this commitment is the community-centered approach and ongoing engagement with current/former educators to inform the SEA's assessment of likelihood of the success by the eligible applicants (p. e62).

Weaknesses:

The applicant states that all school leaders read the newsletter from the SEA (p. e49). This is not well established in the narrative, and while it may be likely there is no provided data to suggest that all leaders read—and by extension—better understand the objectives in the subgrant is lacking evidence.

Selection Criteria - State Plan

1. The State entity's plan to--

Reader's Score: 30

Sub

1. Adequately monitor the eligible applicants receiving subgrants under the State entity's program;

Strengths:

The applicant appropriately expects that the subgrantees will implement defined activities with fidelity (p. e62). It intends to provide technical assistance to the subgrantees prior to the funding, and establish mechanisms to monitor progress using examples such as the bidders' conference, reviews of initial applications, and providing exemplars so subgrantees may benefit from successful past practices (p. e63). An example of this proactive outreach by the applicant is the use of staffing plans, provided by the SEA to the subgrantee, will inform the subgrantee's progress to the SEA.

The use of on-site visits and on-site technical assistance is a strong method of adequately monitoring the progress and adherence to the objectives (p. e65). This represents an effective methodology of comparisons of the espoused theories to theories in use at the sites by the SEA.

Additional risk assessment measures are reasonably defined and planned by the applicant (p. e65). This, then, reduces the likelihood of nonadherence to the stated objectives. For example, examining the drawdown of performance compared to past experiences provides insight for the applicant to monitor performance.

Weaknesses:

The applicant does not clearly and specifically establish the process for monitoring timelines for the stated objectives (p. e65).

Reader's Score: 8

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

Strengths:

The applicant designed a thoughtful process to avoid/limit the redundancy in administrative issues. For example, if the school's progress is fully evaluated by an authorizer's annual report, the applicant will utilize that report opposed to requiring a duplicate report (p. e65).

Further, the applicant provides cogent and thoughtful information in the application that will meet the Secretary's criterion to reduce redundancies and duplication by including portions of the charter's application to answer/address questions in the application. In addition, the SEA will check with other authorizers for redundancies such as publications of opportunities for schools to learn about federal grants (p. e67). The use of collaboratively defined and collected performance data will be utilized (p. e66).

No weaknesses noted.

Reader's Score:

3. Provide technical assistance and support for--

5

i. The eligible applicants receiving subgrants under the State entity's program; and

ii. Quality authorizing efforts in the State;

Strengths:

The applicant's use of Moodle, webinars, and onsite technical assistance provides convincing evidence that meets the aforementioned criterion. The use of on-site visits and on-site technical assistance, for example, are strong methods of specific monitoring the progress and adherence to the objectives (p. e65). This represents an effective methodology of comparisons of the espoused theories to theories in use at the sites by the SEA.

The applicant provides focused support and technical assistance by contracting with a charter school support organization to provides fellowship support for new site leaders or those who would benefit from additional training and support (p. e68). Funds will be available from the applicant for consultants to support charter school organizations with individual needs. Board training, for example, was specifically noted by the applicant (p. e68).

Weaknesses:

The applicant does not adequately specify, in the most part, clear recruiting efforts and plans outside of the greater Indianapolis area. This potentially is an inequity relative to access in more ruralized locations in the State.

Reader's Score: 8

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

Strengths:

The applicant demonstrates its commitment to this criterion with a strong statement of the importance of parental relationships and stakeholder support for the charter school organization (p. e68). The applicant specifies that data collection from families and community members will be a component of the evaluation. In fact, public hearings are legislatively promulgated for all charter school organizations (p. e69).

Weaknesses:

The applicant stresses the importance of parental involvement in the effective operation of charter schools. However, the applicant's plan to collect data of the involvement of parent and evaluate its efficacy lacks specifics (p. e69).

Reader's Score: 4

5. The degree of flexibility afforded by the State's charter school law and how the State entity will work to maximize the flexibility provided to charter schools under such law.

Strengths:

The applicant clearly states and provides comprehensive evidence that establishes that flexibility is a strength in its practice. The review of the statutes provided by the applicant support this statement (p. e70). For example, charter schools are specifically identified as fiscally and legally autonomous schools with independent school boards (p.

e70). An innovative practice that is legislatively approved is the use of virtual charter schools. An example of flexibility by the State is around teacher evaluations (p. e70). These are preserved flexibilities in the State law for charter school organizations.

