

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

Status: Submitted

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Technical Review Coversheet

Applicant: Indiana Department of Education (U282A170017)

Reader #1: *****

	Points Possible	Points Scored
Questions		
Selection criteria		
Flexibility		
1. Flexibility	10	10
Sub Total	10	10
Selection Criteria		
Objectives		
1. Objectives	15	12
Quality of Eligible Subgrant Applicants		
1. Quality of Subgrant	15	10
State Plan		
1. State Plan	20	17
Parent and Community Involvement		
1. Involvement	10	8
Quality of Project Design		
1. Project Design	15	12
Quality of the Management Plan, Theory of Action		
1. Management Plan	15	10
Sub Total	90	69
Priority Questions		
Competitive Preference Priority 1		
Periodic Review and Evaluation		
1. Review and Evaluation	5	5
Sub Total	5	5
Competitive Preference Priority 2		
Charter School Oversight		
1. Charter School Oversight	5	5
Sub Total	5	5
Competitive Preference Priority 3		
Authorizer other than LEA or Appeal Process		
1. Authorizer other than LEA	2	2
Sub Total	2	2

Competitive Preference Priority 4

Equitable Financing

1. Equitable Financing	2	1
Sub Total	2	1

Competitive Preference Priority 5

Charter School Facilities

1. Charter School Facilities	2	2
Sub Total	2	2

Competitive Preference Priority 6

Best Practices to Improve Struggling Schools/LEAs

1. Struggling Schools	2	1
Sub Total	2	1

Competitive Preference Priority 7

Serving At-Risk Students

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

Competitive Preference Priority 8

Best Practices for Charter School Authorizing

1. Best Practices	5	2
Sub Total	5	2

Total	125	98
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Technical Review Form

Panel #17 - Panel 17 - Indiana - 1: 84.282A

Reader #1: *****

Applicant: Indiana Department of Education (U282A170017)

Questions

Selection criteria - Flexibility

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

Strengths:

Indiana has a strong charter school law, with the Center for Ed Reform giving the state an A in its nationwide rankings, and the National Alliance ranked the law as the top in the country for the second year in a row (pg. 43).

Indiana law allows for charter school exemption from any state statute, rule or guideline adopted by the state board of education applicable to a governing body or school corporation (pg. e43). This law incorporates explicit flexibility around several guidelines, including financial oversight, purchased services, employee processes, and third party contracting.

The law also explicitly considers and provides for specific allowances when a traditional school undertakes conversion to a charter school (pg. e43).

Flexibilities are provided for teacher certification and licensing requirements, including delays in requirements for teachers in transition programs, and ability to teach full time if the individual holds a degree from an accredited institution and met a particular grade point average threshold.

The Indiana Department of Education defers to the authorizer and the charter contract in situations where this relationship and document can provide for compliance with state requirements. This positively reinforces the authority and role of the authorizer and upholds the autonomy of the school (pg. e44).

Weaknesses:

No weaknesses noted.

Reader's Score: 10

Selection Criteria - Objectives

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

Strengths:

The objectives are clear and specific, including specific quantification where applicable (pg. e45). The applicant is seeking to award 60 subgrants in a 5-year period to charters seeking incubation, expansion and replication.

The Department also recognizes the limitations to its own regulatory, oversight role and has built into its plan an objective around establishing and facilitating partnerships with local organizations that can provide direct assistance for incubation and support to charter school capacity-building and implementation efforts (pg. e45).

Objective 3 seeks to undergo a comprehensive analysis utilizing longitudinal data to determine the effectiveness of charter schools on student achievement, families and communities, and share best practices between charter schools and traditional public schools, ambitiously promulgating work to date in identifying sources for dissemination (pg. e45).

Respecting the boundaries inherent within its role, the Department seeks to identify and acquire relevant supports for authorizers, rather than provide direct services in this area (pg. e46). The Department will contain its direct efforts to undertaking a thorough needs assessment. This recognition and indirect approach to bring value-add to these sector stakeholders should be applauded.

Weaknesses:

Objective 3 lacks clarity, as the goal is explicitly stated to evaluate the effectiveness of charter schools on statewide educational efforts (pg. e45). However, the narrative goes on to reference the innovation practices occurring statewide, making it unclear whether the overarching intent is to measure the impact of the sector, or to specifically isolate particular best practices within the sector for dissemination or replication.

Objective four lacks operationalization of the term growth utilized in the objective language (pg. e46). It is unclear whether this corresponds to sector growth in school count, student performance growth as measured by assessments, or whether this refers to professional growth along the nationally recognized essential practices of authorizing. If it is related to quantity or quality measurements, then the strategy underlying this objectives that focuses on standards of quality in authorizing does not directly correspond to expansion, replication or incubation efforts that might translate specifically to sector growth. Similarly, if the intention is the latter, and growth implies maturation or increased capacity of authorizers, then the inherent breadth and generality applied to this objective cannot be evaluated for specific rigor and feasibility without additional detail.

The stated objectives (pg. e44-45) are not explicitly tied to measures of performance or expectations of increases in school quality. Rather, they are focused primarily on growth and increases in charter count. One could argue that replication and expansion efforts will correspond to increasing quality if quality thresholds are established, but this is not explicitly stated in the application, and still has moderating factors such as ensuring preservation of quality in the flagship program.

Reader's Score: 12

Selection Criteria - Quality of Eligible Subgrant Applicants

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

Strengths:

The sector has experienced consistent growth since the passage of the charter school law in 2001, with approximately 8 new charter schools opening per year (pg. e46). During this time, the state has also seen 26 charter school closures, indicating the sector is strong in fulfilling its accountability role and conscientious of its obligations to the community in the areas of fiscal stewardship.

More specifically, the state has witnessed charter schools beginning to open beyond the perimeters of the largest cities (pg. e47). Prior to recent years, a majority of charter schools were contained to Indianapolis and Gary. Currently, there are schools in 21 of 92 counties, including specifically rural areas. The breadth of this growth supports the idea that the state can meet its growth objectives, as saturation in the two key areas is not likely to be an issue.

Indiana has aligned its definition of high quality to the Federal Register (pg .e48), which ensures that eligibility is aligned to the intent of the grant, as well as the objectives outlined in the application. This definition aligns to the State's categorization of an A and B in the State's A-F system.

The Department is also committed to working with authorizers to identify potential subgrantees (pg. e49). This will ensure quality is validated by an external source, and also ensures consistency between authorizer and Department perspectives of school performance.

Weaknesses:

The quality of the eligible pool is explained in detail primarily through case studies of a few charter schools (pg. e48). While the handful of charter schools highlighted boast impressive statistics and successes, and directly reflect some benefits from previous state grants, it is unclear whether the sector has enough quality schools to deliver on the 5-year objective of 60 additional programs from this information alone.

The table used in the application (pg. e50) to present the distribution of charter performance over time is qualified with explanations of changes to state standards and assessment, making it difficult to ascertain true performance over time that would allow for determining whether the eligible pool is growing or narrowing over time. Additionally, the table does not provide sample sizes, only the percentages of schools in each rating. This further makes it unclear whether the proportion of eligible schools would satisfy near or long-term objectives for expansion and replication.

Although declines in charter schools categorized as A or B and increases in charter schools categorized as D or F are attributed to changes in assessment and standards statewide, these changes are greater when compared against traditional public schools (pg. e51). For example, the proportion of A/B charter schools fell from 46.1% to 24.3%, which is a decline of 21.8%. The decline of all public schools was only 16% according to the application (pg. e51). Similarly, charter schools saw a greater increase in F ratings (6.2%) alone than the statewide increase of D/F schools combined (4%). It is unclear from the application why this overall decline was more prevalent in charter schools than traditional public schools. It is also unclear how this trajectory or change in overall distribution impacts the eligible pool of subgrantees from prior years, and further makes it difficult to determine whether the charter sector is producing meaningful results in a way that would warrant and encourage expansion of 60 additional programs.

More absolute figures of comparison between the performance of charter schools and traditional public schools were provided in a table reporting median levels of growth between the two groups (pg. e52). However, only figures for Indianapolis and Gary were provided, making it unclear how representative these figures are statewide. Although the application goes on to openly acknowledge that outperforming averages in these cities does not necessarily constitute high quality options (pg. e53), the proportion or count of schools performing well (or earning an A and B) within these areas was not included. This again makes it unclear whether devotion to increased support in these two areas specifically will correspond to meeting many of the objectives in the application.

Reader's Score: 10

Selection Criteria - State Plan

1. The State entity's plan to--

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

Strengths:

The plan innovatively considers a differentiated approach to monitoring and support of its sub-grants (pg. e55). This not only preserves resources, but reduces burdens and requirements for more successful and efficient subgrantees.

Roles, responsibilities and job descriptions affiliated with the monitoring plan were effectively outlined in the application (pg. e55). The Charter School Specialist role will not only oversee the grant processes and administration of funds, but also serve to coordinate and facilitate the relationships and activities with desired external partners. This awareness of the time and resources necessary to secure these external opportunities has been well considered and accounted for in the state plan for staffing.

The staffing model to implement the IDOE plan for monitoring has also accounted for percentages of support from other crucial personnel at the Department, including Title programming and financial controls (pg. e56).

The IDOE plans to work with authorizers in evaluating progress of grant objectives and general performance review (pg. e58). This will ensure a shared understanding and perspective on charter school performance, and avoid the conflict that can arise when the two entities possess or report opposing views of charter school performance.

Following the screening and selection process, the Department engages in an overall risk assessment (pg. e56-57). This model allows the Department to build a customized plan for oversight and monitoring of individual applicants based on need and identified risk. Criteria utilized in the assessment include experience of the charter project director, authorizer findings, performance, and even amount of the award granted.

All applicants will receive both virtual assistance and on-site assistance within the first 12 months of school operations to verify approved activities are occurring (pg. e59).

Progress reporting is required from the subgrantee each fiscal year to ensure the objectives of the grant are being met. It also allows for clarity around variation or changes to existing plans for the upcoming year with regard to grant planning (pg. e57).

The state has accounted for collection of data to determine eligibility for both existing schools, as well as developing a process for new schools that have not yet been operating long enough to generate outcomes that would warrant a high quality designation (pg. e58).

