

Ohio Charter Schools Program (CSP) Grant: Frequently Asked Questions

Eligibility

- 1. Our school has only been open for a year; however, our sponsor received an overall rating of ineffective on the most recent sponsor evaluation. Are we eligible to apply for an Ohio Charter Schools Program (CSP) grant?**

No, you are not eligible to apply for a CSP grant. Only schools with sponsors that received an overall rating of effective or higher on the most recent sponsor evaluation and meet the other eligibility requirements can apply. For more information, refer to the following sections in the [Request for Application](#): Eligible Applicants, Ineligible Applicants, Multiple Community Schools, Education Service Providers and Lottery and Enrollment Requirements.

- 2. We are developing a school that would open for the first time during fall 2021. Can we apply for a 2019-2020 planning grant?**

No, you are not eligible to apply for a 2019-2020 planning grant. To apply for the 2018-2019 planning grant, schools must be opening for the first time during fall 2020. For more information, refer to the Eligible Applicants section on page 6 in the Request for Application.

- 3. We would like to apply for a planning grant; however, we do not yet have a preliminary agreement with an eligible sponsor. Can we apply?**

No, you are not eligible to apply for a planning grant. To apply, a school must already have a preliminary agreement in place with an eligible sponsor. In addition, the preliminary agreement must have been adopted prior to March 15, 2019 with an intention to open in the fall of 2020. For more information, refer to the Eligible Applicants section on page 6 in the Request for Application. You may also find guidance on developing a community school by [clicking here](#).

- 4. We are a private school that has only been open for one year. Our educational model is very similar to those used in many community schools in Ohio. Are we eligible to apply for the subgrant?**

No. To be eligible for a subgrant, applicants must first meet the federal definition of a public charter school. As private schools are not public, they do not meet the federal definition of a charter school. For more information, refer to the following sections in the [Request for Application](#): Eligible Applicants, Ineligible Applicants, Multiple Community Schools, Education Service Providers and Lottery and Enrollment Requirements.

- 5. We received a CSP grant directly from the U.S. Department of Education last year. Can we still apply for an Ohio CSP subgrant?**

No. Community schools that currently receive or have received in the past a CSP grant from the U.S. Department of Education are not eligible to apply for the Ohio CSP subgrant. For more information, refer to the Eligible Applicants section on page 6 in the Request for Application.

6. Our community school has been open for one year, and our sponsor received an overall rating of effective on its most recent sponsor evaluation. In addition, we are a dropout prevention and recovery school. Are we eligible to apply?

No. Dropout prevention and recovery schools, as well as e-schools, are not eligible to apply for CSP subgrants. Applicants must meet all eligibility requirements, not just one or two of the requirements. For more information, refer to the following sections in the [Request for Application](#): Eligible Applicants, Ineligible Applicants, Multiple Community Schools, Education Service Providers and Lottery and Enrollment Requirements.

7. How does the waiver factor into the eligibility of the governing authority's treasurer?

The CSP Federal Nonregulatory Guidance, on the arm's-length relationship between a governing authority and its education management organization (EMO) or Charter Management Organization, states: "The charter school has an independent attorney, accountant, and audit firm that works for the charter school and not for the for-profit charter management organization or EMO." (B-13 b) A community school governing authority contracting with a for-profit education management organization or for-profit charter management organization must comply with section B-13 of the CSP Federal Nonregulatory Guidance. Since Ohio law permits a waiver, the U.S. Department of Education has confirmed this is permissible as long as the community school's governing authority employs the services of a treasurer through the contracted education management organization or charter management organization, pursuant to Ohio Revised Code 3314.011; the community school approved this in writing; and the community school meets all other eligibility requirements.