Weaknesses:

No weaknesses noted.

Reader's Score: 5

Selection Criteria - Quality of the Management Plan

1. The Secretary considers the quality of the management plan for the proposed project. In determining the quality of the management plan for the proposed project, the Secretary considers:

Reader's Score: 12

Sub

1. The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks

Strengths:

review of the applicant's logic model, deliverables, goals, timelines, and milestones for accomplishing the stated goals was completed and found to be adequate. The applicant intends on leveraging all resources (federal and state) to achieve high-quality and highly effective charter schools which in turn meet the academic needs of their students (p. e71). One of the areas that the applicant intends to achieve is in capacity utilizing a technical assistance model. The professional development to be provided along with the sharing of best practices from both charter and traditional schools is an innovative approach (p. e72).

In the evaluative area, the applicant presents an objective to evaluate the impact of charter schools on student outcomes. The outcome is to reduce the achievement gap by 5% in mathematics and language arts (p. e72).

Weaknesses:

While the applicant does indicate the staff and organizations responsible of the work, it is limited in specificity. For example, IDOE staff are listed as a group opposed to a single lead for the objective.

Reader's Score: 9

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

Strengths:

At various points in the narrative the applicant refers to gathering feedback from stakeholders and subgrantees. The applicant's plan for feedback is adequately developed, and it intends to solicit feedback from stakeholders after the cohorts are funded (p. e72).

The applicant makes a general statement of the importance of feedback but provides limited information about the methods it intends to utilize (p. e72). Other than discussions around continuous improvement models and processes by Purdue University, there was little evidence of its continuous improvement process in this criterion (p. e197).

Reader's Score:

1

3. The extent to which the time commitments of the project director and principal investigator and other key project personnel are appropriate and adequate to meet the objectives of the proposed project.

Strengths:

The FTE allocations specified by the applicant for the project director and assistant project director are adequate for the responsibilities. In addition, the inclusion of specialists to support the work at 1.0 FTE demonstrates a commitment by the applicant to provide supervision of important components of the project. For example, the specialists will oversee the grant and provide technical assistance (p. e73). Resumes and CVs provided by the applicant demonstrate adequacy in education and experience to reasonably manage and/or direct the work scope.

Weaknesses:

No weaknesses noted.

Reader's Score: 2

Priority Questions

Competitive Preference Priority 1 - Competitive Preference Priority 1

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

a. Allows at least one entity that is not a local educational agency (LEA) to be an authorized public chartering agency for

developers seeking to open a charter school in the State ; or

b. In the case of a State in which LEAs are the only authorized public chartering agencies, the State has an appeals process for

the denial of an application for a charter school.

Note: In order to meet this priority under paragraph (b) above, the entity hearing the appeal must have the authority to

approve the charter application over the objections of the LEA.

Please specify whether they meet (a) or (b) and clearly explain why in the strengths.

(0 or 1 points)

Strengths:

The applicant identifies the specific State statute that allows entities to apply for chartering authority; in addition, the applicant provides examples of those entities that meets the criterion from the Secretary (p. e22). In fact, the applicant stipulates eight active authorizers, which satisfactorily meets the criterion in the Competitive Preference Priority 1a (p. e23).

Sub

No weaknesses noted.

1

Reader's Score:

Competitive Preference Priority 2 - Competitive Preference Priority 2

1. To be eligible to receive points under this priority, a State entity must demonstrate that it is located in a state that ensures equitable financing, as compared to traditional public schools, for charter schools and students in a prompt manner.

(up to 2 points)

Strengths:

The applicant identifies two funding sources that substantiates equitable financing as defined by the Secretary in Competitive Preference Priority 2 (CPP2). The two primary sources are State tuition support and local funding (p. e23). The applicant specifically states that the State tuition funds are allocated to each school system including charter schools (p. e23). The CPP2 criteria is equitable as the State funding for charter schools is accessible within the same time frames as traditional public school funding sources (p. e24). The applicant does identify one area of funding for charter schools that is different than public school entities; this is limited to adult high schools and the funding has a separate time line (i. e., biennial appropriation) (p. e25).