In addition to the grant cycle, the state plan also incorporates a subsequent 'sustainability' year (pg. e60) that focuses on the charter's ability to maintain its activities and successes once the grant has expired. Technical assistance and support with partner agencies exist in this area as well. This will ensure ongoing stability and success with subgrantees.

Weaknesses:

Because the Department will rely upon authorizer frameworks and reporting to identify eligible applicants, it is unclear whether this will unfairly penalize any charter schools that operate under an authorizer that does not have strong frameworks or reporting practices.

It is unclear whether the risk model assessment utilized at the onset of implementation for each subgrantee is revisited or revised throughout the grant cycle as performance of the applicant changes across performance indicators or constructs (pg. e57).

Although the application seeks to avoid duplication of efforts in activities such as the required annual progress reporting of performance information by the sub-grant applicant (pg. e58), it is unclear whether it will be the responsibility of the charter school, the authorizer, or the Department to review criteria collected and required to determine if additional

reporting is necessary. It also wasn't referenced whether some information is not necessary to collect from the school or authorizer at all if other units within the Department already have it (such as assessment or accountability information).

The application states that rigorous authorizer processes have yielded an increase in the percentage of charter schools receiving an A or B and a reduction in the percentages of charter schools receiving a D or F (pg. e58). This conflicts with information presented elsewhere in the application that reveals the exact opposite information (pg. e51).

The application cites an existing data sharing agreement with authorizers to support their annual reviews and reporting requirements (pg. e62). This conflicts with prior information in the application that seeks to establish a process or pathway for getting data directly to authorizers (pg. e22).

The application references again the IDOE plan to conduct a needs assessment and then solicit the help of an external agency to provide technical assistance to authorizers. It asserts that this technical assistance will be available to all authorizers, but 'will not require unnecessary or unrequired support' (pg. e62). It is unclear whether this implies that assistance is optional for all authorizers, even those that may be under suspension or consideration for sanctions.

Reader's Score: 17

Selection Criteria - Parent and Community Involvement

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

Strengths:

The application specifically cites plans to monitoring the effectiveness of parent and community involvement strategies identified in the sub-grant initiatives (pg. e63).

During the research and evaluation process, the IDOE will solicit and review comments from families and community members in areas where the applicants open and operate charter schools. In areas where support seems limited or even controversial, the IDOE will reinforce the need for awardees to host additional meetings or implement other direct strategies to improve these practices.

The application outlines the requirements contained within a new school process that specifically seek to assess parent and community involvement and engagement (pg. e63). This body of evidence, which requires in-person and documented evidence, can be collected and utilized by the IDOE.

The Department also has plans to develop a quality survey that can solicit meaningful information from families and community members (pg. e64). Its content will extend beyond simple support for charter schools and attempt to determine the reasons parents choose to/choose not to send their children to charter schools, what can be improved, and how charter schools fit into their specific landscape. These results will be made public in order to facilitate a larger statewide conversation with a variety of stakeholders.

Weaknesses:

With many efforts in this area tied to authorizer work, such as the hearings and application components (pg. e63), this statement, 'most authorizers include a community engagement component as part of their application and application rubric' challenges the comprehensiveness of the Department's plan. If even one authorizer is negligent in this area, it is unclear how the Department will then solicit or utilize this valuable information from charter schools that operate within that particular portfolio.

The application states that 'in instances where substantial concerns are raised, the IDOE will ascertain the need for parent/community focus group meetings or other direct strategies to improve practices' (pg. e63). It is not clear from the language and supplemental narrative whether this will be required of subgrant applicants, and subsequently monitored, or whether this will simply be a suggestion or recommendation to identified schools.

Reader's Score: 8

Selection Criteria - Quality of Project Design

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

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

Strengths:

The project design sufficiently includes a component for advertising the grant opportunities, affiliated timeline, and eligibility to a variety of stakeholders (pg. e64). The timeline provided is reasonable, and incorporates long-term planning and activity by both the Department and the charter school beyond the application process itself.

The application includes a breadth of assurances and content that seeks information beyond grant activities, such as familiarity and ability to comply with legal requirements, demonstration of capacity to implement the identified activities, authorizer input and alignment, community and parent involvement, internal control practices, and measurable near and long-term objectives (pg. e65-66).

Preference points are also awarded to emphasize subgrant priorities within the charter school growth objectives. These include points for programs focused on early childhood education, as well as those located in rural settings (pg. e65).

Although the average number of school openings each year falls below the anticipated estimate of 12 schools per year, the application provides for rationale to support the increase (pg. e68). This rationale includes the presence of the grant opportunity, changes to the funding formula that makes it more attractive to charter outside of urban regions, and higher foundation funding and involvement from external partners.

Success of the prior SEA grant is also cited as rationale to ensure success in meeting grant objectives (pg. e69); 124 subgrants were awarded through the 2010-2015 grant cycle, providing over \$30 million dollars in support to charter schools.

Weaknesses:

While the peer review process lists broad educational expertise from which it plans to draw (including district leaders, charter funders, management organization leaders, experts in special education, English Language Acquisition, early childhood, rural expertise, and policy professional), it is unclear how the Department will ensure expertise is secured in

crucial areas that typically fall outside of the K-12 landscape, such as finance, legal, and data analytics (pg. e65). It is further unclear how a robust and diverse review will occur when it is anticipated that only 2 reviewers are utilized for each application.

If the Department conducts a 'final review' (pg. e67) of all applications, it is unclear whether or how this overlaps or is distinct from the peer review process. The weight and possible impact of the two-tiered approach was not differentiated in detail.

Although the assumptions build upon existing data related to charter school openings over time, the number reported (an average of 9 schools opening each year) conflicts with an earlier section of the application that cites an average of 8 schools per year, and lists only one year where the number was 9 (pg. e46). While this is only a discrepancy of 1 school per year, it is unclear what this difference implies when the objective is actually higher than both numbers, being set at 12 schools awarded per year.

Although subgrant history and success is described in the application (pg. e69), a direct connection of how historical applicants relate to the potential applicant pool of this grant was not described as required in the evaluation criteria. Further, reporting an award count, but excluding proportion, makes it difficult to determine whether all applicants were awarded in historical years, or whether a competitive process existed.

Reader's Score: 12

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

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

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

Strengths:

The overarching goal of the grant aligns to the purpose and criteria of the federal program initiative. The logic model provided addresses the state-level strategy to implement its plan with a likelihood of success, aligning resources to activities, outputs and goals (pg. e69).

Activities clearly stated in the logic model are supplemented by corresponding timelines and distribution of funds (pg. e68).

The goals of Objective 4 correspond directly to the efforts to work with authorizers short and long-term to identify needs, respond to these needs through identifying relevant experts, and incorporate the long-term objective of improving the proportion of high performing schools in each portfolio (pg. e71).

The outputs and deliverables for Objective 3 will have impact beyond the goals and outcomes stated in the application, including transparency in information, information to drive statewide strategy and policy conversations, the identification of best practices from which to draw upon at local and national levels, as well as the building of key networks and

stakeholders that can create symbiotic relationships moving forward (pg. e72).

Weaknesses:

The outcomes of Objective 1 are not explicitly measurable (pg. e72-73). The arbitrary term 'increase high quality seats' is utilized at the target, which does not capture magnitude or ensure alignment to intended objectives of the proposal.

The goals of Objective 2 do not directly correspond to the inputs described (pg. e74). For example, if the strategies are to build capacity, share best practices, provide professional development for charter schools navigating growth, the direct outcomes may not correspond to increases in charter schools. It could still be viewed as a success if schools decide they are not ready to expand or replicate as a result of the training, or if they successfully share or receive best practices but do not expand or replicate, or even further, if they improve in performance but do not expand or replicate. However, the goals only yield success in absolute growth terms.

The short-term goals of Objective 3 to increase state proficiency in ELA and Math by 5% does not directly correspond to the objective around evaluating the impact of charter schools on student outcomes (pg. e74). The objective specifies initiatives to analyze data, identify need and develop training. With so many confounding variables (time, resources, school-level implementation efforts, instructional quality, etc.), it cannot be determined that these activities alone connect directly to increased performance.

The baseline data provided for objective 1 (pg. e76) only reports the number of charter schools operating in Indiana (n=93), rather than the number of high quality schools operating currently. This does not allow for a determination as to whether the targets set to increase the number of high quality schools are ambitious or feasible against the sector figures or statewide school counts.

The only baseline data provided for Objective 2 was related to the number of Innovation Network Schools (pg. e76). While leveraging this program is a strategy within Objective 2, other information related to the strategies of this goal were not provided, including information from potential partners to date such as formalization of relationships or count of charter schools currently leveraging these resources or relationships.

Specific interventions, sanctions or supports are not addressed by the Department to respond to compliance issues or findings throughout the process. Instead, an assurance that the process and personnel allows for this is cited (pg. e78).

Reader's Score: 10

Priority Questions

Competitive Preference Priority 1 - Periodic Review and Evaluation

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

Strengths:

In addition to a formal review of performance against academic expectations being required once every five years under Indiana Code, annual collection of data and reporting is also called for in other sections of statute (pg. e20). This promotes transparency and mutual understanding of charter status on a more regular basis.

Authorizers must submit an annual report to the IDOE detailing information and performance for each school (pg. e21), as well as decision-making made by the authorizer. This has allowed for longitudinal tracking by the State of both charter and authorizer performance criteria.

A variety of measures are required within the formal authorizer review of charter performance that span academic outcomes along assessment and readiness measures, engagement measures such as attendance, and on-track or status measurements such as credit accrual and IB participation, as well as financial and operational indicators of performance (pg. e22). Required reporting along this breadth of measurement ensures a more comprehensive and broad review.

The State has an automatic closure provision wherein charter schools remaining in the F category on the State's accountability system for four years may not be renewed unless the authorizer petitions the State Board of Education on the school's behalf (pg. e21).

The State is working to streamline data accessibility and sharing practices so that authorizers are able to pull down data directly from the State and reduce reporting and potential for misalignment for both schools, the authorizers, and State (pg. e22).

The SBOE requires formal evaluation of the overall state of the charter sector at least once every five years by the Indiana Department of Education, allowing for the aggregation and analyses of these data points collected over time.

Weaknesses:

No weaknesses noted.