8. Which sponsors are considered eligible sponsors for CSP Round 3 applications?

For the third round of Ohio's CSP grant and beyond, sponsors meeting the following criteria will be considered eligible for CSP funding, allowing schools under their oversight to apply for Implementation or Expansion CSP Subgrants (if the school is eligible):

Option 1:

1. Effective or exemplary for three most recent Sponsor Evaluations;
2. A 3 or 4 on all of the Absolute Priority standards (D.02 Enrollment and Financial Reviews, D.03 On-site Visits, D.04 Site Visit Reports, D.05 Performance Monitoring, D.07 Annual Performance Reports, E.01 Renewal Application and E.02 Renewal and Non-Renewal Decisions) or submission of a corrective action plan to Ohio Department of Education staff that would meet the 3-point expectation for the 2018-2019 Sponsor Evaluation.

Option 2:

1. Effective or exemplary on the overall rating for the 2017-2018 Sponsor Evaluation;
2. A 3 or 4 on standards on a majority of Absolute Priority standards (D.02 Enrollment and Financial Reviews, D.03 On-site Visits, D.04 Site Visit Reports, D.05 Performance Monitoring, D.07 Annual Performance Reports, E.01 Renewal Application and E.02 Renewal and Non-Renewal Decisions).
3. Submission of a corrective action plan to Ohio Department of Education staff that would meet the 3-point expectation for the 2018-2019 Sponsor Evaluation (three or less of the above list).

Note: If a Sponsor is effective for only one year but scores a 3 or 4 on all Absolute Priority Standards, they would be eligible for CSP funding.

For more information, refer to the Eligible Applicants section on page 6 in the Request for Application.

9. What are the ineligibility criteria?

Ineligible applicants meet any of the following criteria:

- Dropout prevention and recovery community schools, as defined in Ohio statute ORC 3314.35 (A)(4)(a).
- E-schools, as defined in Ohio statute ORC 3314.02 (A)(7).
- Community schools that received CSP grants directly from the U.S. Department of Education or Ohio subgrants prior to 2015.
- Community schools that are in their third year of operation or more at the time this request for application was issued.
- Community schools under contract with sponsors receiving ratings of ineffective or below on the most recent Sponsor Evaluation ratings.
- Community schools with designated feeder patterns, as their enrollment policies do not align with the federal definition of a community school.
- A community school may not receive more than one grant for planning, implementation, and expansion activities; therefore, the Ohio Department of Education may not award a CSP planning or implementation subgrant to multiple community schools established under a single charter contract and IRN where the community schools are merely extensions of each other (e.g., one community school with multiple campuses). This also is true for community schools established under separate charters if, in fact, they are operated as one community school. The Ohio Department of Education may award CSP planning or implementation subgrants to multiple community schools established under a single charter, or to multiple community schools holding separate charters operating under a single governing board, if each of the community schools meets the federal definition of a charter school and the schools are truly separate and distinct from each other.
- Per the federal nonregulatory CSP guidance, the key factors to be considered by the Ohio Department of Education when determining whether multiple community schools created under a single charter or multiple charters held under a single charter management organization are considered to be separate and distinct include:
 - The terms of the charter;
 - Whether the charter schools were established and are recognized as separate schools under the state's charter school law;
 - Whether the charter schools have separate performance agreements with their authorized public chartering agency(ies);
 - Whether each school separately reports its academic performance for ESEA reporting purposes;
 - Whether the schools have separate facilities;
 - Whether the charter schools have separate staffs; and
 - Whether the charter schools' day-to-day operations are carried out by different administrators.
- Schools choosing to engage a charter management organization or an education management organization must demonstrate they and their governing authorities are independent of the provider and that all fees and agreements are fair and reasonable as outlined in statute. The charter management organization or education management organization does not qualify as an eligible applicant nor may it hold or manage a CSP subgrant awarded to a school.
 - The Ohio Department of Education will require an assurance that the involvement of any Educational Service Provider, whether for-profit or non-profit, remains at arm's-length and has no involvement with the administration of the subgrant.
 - Applicants for the planning or implementation subgrant program will be required to submit a copy of the contract between their governing board and the charter management organization or education management organization, as part of Appendix 10: Disclosure Information and Appendix 12: Charter/Education Management Questionnaire, to verify the arm's-length agreement between the two entities, as