The applicant identifies a historical disparity in the local funding as the charter school organization(s) do not have a defined taxing base (p. e25). However, the legislature (2023) enacted legislation that requires property tax dollars generated on a local basis to be shared with charter schools (p. e25). Further, the applicant notes that in 2016 there were two laws established for equal funding for charter schools and public schools for State and Federal funds (p. e26). The 2023 legislative session addressed potential funding inequities and disparities between public school organizations and charter school organizations (p. e27).

Weaknesses:

No weaknesses noted.

2

Reader's Score:

Competitive Preference Priority 3 - Competitive Preference Priority 3

1. To be eligible to receive points under this priority, a State entity must demonstrate that it is located in a state that uses best practices from charter schools to help improve struggling schools and LEAs.

(up to 2 points)

Strengths:

The applicant addresses the criteria in Competitive Preference Priority 3 (CPP3) noting that the legislative branch recognizes and grants flexibility, innovation, and efficiency to achieve an optimal learning environment (p. e27). For example, charter school organizations can establish innovation networks thus establishing different rules and management including significant choice in curricular decisions to meet the needs of the students the entity serves (p. e28). This flexibility includes burdensome implications from collective bargaining agreements that may interfere with innovative practices. An example of this partnership is the Purdue University and PPHS Englewood STEM; this partnership features access to rigorous curriculum for historically underserved students (p. e28).

No weaknesses noted.

Reader's Score:

Competitive Preference Priority 4 - Competitive Preference Priority 4

- 1. To be eligible to receive points under this priority, a State entity must demonstrate that it is located in a State that provides charter schools one or more of the following:
 - a) Funding for facilities
 - b) Assistance with facilities acquisition
 - c) Access to public facilities

2

- d) The ability to share in bonds or mill levies
- e) The right of first refusal to purchase public school buildings
- f) Low- or no-cost leasing privileges

(up to 2 points)

Strengths:

The applicant presents adequate evidence that it meets and exceeds the criterion's Competitive Preference Priorities (CPP4). For example, the State has a team that works with charter school leaders to develop and implement effective financial and facilities strategies (p. e30). The applicant provides a letter of support in its appendix. In addition, the applicant provides specific narrative around the use of public facilities (c), the authorization for charter school organizations to access the Indiana Bond Bank (d), and specific authorization to purchase public school buildings (p. e30).

Weaknesses:

No weaknesses noted.

2

Reader's Score:

Competitive Preference Priority 5 - Competitive Preference Priority 5

1. To be eligible to receive points under this priority, a State entity must demonstrate that it supports charter schools that serve at-risk students through activities such as dropout prevention, dropout recovery, or comprehensive career counseling services.

(up to 3 points)

Strengths:

The applicant provides a cogent and compelling argument that it meets the Competitive Preference Priority (CPP5) with specific examples of service to at-risk populations. For example, the State has developed models for dropout recovery schools (p. e31). Gary Middle College serves the northwestern portion of the State; this area is impoverished and access to a high school diploma is an accessible benefit to its citizens.

The commitment by the State to serve a unique population outside the traditional accountability model led the legislature to develop an alternative to their systems. This includes career readiness implications (p. e32). Demonstrating its commitment to serve charter schools' at-risk populations is adequately addressed by the applicant. For example, the applicant notes that there are charter schools operating that serve exclusively at-risk students (e.g., Damar Charter Academy serves ~98% students with identified disabilities) including students experiencing issues of addiction (p. e32).

No weaknesses noted.

Reader's Score:

Status:SubmittedLast Updated:07/02/2023 12:42 AM

3

Status: Submitted Last Updated: 07/06/2023 08:31 AM

Technical Review Coversheet

Applicant:Indiana Department of Education (S282A230012)Reader #3:**********

		Points Possible	Points Scored
Questions			
Selection Criteria			
Quality of Project Design			
1. Quality of Project Design		35	33
Quality of Eligible Applicants Receiving Subgrants 1. Eligible Applicants		15	13
State Plan			
1. State Plan		35	27
Quality of the Management Plan			
1. Management Plan		15	12
	Sub Total	100	85
Priority Questions			
Competitive Preference Priority 1			
Competitive Preference Priority 1			
1. CPP1		1	1
	Sub Total	1	1
Competitive Preference Priority 2			
Competitive Preference Priority 2			
1. CPP2		2	2
	Sub Total	2	2
Competitive Preference Priority 3			
Competitive Preference Priority 3			
1. CPP3		2	2
	Sub Total	2	2
Competitive Preference Priority 4			
Competitive Preference Priority 4			
1. CPP4		2	2
	Sub Total	2	2
Competitive Preference Priority 5			
Competitive Preference Priority 5			
1. CPP5		3	3
	Sub Total	3	3