Reader's Score: 5

Competitive Preference Priority 2 - Charter School Oversight

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

a) That each charter school in the State--

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

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

Strengths:

The charter contract is distinct from the charter's application, which not only allows for more emphasis to be placed on the roles, powers, and responsibilities of both the authorizer and the school, but also reduces the often bureaucratic burdens required to frequently amend the contract provisions when the application is treated as the contract (pg. e24).

The Applicant also specifies requirements and assurances for the charter school when negotiating with its proposed operator, which serves to protect the school from potential conflicts of interest or unilateral conditions that would jeopardize the role of the board in overseeing that agreement.

Charter schools are required to participate in and provide documentation of an independent financial audit that ensures

fiscal health and compliance (pg. e24).

Contracts are required to contain methods of evaluation, which must contain required elements of measurement, but often take the form of the authorizer's performance framework (pg. e25). Additional information is included that describes the performance indicators which are required to be the primary drivers of renewal or development decision-making, and include robust performance measures that ensure achievement for all groups of students through components of disaggregated reporting and evaluation.

Weaknesses:

No weaknesses noted.

Reader's Score: 5

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

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

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

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

Strengths:

Indiana statute allows for multiple entities to apply for chartering authority, including higher education institutions, the executive of a consolidated city, an independent charter board, and the governing board of a nonprofit (pg. e28). These have generated eight different authorizers in the state spanning the Mayor's Office, public and private educational institutions, and other authorizers that fit those categories. Of the eight active authorizers in the state, five even have the ability to authorize charter schools statewide.

Although an explicit appeal process is not described, applicants who are rejected are permitted to revise and resubmit their materials to the same authorizer, and are also able to submit a proposal to another authorizer. Limitations are not set on the number of times an applicant may apply to an authorizer (pg. e28).

Weaknesses:

No weaknesses noted.

Reader's Score: 2

Competitive Preference Priority 4 - Equitable Financing

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located ensures equitable financing, as compared to traditional public schools, for charter schools and students in a prompt manner.

Strengths:

The law provides for equitable state and federal funding, as well as access to categorical funding that includes the Honors Grant, Special Education funding, CTE funding, and the Complexity Grant (pg. e29).

In order to work towards mitigating this disparity, the General Assembly directed the Department to seek and apply for funding that could correct for this. In 2009, Indiana received a facilities grant that created the Charter School Facilities Assistance Program, which has yielded over \$12million dollars in loans to support efforts with more than 50 charter school facilities (pg. e31).

Additional grant opportunities have existed for charter schools including the Charter and Innovation School Advance Program and the Charter and Innovation School Grant Program. Under the former, 38 charter schools received almost \$42 million dollars for educational purposes, and under the latter, more than 50 received more than 23 million dollars to be used for capital projects, technology and transportation (pg. e32).

Weaknesses:

The Applicant transparently asserts that charters do not have access to local tax levies for transportation and facilities, and do not have access to local capital funds for insurance costs (pg. e29).

Because charter schools must be open to any student in the state, a charter school does not have a defined taxing district from which to receive property tax dollars. This has resulted in significant disparities in funding in some areas. In many areas, this funding accounts for more than one third of funding to traditional public schools (pg. e32).

Reader's Score: 1

Competitive Preference Priority 5 - Charter School Facilities

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

Strengths:

Indiana provides each school that meets specified criteria a \$500 per pupil grant that can be used to offset facilities costs (pg. e33).

In addition to the requirement to meet one or more of the following sub-criteria, external agencies exist to directly support charter school funding for facilities (pg. e33), including the Illinois Facilities Fund (IFF) and Charter School Development Corporation (CSDC).

Indiana statute allows for charter access to unused public facilities (pg. e34), and the Department fosters this accessibility by maintaining a list of eligible facilities. This provision also requires that the corporation cannot sell or lease the building for more than \$1 as long as the charter school uses the building.

Weaknesses:

No weaknesses noted.

Reader's Score: 2

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

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

Strengths:

The application describes the purpose and practices of Innovation Network Programs as a significant strategy for sharing best practices (pg. e35). This program was specifically designed to support struggling schools in turnaround efforts by allowing increased flexibilities in programming and contracting. These networks have yielded increases in enrollment and attendance rates, demonstrating improvements in engagement, which is a leading indicator of student success (pg. e36).

Weaknesses:

Although ample information and evidence was provided to support the design and implementation of the Innovation Network Programs (pg. e36-37), it is unclear how this program satisfies the evaluation criteria that requires the Applicant to demonstrate the extent to which this has directly drawn upon best practices from charter schools.

A process for identifying, disseminating, or even matching relevant best practices within struggling schools was not described in this section of the application; rather, the emphasis was placed indirectly on fostering innovation rather than focusing narrative around quality or performance (pg. e36-37).

Reader's Score: 1

Competitive Preference Priority 7 - Serving At-Risk Students

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

Strengths:

The State has developed and established an alternative accountability framework to account for schools that serve high risk populations with specialized missions (pg. e38). This includes programs that focus on dropout prevention or recovery, and other nontraditional indicators of success such as credit accrual and workforce readiness or certification. The application also highlights two charter schools that focus on serving specialized high risk populations, including one that exclusively serves students with disabilities, and another that serves students recovering from substance abuse.

Further, successes from these initially identified alternative schools were reporting in the application, highlighting program completion successes, the passing of postsecondary exams, or the earning of industry certification by more than 75% of students (pg. e38).

Weaknesses:

Although the efforts of Indiana organizations to develop dropout recovery schools is summarized (pg. e38), the extent to which the Department supported the generation of these, or supports them to date, was not included in the application narrative. The evaluation criteria specifically required that the applicant must demonstrate the extent to which it supports charter schools that serve at-risk students itself. Detail around whether the Department plays a role in the process for identification, designation, renewal, or evaluation of alternative schools was not included in the application. Further, the handful of schools highlighted in this section of the narrative (pg. e38-39) did not give any relative indication of their prevalence or proportionality throughout the sector.

As the application highlights service profiles of the charter sector to reinforce support for at-risk students (pg. e39), it should be noted that these figures compare an aggregate service profile to statewide averages. It is unclear how charter schools compare to their geographic schools in service to (or success with) at-risk students when compared to area schools. From the data provided, the assertion made in the application could not be validated.

Reader's Score: 1

Competitive Preference Priority 8 - Best Practices for Charter School Authorizing

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

Strengths:

Indiana statute requires that all authorizers adopt best practices in authorizing as defined by a nationally recognized organization with expertise in authorizing (pg. e41). Recent legislation also requires that parties interested in authorizing must engage in an application process through the State Board of Education. This process ensures compliance will be met with these standards codified in statute.

If an authorizer fails to close a school that does not meet minimum standards, the State Board may suspend the authorizer's ability to authorize (pg. e41). If this is not remedied, authority exists to remove the authorizer's ability to authorize permanently. These provisions in law allow for steps to be taken by the Department and State Board in situations where best practice is not occurring.

Many authorizing processes have components that are required by the State (pg. e42), including elements of the new school application review, pre-opening reviews, and criteria that must be satisfied for expansion or replication.

Weaknesses:

Although statute requires the adoption of best practices (pg. e41), the method or process for ensuring authorizer compliance with this legal requirement was not described. It is unclear what specific practices are monitored by the Department, or what the outcome of any analysis or review of annual reporting has been beyond submitting a five-year reporting requirements to the State Board of Education (pg. e42).

The minimum performance standards that must be met by an authorizer before significant action or intervention by the Department and State Board can be legally taken are not rigorous (pg. e41); it is unclear from the application what other interventions or sanctions might be allowable in advance of a situation where a school persists with an F rating for four consecutive years. Figures were also not provided to demonstrate whether the Department had ever intervened or suspended an authorizer for failure to adhere to best practices or for delayed decision-making with low performing schools to date.

Although authorizers have many components to their processes required by the State to promote best practices (pg. e42),

it is unclear what steps have been taken by the Department to ensure standardization or adherence to these requirements, or even what tools, supports, or resources are provided by the Department to train on, monitor, or ensure the understanding and utilization of these practices.

Reader's Score: 2

Status: Submitted

Last Updated: 06/26/2017 12:43 PM

Status: Submitted

Last Updated: 06/26/2017 12:43 PM

Technical Review Coversheet

Applicant: Indiana Department of Education (U282A170017)

Reader #2: *****

	Points Possible	Points Scored
Questions		
Selection criteria		
Flexibility		
1. Flexibility	10	10
Sub Total	10	10
Selection Criteria		
Objectives		
1. Objectives	15	12
Quality of Eligible Subgrant Applicants		
1. Quality of Subgrant	15	13
State Plan		
1. State Plan	20	17
Parent and Community Involvement		
1. Involvement	10	7
Quality of Project Design		
1. Project Design	15	13
Quality of the Management Plan, Theory of Action		
1. Management Plan	15	12
Sub Total	90	74
Priority Questions		
Competitive Preference Priority 1		
Periodic Review and Evaluation		
1. Review and Evaluation	5	5
Sub Total	5	5
Competitive Preference Priority 2		
Charter School Oversight		
1. Charter School Oversight	5	5
Sub Total	5	5
Competitive Preference Priority 3		
Authorizer other than LEA or Appeal Process		
1. Authorizer other than LEA	2	2
Sub Total	2	2

Competitive Preference Priority 4

Equitable Financing

1. Equitable Financing	2	1
Sub Total	2	1

Competitive Preference Priority 5

Charter School Facilities

1. Charter School Facilities	2	2
Sub Total	2	2

Competitive Preference Priority 6

Best Practices to Improve Struggling Schools/LEAs

1. Struggling Schools	2	1
Sub Total	2	1

Competitive Preference Priority 7

Serving At-Risk Students

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

Competitive Preference Priority 8

Best Practices for Charter School Authorizing

1. Best Practices	5	4
Sub Total	5	4

Total	125	105
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Technical Review Form

Panel #17 - Panel 17 - Indiana - 1: 84.282A

Reader #2: *****

Applicant: Indiana Department of Education (U282A170017)

Questions

Selection criteria - Flexibility

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

Strengths:

- Except as specifically provided in IC 20-24-8-4 and 20-24-8-5, Indiana charter schools are exempt from Indiana statutes that apply to a school corporation, rules or guidelines adopted by the SBOE, and local policies adopted by a school corporation that are not specifically incorporated into the charter agreement. A detailed list of the types and range of flexibilities preserved in state code begins on pg. e43.
- In its 2017 ranking of state charter laws, the Center for Education Reform rated Indiana's charter law an "A", only one of three states to earn the top mark. The National Alliance of Public Charter Schools echoed these findings several months ago in its rating of 44 states when Indiana – for the second year – achieved the distinction of having the state's top charter school law. Indiana's new Charter Facilities grant, lack of charter growth caps, multiple authorizers, and fair autonomy and accountability for schools were major contributors to its strong standing (pg. e43).
- IDOE also commits to upholding protections for autonomy in its own policies and practices. For example, when charters are able to use the charter agreement or authorizer approval to meet statutory requirements, the IDOE will defer to authorizer oversight. And while IDOE provides technical assistance to traditional and charter schools alike, it will not require participation in any training that is not required by state or federal law (pg. e44).