Total

110

95

Technical Review Form

Panel #7 - State Entities - 10: 84.282A

Reader #3:*********Applicant:Indiana Department of Education (S282A230012)

Questions

Selection Criteria - Quality of Project Design

1. 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:

Reader's Score: 33

Sub

1. The extent to which the proposed project demonstrates a rationale;

Strengths:

The applicant provided details of its new Quality Counts 2 program with a rationale based on state trends and data (page e38). They clearly defined the number of schools receiving comprehensive support statewide and provided sound data showing the high number of charters they have located in areas with significant numbers of schools receiving comprehensive support (page e37). The applicant adequately addressed the number of charter schools they plan to open each year of the grant (10 per year, 50 total) {page e37}.

The applicant sufficiently describes steps for sharing best practices based on work already begun under the old grant round (page e39).

Weaknesses:

The applicant presents a significant amount of district data but failed to demonstrate strong research on the strategies they plan to implement (pages e37-e49).

Reader's Score:

3

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 project and will produce quantitative and qualitative data to the extent possible; and

Strengths:

The applicant provides performance measures based on nationally accepted practices. The applicant details the short-, mid-, and long-term targets for performance indicators listed under each priority. The performance measures are sound and associated with data collection and reporting methods. Each performance indicator is directly related to outcomes indicative of a successful grant program implementation.

Weaknesses:

No weaknesses found.

Reader's Score: 5

3. The ambitiousness of the State entity's objectives for the quality charter school program carried out under the CSP State Entity program

Strengths:

The applicant presented data from a poll given to current authorizers, and the outcomes showed that they expected to open approximately 50 schools over the next five years. As such, the goal of opening 50 schools is justified. Based on the data provided on page e48, the charter authorizer has yet to have a five-year period where they have opened 50 schools. As such, the applicant demonstrates that the goal is ambitious yet attainable.

Weaknesses:

No weaknesses found.

5

Reader's Score:

4. The extent to which the projected number of subgrant awards for each grant project year is supported by evidence of demand and need, and the extent to which the proposed average subgrant award amount is supported by evidence of the need of applicants

Strengths:

The applicant provided a complete data set explaining the need for additional charters in the state, projections, and a rationale for the amounts requested along with examples of charter schools in target areas (page e48). The applicant also provided a sound rationale based on data from the first operating year of a variety of charters (page e48). The accompanying budget narrative offers additional details regarding the breakdown and allocation of grant funds. As such, the application provided a thorough justification for the maximum subgrant award amount.

Weaknesses:

No weaknesses found.

Reader's Score: 20

Selection Criteria - Quality of Eligible Applicants Receiving Subgrants

1. The likelihood that the eligible applicants receiving subgrants under the program will meet the State entity's objectives for the quality charter school program and improve education results for students.

Strengths:

The applicant presents a well-developed plan to award subgrants based on the following:

The applicant proposes a reasonable method for communicating the availability of subgrants. The applicant outlines a comprehensive newsletter and Moodle course on CSP details (page e49).

The applicant details the existing unique models and plans to expand or replicate them over the next few years (pages e50-e51). The applicant also provided sufficient details of subgrantee eligibility criteria and supporting documentation outlining the application process (RFP). The applicant provided detail on the application process, including peer review information and a detailed timeline (pages e54-e55). The need for a community-centered approach is addressed in the applicant's description of the subgrantee's application (page e60).

Weaknesses:

The applicant noted that the IDOE communicates with authorizers and state charter support organizations quarterly (page e50) but failed to mention the method of communication, thus giving an incomplete explanation of how authorizers and

support organizations directly receive formal CSP grant information.