Weaknesses:

No weaknesses identified.

Reader's Score: 10

Selection Criteria - Objectives

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

Strengths:

Indiana's four objectives are clearly outlined and described beginning on pg. e44 and continuing through pg. e46, and they are reflected in detail in the management plan and theory of action section, pgs. e69-e77. The goals are specific, and in most cases, measurable. A high-level logic model is provided (pgs. e70-71), followed by a much more detailed table that specifies the resources needed, program activities, program outputs, and outcomes (pgs. e72-75). Baseline data is also provided (pgs. e76-77), which makes it possible to evaluate ambitiousness of the objectives.

1. Increase the # of high quality charter schools statewide via incubation, replication, expansion, or improvement. The goal is to award 60 subgrants over 5 years to high quality replication and expansion efforts (pg. e44-45), and the logic model breaks this down into short (10 new school subgrants) and mid-term (30 new school subgrants) goals before the long-term goal (60 in total). The baseline data (pg. e76) provided is that as of 2016-17, 93 schools are operating in Indiana. Elsewhere in the application (pg. e68), the applicant states that over the last five years, Indiana has opened an

average of nine charter schools per year but that they have reasons to believe there will be increases in applications due to changes in the landscape (described on pgs. e68). Given this, a goal of 12 subgrants per year (pg. e68) seems ambitious but feasible.

2. Leverage support specific to building the capacity necessary for the Indiana charter sector to grow quality programs. Supports will be provided to charter schools via partnerships with Indiana-based nonprofits with a record of success in support charter capacity and national standards of best practice in the sector; the areas in which support will be provided (i.e. teacher recruitment & retention, facilities, special education) are detailed on pg. e45. The activities and outputs are linked to the same short-, mid-, and long-term goals as Objective 1.

3. Evaluate the impact of charter schools on student outcomes. IDOE will utilize its comprehensive longitudinal school choice data set to evaluate the impact of charter schools on student achievement, families and communities, and to share best practices between charters and traditional public schools (pg. e45). An annual target set is for subgrantees to increase by 5% the students at or above proficiency on state Math and English assessments (pg. e76).

4. Support the implementation of high quality charter authorizing practices. The IDOE will work with a professional organization to provide statewide and individualized support to all eight authorizers in the state to ensure capacity to support charter growth. Common implementation issues will be identified via collaboration with all authorizers, which will inform the statewide technical assistance efforts. Individualized technical assistance will focus on building and sharing best practices and supporting voluntary efforts to improve in areas of growth related to authorizing standards (pg. e45-46). This objective is linked to ambitious and feasible short- and mid-term targets that culminate by year 5 in each active authorizer's percentage of charter schools identified as Quality/Improving increasing from Year 1's School Performance findings (pg. e77).

Weaknesses:

- While the application demonstrates that a goal of 12 subgrants per year (pg. e68) is ambitious and feasible, it does not demonstrate that it is rigorous. Given the average of 9 new schools opening per year over the last five years (pg. e68), 12 new schools opening is a stretch goal and it is not clear that Indiana will have a competitive applicant pool to consider for subgrant awards.
- While the logic model (pg. e70) and the application narrative clearly state the goal of 60 subgrant awards by the end of the grant period, the detailed table for objective 1 on pg. e76 names a long-term target that "at least 40 new high quality charter schools will be operational in Indiana" by the end of the grant period. It is unclear if this was a typo, or if Indiana is expecting that some subgrantees will not successfully open or will not remain operational. If this is the case, the application does not address it.
- Objective 2 is unclear, because the logic model frames the objective as if it is aligned to charter schools statewide, but the baseline data and performance measures provided are only focused on the nine Innovation Network schools (pg. e76).
- Without baseline data for Objective 3, which are to be "established at the end of the new charter school's first year of operation" (pg. e76), it is unclear whether the annual targets to increase by 5% the students at or above proficiency on state Math and English assessments is ambitious or feasible.

Reader's Score: 12

Selection Criteria - Quality of Eligible Subgrant Applicants

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

Strengths:

- The application provides background and baseline data to evaluate the likelihood that the eligible applicants receiving subgrants will meet those objectives and improve results.
 - o The application states Charter growth has been steady since the state passed its charter law in 2001, with an average of 8 schools opening every year. Detailed table of year-by-year openings to-date provided on pg. e46, for a total of 116 schools opened. During the same period, 26 schools have been closed leaving a total of 90 operating charters as

of the 2015-16 school year (pg. e46).

o Over the years, Indiana has also seen an increase in the number of schools opening outside of major city centers (i.e. Indianapolis and Gary). Charters are now located in 21 out of 92 counties, including a new pool of charters located in rural areas (pg. e47).

- The application also provides detail on its application process to demonstrate how its rigor will increase the likelihood of success, as well as how technical assistance will support the application process.

o To ensure the quality of eligible applications receiving subgrants, as a first step Indiana will use its rigorous RFP (application) process and Peer Review process for selecting subgrant recipients. IDOE will work with authorizers to identify subgrant applicants – new & existing – that have a demonstrated likelihood of meeting program objectives, and will coordinate with authorizers on monitoring to ensure a clear trajectory to success (pg. e53). As discussed in CPP #8 above, Indiana authorizers have a rigorous application process (pg. e47).

o In addition, IDOE will offer technical assistance to ensure all eligible applicants with capacity to improve student outcomes are able to apply (pg. e47). Technical assistance is described in more detail in State Plan section (d.3.i) and on pgs. e53-54. IDOE will partner with the Indiana educational nonprofit community to deliver technical assistance, and will provide funds to these organizations via a competitive RFP process.

- The application describes that in addition to local support; national organizations like the Illinois Facilities Fund, Walton Family Foundation, and Charter School Development Corporation have pledged support of Indiana’s CSP efforts and will enhance charters’ likelihood of meeting their outlined CSP objectives (pg. e54).

- Indiana also names and describes several charter schools like Herron and Paramount that are “poised to serve as quality subgrantees through replication”. The examples illustrate IDOE’s abilities to select subgrant recipients for replication that meet objectives to improve educational results for children (pg. e47). These schools also submitted letters of support with the application.

- The application provides data on school quality to illustrate that there is a pool of high quality schools that can be competitive applicants. As shown in Table 4 (pg. e50), between 2012-2013 and 2014-2015, the percentage of charters receiving an “A” or “B” on the state accountability system increased, while the percentage of schools receiving a “D” or “F” decreased. This was followed by a decline in charter performance in 2015-16 given transition to new state standards and methods of assessment which was reflective of a statewide decline for all public schools (pg. e50).

Weaknesses:

- While Indiana provides anecdotes on two high performing schools to demonstrate the strength of potential subgrant applicants (pg. e47), the information provided is not clearly aligned to the quality potential pool of applicants and it is unclear where these two schools are reflective of the pool of possible applicants.

- While Table 4 provides information on the potential pool of applicants via the percentage of “A” and “B” schools (pg. e50), the number of schools receiving grades was not provided so it is unclear how many “A” or “B” schools there actually are. Furthermore, while the application provides assurance that these trends are reflected statewide (pg. e50), it does not provide statistics for traditional schools to evaluate charter performance against in 2015-16.

Reader's Score: 13

Selection Criteria - State Plan

1. The State entity’s plan to--

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

Strengths:

1.

- IDOE has developed a robust solicitation, screening, and evaluation process to implement the Quality Counts program as proposed, both within the time period of this grant and when funds are no longer available (pg. e56). Section F (Quality of Project Design) includes a detailed description of the application and peer review process, along with application and rubric in Appendix F (pg. e57).
- Once an applicant is funded, IDOE will utilize a risk assessment to determine individualized school plans and scope their ongoing programmatic and fiscal monitoring throughout project period. The risk assessment will utilize periodic benchmarks to evaluate progress and tier supports and assistance based on need (pg. e57). To determine need, the risk assessment will utilize several criteria (listed on pg. e57) to determine need/level of monitoring from no apparent risk to low, moderate, or significant risk. Regardless of risk level, all subgrant recipients will receive on-site technical assistance and a monitoring visit within the first 12 months of school operation, and subgrantees will submit an annual progress report to the IDOE (pg. e57).
- Roles and responsibilities for staff responsible for carrying out the state plan are adequately described in the application and appendices (pg. e55-56, also Appendix B).

2.

- The IDOE is currently working with authorizers across the state to streamline reporting and data exchange. For ex, IDOE is working on creating a process for authorizers to access data directly from IDOE, which will minimize administrative burden on schools and on authorizers (pg. e23). Also, if a school's progress is fully evaluated by an authorizer's annual report, the IDOE will utilize the authorizer report in lieu of a duplicate report from the school (pg. e58).
- If it receives the CSP grant, the DOE will use its next quarterly meeting with authorizers to review their reporting requirements and make every effort to utilize existing structures, enhance data sharing, and reduce redundancies (pg. e58).
- IDOE will leverage the work and experience of authorizers as an important component of the subgranting process, in identifying promising new schools and existing high quality schools for possible expansion or replication. Examples of the specific work they will leverage is included on pg. e58.
- The Quality Counts application process will remain separate, however; no school will be guaranteed a grant for the mere fact that it has been authorized. All grantees must satisfy Grant Application requirements (pg. e59).

3.

- The provision of technical assistance will begin prior to eligible applicants receiving subgrants (pg. e59) and will be delivered by the IDOE and partner organizations (pg. e55). Best practices to be shared with subgrantees via technical assistance are included on pgs. e59-60.
- IDOE offers annual spring training for new and returning federal program directors at traditional public and charter schools to receive ongoing professional development and technical assistance, and opportunities to collaborate. And each fall the IDOE offers training specifically for charters to support effective implementation of CSP funds and federal programs, such as IDEA (pg. e61).
- IDOE will also leverage partners to support quality authorizing, and provides authorizers with accountability data necessary to complete their annual reviews of charter performance. IDOE also shares authorizers' accountability reports, proposals and renewal applications in one clearinghouse on its website as required by IC 20-24-9(b) (pg. e62).
- As noted above under the Objectives criteria, the IDOE will provide statewide and individualized support to all eight authorizers in the state (pgs. e45-46, e62).

Weaknesses:

While the state plan is well designed and articulated, there were a couple minor weaknesses:

- On pg. e58, the application states that the IDOE will integrate a charter school's score on its authorizer's application rubric into the CSP Grant Application. While this demonstrates efficiency and avoiding duplication of work, it assumes that all authorizer rubrics will score and evaluate charter applicants in the same way. It is unclear if these rubrics are standardized, or how charter performance under more or less rigorous authorizers will be evaluated for purposes of the CSP subgrant awards. It is unclear if this design will unfairly evaluate charters under an authorizer that does not have a strong framework or reporting practice.
- While the application describes technical assistance to subgrantees and that it will be delivered via state partners

(pgs. e55, 59-61), it does not indicate if training is optional or mandatory or how schools will be connected to state partners. It also does not provide a scope and sequence to provide sufficient detail on what types of supports subgrantees will receive nor does it describe specific methods for delivering technical assistance.

Reader's Score: 17

Selection Criteria - Parent and Community Involvement

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

Strengths:

- Indiana recognizes that partnering with families is a fundamental component of every charter school initiative. As part of the research and evaluation process, "the IDOE will solicit and review comments from families and community members in areas where CSP applicants and subgrant awardees open and operate charter schools." The goal of this feedback is to ensure that parents and communities have genuine opportunities to influence the implementation and operation of charter schools (pgs. e62-63). Parent feedback will also be solicited to evaluate the effectiveness of CPS-funded training and T.A. services (pg. e63).
- Required by law, public hearings provide an opportunity for public comment on the proposed school (pg. e63).
- IDOE will work with authorizers to develop a neutral, statewide survey designed to solicit meaningful comment from families and community members. Details on what the survey will include, and how it will go beyond simply gauging public support for charters, is included on pg. e64. The survey will be made public to facilitate a broader discussion about how best to ensure that charters are given the tools and support necessary to meet community needs.

Weaknesses:

- The application indicates that not all authorizers utilize community engagement as a component of the application process when it states: "most authorizers include a community engagement component as part of the application and application rubric" (pg. e63). We are not given information to assess proportionality or what "most" means.

Reader's Score: 7

Selection Criteria - Quality of Project Design

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

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

Strengths:

1.
 - As detailed in the State Plan, Indiana's robust quality charter program includes a rigorous application and review process (outlined in Appendix F as well) which will be utilized to select exemplary applicants for CSP funding opportunities

(pg. e64-65). Once an eligible applicant has received approval of its charter, the school may then request an application for a CSP subgrant. The applicant will submit its approved charter application, and supplementary information necessary to demonstrate completion of requirements outlined by CSP requirements (pg. e65).

- Each application for a CSP subgrant will be reviewed and rated by an external Peer Review panel. Details on requirements for participation, how individuals are selected to the panel, and how they will be trained are provided on pg. e65. A thorough description of criteria used to evaluate CSP applications is provided on pg. e66-67. Applications that address early childhood programs and secondary education, as well as rural locations, will receive preference points when applications are scored (pg. e67).

- IDOE staff will conduct the final review of all applications to ensure compliance and determine feasibility of final budget (pg. e67).

- Each eligible applicant's submitted budget is required to include no more than 18 months of planning or a total length of five years, and includes a "sustainability year" for the applicant to demonstrate how it will continue to carry out activities once funding period expires (pg. e60). A description of what the sustainability budget should demonstrate is included.

- A detailed tentative timeline for subgrant applications + peer review process is included on pg. e67. The planned timeline seems realistic and actionable.

2.

- IDOE expects to fund an average of 12 subgrants per year for 5 years at the maximum of \$900,000 per subgrant. A table depicting these estimates by year is included, and is based on data relating to the past 5 years of Indiana charter openings. While there was an average of 9 charters opened each year in Indiana over the last 5 years, the application discusses how changes in the landscape (i.e. availability of CSP funding, favorable changes to the funding formula) lead the IDOE to believe that there will be an increase (pg. e68).

- Indiana was awarded a CSP grant in 2010 for the 2010-15 grant period. During this time, 124 subgrants have been awarded to eligible charters, providing over \$30 million in support.

Weaknesses:

- Under the previous CSP subgrant information, the application does not discuss how the percentage of applicants awarded subgrants relates to the overall quality of the applicant pool. In short, the application does not describe what percentage (by year or in total) of new charters that opened in Indiana received subgrants so it is not possible to assess proportionality and the competitiveness of the awards.

- While pg. e65 provides a detailed description of the desired backgrounds of individuals to participate as peer reviewers, it is unclear if the peer review panel will include expertise that falls outside of instruction, evaluation, or policy (i.e. budget and finance, law).

Reader's Score: 13

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

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

1) The quality, including the cohesiveness and strength of reasoning, of the "logic model" (as defined in this notice), and the extent to which it addresses the role of the grant in promoting the State-level strategy for using charter schools to improve educational outcomes for students through CSP subgrants for planning, program design, and initial implementation and other strategies;

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

3) The adequacy of the management plan to--

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

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

Strengths:

1.

- The application includes a detailed logic model for the Indiana Quality Counts program on pgs. e70-71 that describes the resources, activities, and aligned outputs and outcomes to demonstrate achievement of the four main objectives detailed in the State Plan and throughout the application narrative. The short, mid, and long-term goals are specific and measurable. See strengths listed under Objectives section.

2.

- A much more detailed and thorough expansion of the logic model is provided on pages e72-75 for each of the four objectives. The tables outline the resources needed to support strategies and deliverables, the activities/strategies to meet the objectives, the outputs/deliverables resulting, and aligned outcomes.

- The project-specific performance measures and data collections and reporting methods aligned with the logic model are described in detail on pages e76-77. Notably, the tables include baseline data for each of the objectives from which to assess the short, mid, and long-term targets. Given baseline data, the targets seem reasonable but also ambitious.

3.

- The IDOE will retain direct management of 100% of funds, and will utilize 3% to employ a Charter School Specialist to be directly responsible for administering the subgrant process and coordinating with partners on technical assistance. IDOE will leverage several partners to carry out a rigorous application and review process, differentiated monitoring, and technical assistance. (pg. e55). A tentative timeline for the grant application and peer review process is included (pg. e67).

- Details on staffing structure, roles & responsibilities, and description of budget line items to be expended on personnel are included on pg. e55-56. These are reasonable and aligned with program objectives. Job descriptions for each role are also included in Appendix B.

- The administrative location of this project (the IDOE) ensures that staff responsible for implementation also have strong knowledge of other federal programs in order to provide appropriate technical assistance and ensure full utilization of funds (pg. e61).

- Key personnel on the project will be a part of an internal workgroup/consultancy across all IDOE offices to develop comprehensive charter supports across key operational areas (named on pg. e61) and to identify potential issues with charter support and implementation. Results of this consultancy are shared with authorizers on a quarterly basis so IDOE and authorizers can serve as strong partners in monitoring and support (pg. e61).

- IDOE has included a risk plan for keeping subgrantees on target over the course of the grant period in order to minimize the potential for compliance issues. Furthermore, they show evidence of making decisions and recommendations and setting targets based on 10+ years of data specific to Indiana's charter landscape (pg. e77).

- In addition to proactive measures (like the risk plan referenced above), the application demonstrates how IDOE's robust evaluation process and monitoring plan combined with capacity support with support the successful implementation of the CSP grant (pg. e78).

Weaknesses:

- The applicant does not provide timelines or milestones for many of the activities described in the management plan (apart from the application and peer review process on pg. e67).

- The applicant does not adequately address how compliance issues will be dealt with. While the application provides a number of specific staff members who will be responsible for carrying out the management plan, this element of the criteria was only addressed by referencing proactive measures to prevent non-compliance (pg. e78). It is unclear how the applicant will address any major compliance issues that may arise.

Reader's Score: 12

Priority Questions

Competitive Preference Priority 1 - Periodic Review and Evaluation

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

Strengths:

The application provides adequate detail to demonstrate how periodic review and evaluation is preserved in Indiana State Code.

- Indiana State Code (IC 20-24-4-1, beginning pg. e202) provides for periodic review (every 5 years) and evaluation by the authorizer of each charter school. Authorizers are "required to hold charters accountable for achieving the educational mission and goals of the charter school, including evidence of improvement across numerous academic indicators (provided on pgs. e20-21) and evidence of compliance with applicable laws, rules, regulations, and terms (pg. e21).
- At each five-year renewal point, or if a charter is in violation of minimum standards, the authorizer can impose meaningful consequences such as revocation, non-renewal, or academic interventions. Charters that remain in the lowest category ("F") of school improvement for four years may not be renewed unless the authorizer petitions the State Board of Education (SBOE) and SBOE determines sufficient justifications exist to continue allowing the school to stay open (pg. e21).
- Indiana authorizers require their start-up schools to develop multi-year implementation plans that provide an initial framework for routine monitoring. More detail on what goes into these plans is provided (pg. e21).
- Indiana Code (IC 20-24-9-9) requires each authorizer to submit an annual Performance Report to the Indiana Department of Education (IDOE). There are 11 separate required pieces to this report, such as state assessment results, student enrollment data, and information on schools that closed or were not renewed. (More detail included on pg. e22).
- Indiana authorizers must monitor and evaluate their schools annually, in addition to at the five-year renewal point. Examples of methods used for evaluation and monitoring are detailed, such as regular communications and site visits, and regular reporting of operational, financial, and academic data (pg. e22). Annual reviews also include opportunity to impose meaningful consequences ranging from requiring corrective action plans, additional technical assistance or PD, imposing probationary status, or taking steps for revocation (pg. e23).
- Under Indiana law, authorizers must notify schools of problems that lead to possible revocation and provide schools with an opportunity to respond and remedy problems (pg. e22).