Reader's Score: 13

Selection Criteria - State Plan

1. The State entity's plan to--

Reader's Score: 27

Sub

1. Adequately monitor the eligible applicants receiving subgrants under the State entity's program;

Strengths:

The application identified specific strategies to ensure the monitoring of grantees begins before they apply (page e63). The application effectively explained the monitoring of grantees via a customized scope based on the risk assessment, on-site technical assistance, and monitoring (page e65).

Weaknesses:

No monitoring timeline was included in the narrative.

7

The application mentions a comprehensive protocol for monitoring but does not provide details (page e63). There is no detailed description of how the applicant will ensure the subgrantees use the funding for the needs of students with disabilities and English language learners other than a general reference to the state legislature that requires all schools to serve students with disabilities (page e67).

The applicant did not address the transparency of monitoring findings.

Reader's Score:

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

Strengths:

The applicant clearly identifies strategies to eliminate duplicative work by bypassing school reports when one is available from the authorizer, annual check-ins with authorizers for updates to metrics, and seeking data-sharing opportunities with authorizers (page e68).

Weaknesses:

No weaknesses found.

Reader's Score:

3. Provide technical assistance and support for--

5

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

Strengths:

The application presented sufficient information on pre-submission technical assistance and risk assessments when grantees are awarded (page e65).

The application adequately presents activities that are likely to increase authorizer capacity. The application documented a partnership with an external organization for the purposes of training authorizing staff as well as providing funds for consultants to work with authorizers and increase quality authorization (page e68).

Weaknesses:

The applicant's plan for technical assistance failed to adequately detail activities that help subgrantees address the overuse of discipline practices that remove students from the classroom (Page e63).

Reader's Score: 8

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

Strengths:

The application outlines the entity's plans to engage authentically with parents and community members, to assist with decision-making. The application presents sufficient strategies for an emerging relationship with families and community members including the collection of survey data (page e69).

The application also sufficiently detailed using public comments from hearings as a part of the subgrantee's file (page e69).

Weaknesses:

While some strategies for parent engagement were included (page e69), there were substantial missing points such as a timeline of activities. The application mentions obtaining parent survey data from authorizers but does not completely detail how that data will be used (page e69).

The method of obtaining review comments from families was missing from the application narrative.

Reader's Score:

3

5. The degree of flexibility afforded by the State's charter school law and how the State entity will work to maximize the flexibility provided to charter schools under such law.

Strengths:

The applicant provides a sufficient list of the flexibility afforded to charter schools in Indiana (page e70), including the presence of multiple authorizers, legal autonomy and boards, access to state retirement systems, and legal flexibility related to autonomous schools.

The applicant discusses the plan to continue advocating for some of these flexibilities (page e70).

Weaknesses:

The application did not completely address the plan to maximize all the noted flexibilities (page e70).

Reader's Score: 4

Sub

Selection Criteria - Quality of the Management Plan

1. The Secretary considers the quality of the management plan for the proposed project. In determining the quality of the management plan for the proposed project, the Secretary considers:

Reader's Score: 12

Sub

1. The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks

Strengths:

The applicant presents a timeline of activities and milestones on page e71 of the application. The timeline includes inputs & resources, outputs, short-, mid- and long-term goals.

Weaknesses:

While most of the plan has time-specific items listed, some aspects are anticipated dates. For example, the short-, mid- and long-term goals listed in the table under Objective 3 (page e72) have no time attached to them. This is ambiguous as it doesn't provide insight as to whether the goal is annual or over the life of the subgrant. As such, the timeline lacks some key timeline details.

The logic model presented is missing key activities described throughout the application such as the collection of parent survey data to inform school improvement (page e72).

Reader's Score: 8

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

Strengths:

The applicant explains a plan to use feedback from a variety of stakeholders including subgrantees after the cohort ends as well as authorizers (page e72).

Weaknesses:

The applicant discusses the collection of feedback but does not give details about the collection procedural methods (survey, email, or interview). As such, the procedural aspects of the feedback activities lack sufficient detail (page e72).

Reader's Score: 2

3. The extent to which the time commitments of the project director and principal investigator and other key project personnel are appropriate and adequate to meet the objectives of the proposed project.