Weaknesses:

While the applicant states that charters that remain in the "F" category of school improvement for four years may not be renewed (pg. e21), there are no other activities described to take appropriate action or impose meaningful consequences on these persistently low-performing schools before they reach the point of non-renewal. While imposing nonrenewal on these schools qualifies as appropriate and meaningful, a description of earlier interventions is not provided.

Reader's Score: 5

Competitive Preference Priority 2 - Charter School Oversight

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

a) That each charter school in the State--

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

chartering agency;

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

3. Demonstrates improved student academic achievement; and

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

Strengths:

1.

- IC 20-24-1-3 specifically defines the charter as a contract, specifying numerous requirements of the legally binding contract to ensure that all charters have strong oversight (pgs. e23-24). The charter agreements must "confer certain rights, franchises privileges, and obligations on a charter school" (IC 20-24-4-1) and explicitly confirm that each charter school is a public school (pg. e24). The charter contract must include assurances if the charter school intends to contract with an education service provider (pg. e24 and IC 20-24-3-2.5(4)).

- Created as a separate document from the application, charter agreements (contracts) are executed by the school governing board and the authorizer. Within the charter, contracts, roles, powers, and responsibilities for each party are defined, including academic/financial/operational performance expectations. Annual performance targets are also defined within charter agreements (pg. e24).

2.

- Charter schools are required by IC 20-24-8-5(1) to participate in required financial audits by the Indiana State Board of Accounts (SBOA). Statute requires charter to meet GAAP principles and to contract with a Private Examiner) to conduct an annual independent audit (pg. e23, e24).

- Failure to meet GAAP principles is grounds for revocation as per IC 20-24-9-4(4) (pg. e24).

- Audits must be submitted to and approved by the SBOA and the charter school's authorizer. Many authorizers (examples provided) require quarterly or biannual financial reporting in addition to formal annual audits (pg. e25).

3.

- Indiana law requires authorizers to annually report a variety of metrics related to student achievement (IC 20-24-9-2), and each charter must include explicit methods by which the school will be held accountable to achieving its educational mission and goals, i.e. state assessment results, attendance rates, student academic growth, etc. In most cases, monitoring these goals is done by incorporating the authorizer's Accountability and Performance Framework into the Charter Agreement (pg. e25).

- ICSB, for example, uses 12 academic indicators (16 for high schools) designed to measure whether the school is demonstrating academic achievement. Other authorizers (OEI, BSU) use slightly different sets/numbers of indicators.

- In 2016, the charter law was amended to require the SBOE to provide a formal evaluation of the overall state of charter outcomes in Indiana, at least once/5 years. Results are posted on SBOE website (pg. e26).

- (More detail on how renewal decisions are made, and how annual performance targets are used, is included on pg. e27).

- All charter renewals must be based on evidence of school's performance over the charter contract term in accordance with the performance framework set forth in the charter (IC 20-24-4-3(a)(1) (pg. e25). The IDOE states: "Improved academic achievement is the cornerstone of all renewal and closure decisions" and the Indiana Charter School Board's (ICSB) Accountability System explicitly states that school performance is the single most important factor in assessing schools and making renewal decisions (pg. e26).

Weaknesses:

No weaknesses identified.

Reader's Score: 5

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

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

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

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

Strengths:

- In addition to LEAs, colleges, universities, Mayor's offices, and the state charter board can apply for chartering authority (IC 20-24-1-2.5, also pg. e28). Details also provided on what must be included in the applications for chartering authorizing. Currently, Indiana has 8 different authorizers and of the 8, five have authority to authorize statewide (pg. e28).
- While not explicitly referred to as an "appeals process", charter developers do have recourse when an application is rejected. They are permitted to amend and resubmit their proposal to the authorizer, or to submit a proposal to another authorizer. There is no limit on the number of times a developer may submit a charter proposal as per IC 20-24-3-11 (pg. e28-29).

Weaknesses:

No weaknesses identified.

Reader's Score: 2

Competitive Preference Priority 4 - Equitable Financing

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located ensures equitable financing, as compared to traditional public schools, for charter schools and students in a prompt manner.

Strengths:

- State funding (via state tuition support) is allocated equally to traditional and charter schools, and includes a foundational or base level of funding based on grants of \$5,088 per pupil plus state categorical grants, which are also available equally to charter schools (see pg. e29 for more detail). Charters and traditional schools receive such funding equally and within the same time frames (pg. e32).
- In 2016-17 the state's Complexity Grant (one of the state categorical programs) calculation related to ELL learners explicitly excluded charters, BUT this step has been corrected for FY2018 to specifically provide for charter access to ELL adjustments (IC 20-43-13-3, and pg. e32).
- In 2005, the General Assembly directed the IDOE to identify and apply for all federal funds for which charters are eligible, including funding requiring matching grants for charter facilities. In 2009, Indiana applied for and received a Charter School Facilities Incentive Grant and as a result the GA created the Charter School Facilities Assistance Program to make grants & loans available to charters for facilities purposes (pg. e30). More detail provided on implementation of CSFAP on pgs. e30-31.
- In 2015, the GA created two additional programs to provide funding for charters – the Charter and Innovation School Advance Program (which provides loans to be used for educational purposes and refinancing of existing debt) and the Charter and Innovation School Grant Program (created to address the funding gap caused by charters' lack of access to local funding – more detail on pg. e31).
- In 2016, the GA passed two laws to further codify and ensure that charter schools be treated equally when it comes to state and federal funding (see pgs. e32-33).

Weaknesses:

- Local tax revenues are generally not available to charter schools, as described on pgs. e29-e30. The application explicitly recognize that this results in a significant difference, or disparity, in total funding (pg. e30).
- The Grant Program, but not the Advance Program, was continued in the most recent State Budget approved in 2017 (pg. e31).

Reader's Score: 1

Competitive Preference Priority 5 - Charter School Facilities

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

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

Strengths:

- Indiana provides each qualifying charter school that meets criteria outlined in IC 20-24-13-4 a \$500 per pupil grant to offset facilities, transportation, and other capital costs. Details on who qualifies provided on pg. e33.
- Independent non-government entities like the Illinois Facilities Fund and the Charter School Development Corporation directly support facilities acquisition for charters in Indiana. A copy of IFF's progress against their Indiana Charter School Facilities Loan Fund from 2012-2017 has been included as additional evidence, along w/ letters of support, in the Appendix (pg. e33).
- Indiana statute offers charter schools access to unused public school facilities (pg. e33), at no-cost (\$1) rates. See below (Right of first refusal) or pg. e34 for more detail on lease/sale terms.
- Under IC 20-26-7-1, the district must determine which real or personal property is no longer needed for school purposes and such property should be first listed on a website maintained by IDOE for prospective charter developers to view. The IDOE is required to update this list each year in August (pg. e34).
- Indiana charters are eligible to access the Indiana Bond Bank (IC 5-1.5); additionally, under IC 20-24-7-6, charters may explicitly receive proportionate distributions of a school corporation's capital project fund (pg. e34).
- Charters have first right to purchase or lease public school buildings under IC 20-26-7-1, and following the protocol outlined in IC, the district cannot sell or lease the building for more than \$1 per year as long as the charter school uses the building for classroom instruction.

Weaknesses:

No weaknesses identified.

Reader's Score: 2

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

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

Strengths:

- The application describes the GA's enactment of IC 20-25.7 (Innovation Network Schools) in 2015, which recognizes that charters and traditional public schools should have freedoms and autonomy to create optimal learning environments for students. Under this law, teachers or administrations or the governing board of a traditional school can establish an innovation network school or innovation network charter school, or reconstitute an eligible school as an innovation network school. This gives the school operator full operational autonomy as well as "charter-like" flexibility (pg. e35). Significant detail on the purpose, parameters, and pathways of Innovation Network Schools is provided on pgs. e35-37.
- Indiana Public Schools' (IPS) early adoption of creating innovative school models has shown several leading indicators of student success, including increases in enrollment & attendance rates (pg. e36).
- Innovation Network Schools are an important part of ensuring an excellent school in every neighborhood and representative innovative best practices for improving struggling schools and districts in Indiana (pg. e36). Four Innovation Network Schools and their accomplishments are described on pgs. e36-37.

Weaknesses:

- While reconstitution/restart of struggling schools is an important pathway available to administrators of traditional schools, there are no methods identified to support struggling schools prior to reaching levels of chronic underperformance. In short, the applicant does not describe methods to support struggling schools with best practices apart from those of last resort (reconstitution), nor do they describe what those best practices are apart from charter-like autonomy and flexibility. The application conflates "best practices" with autonomy and flexibility without identifying specific best practices or describing a plan to identify them.

Reader's Score: 1

Competitive Preference Priority 7 - Serving At-Risk Students

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

Strengths:

- Indiana has developed numerous models for dropout recovery schools (see pgs. e37-38), and each of these is considered an adult high school per IC 20-24-4-1(16). Recognizing that these schools serve unique student populations that don't fit into the traditional accountability model, the General Assembly directed the State Board to adopt an alternative accountability system to assess their performance. As an SEA, the IDOE has supported these schools through an alternative accountability rule that holds them accountable to their unique model (pg. e36). Details on adult accountability rules are provided on pg. e38. As of 2016-17, Indiana is home to a dozen adult high schools (both traditional and charter – pg. e38).
- The application describes two charter schools serving almost exclusively at-risk populations that have developed innovative partnerships with community organizations (more detail on these schools provided pg. e38-39).
- Indiana charter schools also provide supports necessary to ensure all at-risk students are successful and have historically demonstrated a commitment to serving diverse populations.
 - o Tables 1 and 2 on pg. e40 show diverse student enrollment across traditional and charter schools. In 2015-16, an average of 66% of students enrolled in charters were minorities, far exceeding the average minority enrollment of 27% in traditional public schools. More subgroup data detailed on pg. e39 and displayed on tables on pg. e40.
 - o The application indicates that in 2015-16, nine out of ten adult high schools receiving grades under the new accountability system were high-quality (received an A or a B), with an average graduation to enrollment in the 90th percentile and an average of almost 75% of graduating students passing an AB or IB exam (pg. e38).
- The Complexity Grant, referenced in CPP #4 demonstrates another way in which the State supports low-income and struggling schools (with supplemental funding that acknowledges additional resources needed to serve these populations).

Weaknesses:

- The schools highlighted on pgs. e38-39 do not indicate the prevalence of innovative models serving at-risk students across the sector. While their models should be commended, the anecdotal evidence provided does not successfully show how at-risk students are being supported across all Indiana charter schools.

Reader's Score: 1

Competitive Preference Priority 8 - Best Practices for Charter School Authorizing**1. To receive points under this priority, an applicant must demonstrate the extent to which it has taken steps to ensure that all authorized public chartering agencies implement best practices for charter school authorizing.****Strengths:**

- From 2005-2013, Indiana worked to include all of NACSA's best practice recommendations to establish authorizer standards, require annual reports on school performance, and provide sanctions for failing authorizers in its charter law. In 2011, Indiana expanded the number of eligible authorizing entities and established a statewide charter authorizer (pg. e41). By 2013, Indiana required all authorizers (IC 20-24-2.2-1.5) to "adopt standard of quality charter school authorizing, as defined by a nationally recognized organization with expertise in charter school authorizing" (pg. e41). And in 2015, the GA enacted IC 20-24-2.2-1.2 which requires any new proposed authorizer to apply to the SBOE and must submit annual reports that include evidence that the authorizer follows quality authorizing standards (pg. e41).
 - o Each authorizer has a rigorous authorizing process, which must include at minimum submission of an application, a capacity interview, and a public hearing. A detailed list of what applicants are required to demonstrate to receive approval is included (pg. e42).
 - o Once schools are approved, each authorizer has a rigorous pre-opening process that must be completed (pg. e42).
 - o As discussed in CPP #1, authorizers are required to publish an annual report on the performance of its portfolio of charters, further ensuring authorizer accountability. Also, IC 20-24-2.2-8 requires the SBOE to conduct a formal evaluation of the overall state of charter school outcomes in Indiana every five years (pg. e42).
- One of the four stated objectives of Indiana's plan is to support the implementation of high quality charter authorizing practices (pgs. e45-46). The IDOE will work with a professional organization to provide statewide and individualized support to all eight authorizers in the state to ensure capacity to support charter growth. Common implementation issues will be identified via collaboration with all authorizers, which will inform the statewide technical assistance efforts. Individualized technical assistance will focus on building and sharing best practices and supporting voluntary efforts to improve in areas of growth related to authorizing standards (pg. e45-46).

Weaknesses:

- The authorizer's process leading to nonrenewal or revocation lacks rigor. The application indicates that "charter schools that remain in the lowest category of school improvement for four consecutive years may not be renewed unless the authorizer petitions to the SBOE..." (pg. e41), but the application lacks detail on what sanctions or interventions may be imposed along the way prior to closure.

Reader's Score: 4

Status: Submitted
Last Updated: 06/26/2017 12:43 PM

Status: Submitted

Last Updated: 06/26/2017 12:43 PM

Technical Review Coversheet

Applicant: Indiana Department of Education (U282A170017)

Reader #3: *****

	Points Possible	Points Scored
Questions		
Selection criteria		
Flexibility		
1. Flexibility	10	10
Sub Total	10	10
Selection Criteria		
Objectives		
1. Objectives	15	12
Quality of Eligible Subgrant Applicants		
1. Quality of Subgrant	15	11
State Plan		
1. State Plan	20	18
Parent and Community Involvement		
1. Involvement	10	10
Quality of Project Design		
1. Project Design	15	12
Quality of the Management Plan, Theory of Action		
1. Management Plan	15	12
Sub Total	90	75
Priority Questions		
Competitive Preference Priority 1		
Periodic Review and Evaluation		
1. Review and Evaluation	5	5
Sub Total	5	5
Competitive Preference Priority 2		
Charter School Oversight		
1. Charter School Oversight	5	5
Sub Total	5	5
Competitive Preference Priority 3		
Authorizer other than LEA or Appeal Process		
1. Authorizer other than LEA	2	2
Sub Total	2	2

Competitive Preference Priority 4

Equitable Financing

1. Equitable Financing	2	1
Sub Total	2	1

Competitive Preference Priority 5

Charter School Facilities

1. Charter School Facilities	2	2
Sub Total	2	2

Competitive Preference Priority 6

Best Practices to Improve Struggling Schools/LEAs

1. Struggling Schools	2	1
Sub Total	2	1

Competitive Preference Priority 7

Serving At-Risk Students

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

Competitive Preference Priority 8

Best Practices for Charter School Authorizing

1. Best Practices	5	4
Sub Total	5	4

Total	125	107
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Technical Review Form

Panel #17 - Panel 17 - Indiana - 1: 84.282A

Reader #3: *****

Applicant: Indiana Department of Education (U282A170017)

Questions

Selection criteria - Flexibility

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

Strengths:

The applicant points to the state law's provision of a general exemption from laws and rules that govern traditional public schools. See e43. There is tremendous flexibility in terms of who may authorize charter schools. Charter schools are legally and fiscally autonomous, teachers are employees of the school or service provider and the school's ability to contract with service providers is not restricted. See e43-44. Based on this flexibility, Indiana's charter school law has been recognized as a model by two national organizations. See p. e43.

Weaknesses:

No weaknesses found.

Reader's Score: 10

Selection Criteria - Objectives

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

Strengths:

The applicant clearly lays out four objectives that are reasonable and sound objectives that align with the purposes of the CSP grant. See pp. e44-46. Certainly increasing the number of high quality charter seats available in the state, leveraging charter support through partnerships with nonprofit experts and supporting the continued quality of charter school authorizing in the state are all important and appropriate objectives under the grant.

On objective one, the number of new charter schools established over the course of the grant is very ambitious.

Objective three provides ambitious goals to improve student achievement in the state and specifically charter school student achievement with clear and relatively aggressive metrics. See pp. e76-77.

Objective four also provides clear and ambitious goals to increase the quality of the charter school authorizing community in the state. See pp. e77.

Weaknesses:

It is difficult to evaluate how ambitious objective 2 is given that the performance measures provided on p. e76 are specific to only one portion of charter schools in the state. If the intent is to grow quality programs across the sector more performance measures should be provided that reflect that.

Although Objective 3 is ambitious, it is unclear as to whether it is referencing increases for all students or just subgrantee students. The performance measures suggest it is just subgrantee students, but the objective reads as if it is all students across the state. (Compare e45 to e76).

Reader's Score: 12

Selection Criteria - Quality of Eligible Subgrant Applicants

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

Strengths:

The applicant describes a rigorous process both for initial approval as a charter school and for approval for a subgrant (e49), and states that it will provide technical assistance to high potential subgrant applicants, all of which increase the likelihood of quality charter subgrantees. See p. e47. There is also a number of candidates for replication that have a proven track record of success and significant demand for more seats. See pp. e47-48.

The applicant also appropriately points to the strong non-profit and foundation support in Indiana as well as the federal facilities grant as evidence that new charter schools have the resources to be successful. See p. e51.

The state has a robust system of accountability that includes a transparent school grading system that measures performance on several different areas. See pp. e49-51. The number of closures indicate that the authorizers are willing to close schools that do not meet performance requirements. See p. e46. Based on the information provided from the grading system it appears that charter schools have been improving, notwithstanding the 2015-16 that appears to have been a result of changes in the state testing and cut scores. See p. e50. The applicant also provides evidence that charter schools in its two largest cities, Gary and Indianapolis are slightly outperforming (Indianapolis) or significantly outperforming (Gary) their district school counterparts. See p. e51.

A strong subgrant and peer review process is also described in the state plan. See pp. e55-e60.

Weaknesses:

The response to this criteria was solid and encouraging, but it was not complete. Detail on how various student subgroups performed in comparison to the rest of the state and how they compared in terms of academic growth in addition to proficiency was not fully addressed therefore it was difficult to assess the potential quality of future subgrantees. There was also no comparison of the performance of charter schools as opposed to traditional public schools prior to 2015-16.

Reader's Score: 11

Selection Criteria - State Plan

1. The State entity's plan to--

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

Strengths:

(a)The applicant specifically describes its staffing for the project and appears to have a strong track record of experience in implementing the CSP grant. See pp. e55-56.

Adequate monitoring of the grant will be accomplished through a tiered risk management process that allows the state to effectively and efficiently direct attention and resources toward where it will be needed most, such as where schools are showing signs of struggle. See p. e57. Technical assistance virtually and on-site for the first year, when it is generally the most important time for such assistance, and annual progress reports will also be used to ensure success. See p. e57.

(b) The applicant describes how it will partner with authorizers wherever possible to avoid duplication of work for charter subgrantees and includes the example of using the authorizer's annual progress reports in lieu of a separate CSP report where the same information is being provided. They also state that they will integrate the authorizer's application process into its CSP grant application to avoid duplicating the work done there. See pps. E58-59.

(c)(i)In terms of technical assistance to eligible applicants, the state intends to hold a bidder's conference and to partner with charter support networks to highlight best practices and successful charter schools startup and replication examples in a variety of areas listed in the response. See p.e59. The state will also partner with charter support organizations in the state once an applicant receives a grant. See p. e59. The applicant also states that the planning grant will be limited to 18 months as required by the criterion and that it will provide assistance to subgrantees through a subsequent "sustainability year" to ensure success as schools transition to a budget that no longer includes grant funds. See p. e60.

(c)(ii) The applicant will use CSP funds to survey authorizers to identify barriers and challenges to the adoption and implementation of best practices. They will then solicit a national organization with expertise to provide technical assistance in how to address such barriers. See p. e62.

Weaknesses:

The stated increase in percentages of A and B and D and F charter schools on p. e58 is incorrect based on the most recent set of school grades provided in the table on p. e50.

It is not clear in the application whether the technical assistance the applicant will provide to authorizers is optional or mandatory. This might particularly be important if the authorizers are considered "at risk".

Reader's Score: 18

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

The applicant pledges that as part of its research and evaluation process, it will solicit and review comments from families and community members where CSP applicants and subgrant recipients open schools. p. e62. It will then use findings and information from that input to inform training and technical assistance and to determine where further focus group meetings and other strategies should be located to ensure such input. P. e63

Specifically, the applicant describes surveys that it will work with authorizers to develop that will solicit input from parents and community members to get input on a variety of questions surrounding charter schools as an option in their community. P. e63-64. The applicant also describes a survey it will use to get input from charter schools themselves as to what has worked and what has not when it comes to charter schools and their relationship with their surrounding communities. P. e64.