Strengths:

The application provides a breakdown of time commitments (by percentage) for one employee (page e73) and provides FTE allocations for the remaining employees. The application also presents details on key personnel's duties and adequately addresses time commitments necessary to meet the goals and objectives of the project (e72-82).

Weaknesses:

No weaknesses found.

Reader's Score: 2

Priority Questions

Competitive Preference Priority 1 - Competitive Preference Priority 1

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

a. Allows at least one entity that is not a local educational agency (LEA) to be an authorized public chartering agency for

developers seeking to open a charter school in the State ; or

b. In the case of a State in which LEAs are the only authorized public chartering agencies, the State has an appeals process for

the denial of an application for a charter school.

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

Please specify whether they meet (a) or (b) and clearly explain why in the strengths.

(0 or 1 points)

Strengths:

The application completely addresses priority one (pages e22-23) and indicates that the Indiana Board of Education has at least one entity that is not an LEA (Indiana has 5 authorizers that are not LEAs – 8 total).

Weaknesses:

No weaknesses found.

Reader's Score: 1

Competitive Preference Priority 2 - Competitive Preference Priority 2

1. To be eligible to receive points under this priority, a State entity must demonstrate that it is located in a state that ensures equitable financing, as compared to traditional public schools, for charter schools and students in a prompt manner.

(up to 2 points)

Strengths:

The application details Indiana's use of a foundational funding method that provides all students in public schools (charters included) with a base per-pupil allocation. Additional funding can be obtained through grants offered at the state level for various unique needs. The application outlines the different types of grants focusing on the complexity grant, prioritizing schools with low-income students (pages e23-29). The applicant noted inequitable funding programs with local sources such as levies and also provided evidence of how the state counteracts the gap by delivering charter-only grants such as the Charter and Innovation School Grant Program. The evidence of the foundation funding formula and the Complexity grant's purpose of making funding for at-risk populations more equitable provides sufficient evidence that the

entity demonstrates fair financing for charter schools (page e26).

Weaknesses:

No weaknesses found.

Reader's Score: 2

Competitive Preference Priority 3 - Competitive Preference Priority 3

1. To be eligible to receive points under this priority, a State entity must demonstrate that it is located in a state that uses best practices from charter schools to help improve struggling schools and LEAs.

(up to 2 points)

Strengths:

The application addresses the Indiana legislature's implementation of the Innovation Network Schools, which provide for more high-quality schools in all neighborhoods, emphasizing improving struggling schools in Indiana. The applicant notes that charter-like autonomy is afforded to schools identified in this network, which gives them the decision-making power to reach their students in unique ways. As such, the applications provide essential details surrounding the implementation of this school designation and its impact on struggling schools and districts (pages e27-29).

Weaknesses:

No weaknesses found.

Reader's Score:

Competitive Preference Priority 4 - Competitive Preference Priority 4

- 1. To be eligible to receive points under this priority, a State entity must demonstrate that it is located in a State that provides charter schools one or more of the following:
 - a) Funding for facilities
 - b) Assistance with facilities acquisition
 - c) Access to public facilities

2

- d) The ability to share in bonds or mill levies
- e) The right of first refusal to purchase public school buildings
- f) Low- or no-cost leasing privileges

(up to 2 points)

Strengths:

The applicant clearly notes the type and amount of funding offered for facilities. The applicant noted a partnership with CIES and Level Field Partners to assist charter school operators with facilities acquisition support (page e29). The application notes that Indiana legislature provides for access to unused facilities, details legislature related to using bank bonds as first rights to purchase (page e30).

Weaknesses:

No weaknesses found.

Competitive Preference Priority 5 - Competitive Preference Priority 5

1. To be eligible to receive points under this priority, a State entity must demonstrate that it supports charter schools that serve at-risk students through activities such as dropout prevention, dropout recovery, or comprehensive career counseling services.

(up to 3 points)

Strengths:

The applicant provides sufficient examples of unique school models, including alternative schooling, that serve at risk students and students with disabilities. The applicant provided related data via tables to demonstrate the fact that charters serve a disproportionate amount of English Language Learners, Special Education, Minority and At-Risk students (pages e31-33).

Weaknesses:

No weaknesses found.

Reader's Score: 3

Status: Submitted Last Updated: 07/06/2023 08:31 AM