It is further stated that the above-referenced surveys would be used to facilitate a broader discussion on the state's education landscape and the role charter schools have to play in it. P. e64.

Weaknesses:

On page e63, the applicant states that "most" authorizers include a community engagement component. No further information is provided in terms of what authorizers do not include a community engagement. Charter school level input from parents and community members is a critical aspect of this criterion.

Reader's Score: 10

Selection Criteria - Quality of Project Design

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

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

Strengths:

(F)(1) The applicant has laid out a rigorous application and review process and references its communications and technical assistance that it will provide pre-application and pre-award. See Appendix F and pp. e64-65. The applicant's peer review process involves individuals with expertise and impartiality to provide a fair and rigorous review of applicants to determine those with the best potential for success. See p. e65.

The applicant states that the grant will be competitive and the applicant lays out a list of items that will be included to ensure that applicants will demonstrate the capacity to create high-quality charter schools including things like capacity to implement the proposed educational program, clear and meaningful performance goals, and a strong budget and financial controls. See pp. e66-67.

Clear timelines are set out for how the process will be expected to unfold including subgrant and peer review processes. See pp. e67-68.

(f)(2) The year-by-year estimate of the number of subgrantees is aggressive, but not unreasonable given the support and evidence provided to explain the number. With the availability of large CSP startup grants and a steadily increasing per student funding amount, the expectation of growth seems reasonable.

The applicant states that 124 subgrants and over \$30 million were awarded during the previous grant period (2010-2015). See p. e69.

Weaknesses:

(f)(1) Only two peer reviewers per application seems insufficient. This is minor, but in order to ensure the type of expertise the applicant claims in such reviews it would likely take more than two peer reviewers. See p. e66.

(f)(2)The applicant says it will have a competitive application process for the CSP subgrants. See p. e67. However, with the aggressive number of proposed subgrantees it is more difficult to believe that will be the case for the entire period of the grant. Certainly the availability of CSP funds and the increase in state education funding will help, but it is not clear that this is sufficient to ensure that there will be enough new charter schools to meet the requirement that the year-by-year estimate is reasonable. The likelihood that enough new schools will be approved to allow the process to be competitive is suspect.

There was no information provided of the percentages of eligible applicants that received subgrants in the prior CSP grant and no discussion of how that percentage may have effected the quality of the previous subgrant applicant pool.

Reader's Score: 12

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

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

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

Strengths:

The logic model provided clearly addresses the role of the grant and how the applicant will use it to increase the number of high quality charter school seats available within the state in a way that improves educational outcomes for students. See pp. e70-71.

The applicant clearly states in the logic model, the activities which it will engage in and/or facilitate to accomplish the objectives. Broad timelines are provided in terms of the number of charter school subgrants being awarded and when they will be awarded. See p. e68. The response to Selection Criteria (d) provides information as to staffing responsibilities (see p. e55) and the response to Selection Criteria (f) provides a timeline for the application and review process in year one. See p. e67.

The performance measures provided are, for the most part, aligned with the objectives and activities stated within the logic model. See pp. e76-77. Specifically, on objective four, the applicant's objective is measured by an increase in each active authorizer's percentage of quality schools and will be supported by a partnership with a professional organization with expertise to collect baseline data, identify opportunities for growth, assist in the development of work plans and provide a follow up review on the implementation of those plans. See pp. e75 and e77.

The management plan and the budget narrative (pp. e687-690) provides many of the timelines for when the activities will take place and how they will be funded.

The applicant describes a rigorous application, review and monitoring process and p. e77 references a "risk plan" for keeping subgrantees on target over the course of the grant as a means by which to minimize compliance issues. See also pp. e137-138. It also provides a list of chiefs, directors and specialists that will have a role in ensuring the state's compliance with CSP grant requirements (See p. e77) and that it will be done on time and within the detailed budget

provided. See budget narrative on pp. e687-690.

Weaknesses:

While there are some staffing responsibilities and timelines provided in previous responses as noted above, the detail is lacking as to who will be responsible for the activities referenced and when they are expected to be completed.

While there are timelines provided for the subgrant process including the peer review process(e67), the applicant does not provide more detailed timelines for many of the activities listed in the management plan.

The response provides information as stated above regarding how its processes address any previous compliance issues or finding relating to CSP. However, there are no specifics as to who specifically will be responsible for addressing such issues.

Objective one does not provide a baseline for how many high quality charter schools there currently are. It simply states that there are 93 charter schools in the state. See p. e76.

Reader's Score: 12

Priority Questions

Competitive Preference Priority 1 - Periodic Review and Evaluation

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

Strengths:

The applicant meets the requirements of this competitive preference priority by virtue of its statutory requirement that all charter schools must undergo a review by their authorizer at least one time in each five-year period the charter is in effect to determine the school's progress in meeting the academic goals set forth in the charter. See p. e20. Indiana also required its charter school authorizers to issue an annual report setting forth how each of its charter schools is performing in terms of meeting certain academic benchmarks. See p. e22. Both the five-year and annual reviews provide opportunities and authority for authorizers to take action to address problems at a school and may even require nonrenewal for very poor performance (four straight years of a school grade of F). See p. e23.

Finally, the state is also required to do a formal evaluation of charter school performance every five years. See p. e23.

Weaknesses:

No weaknesses found.

Reader's Score: 5

Competitive Preference Priority 2 - Charter School Oversight

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

a) That each charter school in the State--

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

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

3. Demonstrates improved student academic achievement; and

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

Strengths:

Indiana law provides for a charter contract between the school and its authorizer that sets forth the rights and responsibilities of the school and authorizer. See p. e24. Those provisions are clearly laid out in the response.

The law also requires an annual independent financial audit. That audit is submitted and approved by the state's auditing agency and its authorizer. See pp. e24-25.

State requirements clearly states that academic performance is one of the most important factors in determining whether to renew or revoke a charter (e26) and there are provisions that actually require revocation where performance is poor enough to warrant it (four Fs). E26. All authorizers have previously agreed to use such performance across all groups of students described in the criteria as the most important factor when reviewing a charter school for renewal or revocation. See p. e27.

Weaknesses:

No weaknesses found.

Reader's Score: 5

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

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

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

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

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

Strengths:

The applicant clearly meets this criteria as the state allows colleges and universities, cities and a state charter board to authorize charter schools. see p. e28.

Weaknesses:

No weaknesses found.

Reader's Score: 2

Competitive Preference Priority 4 - Equitable Financing

- 1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located ensures equitable financing, as compared to traditional public schools, for charter schools and students in a prompt manner.**

Strengths:

The state portion of funding appears to be equitable and the state has provided and/or is providing several other grants and programs that supplement the funding provided by the state. See p. 29. Programs described include loan funds, an innovation grant program, and a grant for schools (charter and traditional) that serve high populations of low income students. See pp. e29-32. Charter schools are also required by law to receive their fair share of federal funds for which they are eligible. See pp. e32-33.

Funding payments for charter schools are sent out in the same prompt manner as traditional schools. see p. e32.

Weaknesses:

Local tax revenue funds are not shared with charter schools (e29) and the programs referenced above do not come close to making up the difference. While some of the state's efforts to mitigate the gap, which is described as being between \$2,200 and \$2,600 per student (e30), are commendable, the current funding structure for charter schools in Indiana cannot be characterized as equitable.

Reader's Score: 1

Competitive Preference Priority 5 - Charter School Facilities

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

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

Strengths:

The state provides a \$500 per pupil capital/transportation grant for eligible charter schools. see p. e33. Charter schools also have access to the state bond financing fund. See p. e34. They also have a right of first refusal on school district facilities that are unused and being considered for sale or exchange for other property. See p. e34. A charter school may buy or lease such a facility for virtually no cost. See p. e34. Almost all of the criteria are met.

Weaknesses:

No weaknesses found.

Reader's Score: 2

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

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

Strengths:

The applicant describes its Innovation Network Schools program. See pp. e35-36. The program leverages the type of innovation, flexibility and autonomy that charter schools enjoy to allow districts and traditional public schools within districts to use those same advantages to serve the specific needs of the individual students at the school. The applicant also provides a couple of examples including a STEM high school with a partnership with a state university. See pp. e36-37.

Weaknesses:

While the program described above does provide traditional public schools with the opportunity to take advantage of charter-like flexibility, the applicant does not provide any specific examples or even general efforts to use best practices from charter schools to assist traditional public schools and school districts with struggling schools and students. The Innovation Network Schools program certainly provides an avenue to do that more easily, but there was no indication that any collaboration or sharing of best practices is happening or being promoted.

Reader's Score: 1

Competitive Preference Priority 7 - Serving At-Risk Students

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

Strengths:

The state appears to have a robust portfolio of charter schools that are serving at risk and economically disadvantaged students and several such schools and networks of schools are listed. See pp. e37-38. The state has also recognized the challenge of alternative education and serving at risk high school students by developing an alternative accountability framework. See p. e38. This framework recognizes the unique work that such schools are doing and the importance of weighing factors that may be different than the accountability system that applies to other public schools.

Although not mentioned specifically in the response to this criteria, the state also provides a significant amount of funding to charter and traditional schools that serve high risk populations of students through the state's complexity grant. See p. e31.

Weaknesses:

No weaknesses found.

Reader's Score: 2

Competitive Preference Priority 8 - Best Practices for Charter School Authorizing

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

Strengths:

In 2013, after eight years of working with National Association of Charter School Authorizers, the state required by law that all authorizers adopt standards for high quality authorizing as defined by a nationally recognized organization with expertise in that area. See p. e41. Authorizers must apply to the state to authorize charter schools and are required to submit annual reports on school performance that includes evidence of the best practices and standards stated above. See p. e41.

The applicant also describes state laws that require closure or nonrenewal of failing charter schools and a process by which the state can suspend an authorizer's authority to authorize charter schools where the law is not being followed. See p. e41.

The applicant also describes the outline of a rigorous application process that all authorizers have implemented and a rigorous pre-opening process that increases the chances of success of new charter schools. See p. e42.

Weaknesses:

No information is provided as to what the state is doing or will do with the deficiencies that may be found in the authorizer's annual report other than if the authorizer fails to close a charter school that has been in the lowest category of school improvement for four consecutive years. Even then, it is unclear whether this requirement has been followed and enforced.

Reader's Score: 4

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