- Students who are eligible to attend and are living in the attendance area of a public school at the time it is converted into a community school;
- Siblings of students already admitted to or attending the same community school;
- Children of a community school's founders, teachers and staff (so long as the total number of students allowed under this exemption constitutes only a small percentage of the school's total enrollment); and
- Children of employees in a work-site community school (so long as the total number of students allowed under this exemption constitutes only a small percentage of the school's total enrollment).
 - **NOTE:** Although Ohio Revised Code 3314.06 allows for other exemptions, these exemptions are not allowed for schools receiving CSP subgrants [20 USC 7221i(1)(H)].
 - The use of weighted lotteries is not permitted by community schools receiving CSP funds.
- The following elements must be addressed in the community school's enrollment policy, which must be submitted in Appendix 1 of the subgrant application:
 - How the community was/will be notified of the community school's opening;
 - The date of the first, and thereafter annual, lottery;
 - The community school's definition of founding family and the percentage of students to be enrolled as children of founding families;
 - The community school's definition of staff and the percentage of students to be enrolled as children of staff members; and
 - The processes and procedures that will guide how the lottery will be conducted, including the procedures for students placed on a wait list.

For more information, refer to the following sections in the [Request for Application](#): Eligible Applicants, Ineligible Applicants, Multiple Community Schools, Education Service Providers and Lottery and Enrollment Requirements.

10. Are “takeover” schools eligible for the implementation grant? Is the grant for new startup schools only?

Only newly-established community schools meeting all eligibility requirements are eligible to apply for the CSP Implementation subgrant. For the purposes of the CSP subgrant competition only, a newly-established school is a school that is under a preliminary agreement with a sponsor to open by the 2020-2021 school year or in its first or second year of operation at the time of the application submission. For more information, refer to the following sections in the [Request for Application](#): Eligible Applicants, Ineligible Applicants, Multiple Community Schools, Education Service Providers and Lottery and Enrollment Requirements.

11. Why were dropout recovery schools omitted from eligibility?

The U.S. Department of Education included this provision as a special condition on Ohio's administration of the CSP grant. For more information, refer to the Ineligible Applicants section on page 6 in the Request for Application.

12. Since only 35 pages are allowed, does the applicant need to include the actual question before answering?

The specific questions do not need to be written again. Each narrative section and appendices need to be clearly identified as outlined in the request for application. The narrative section shall not exceed 35 pages. The 35-page limit does not include the appendices or the competitive preference priorities, as these submissions have a specific page limit outlined in the Request for Application. For more information, refer

to the Application Format section on page 20 of the Request for Application.

13. Is the application single spaced or double spaced?

Either single or double spaced is acceptable for the narrative section, but the section shall not exceed a total of 35 pages. The competitive preference priorities and appendices may be single or double spaced as well, but those sections may not exceed the page limits outlined in the Request for Application. Refer to pages 21 through 77 of the Request for Application for more information on each section of the application.

14. Is the applicant required to complete the Competitive Preference Priorities? May I complete only one of the Competitive Preference Priorities?

No, the applicant does not need to complete the Competitive Preference Priorities. The applicant may choose to respond to any or all the Competitive Preference Priorities. Refer to page 20 and pages 98 through 101 of the Request for Application for more information on the Competitive Preference Priorities.

15. What is your definition of an activity?

An activity is defined as a budget expenditure that aligns with the budget narrative and grid while providing a clear picture of the proposed use of funds. A Project Goals and Activities Form (Appendix 11 of the Request for Application) must be completed for each activity in the budget grid for the subgrant type. For example, if the community school is applying for a planning subgrant, Project Goals and Activities Forms (Appendix 11) must be completed for each expenditure outlined in the budget grid for the planning subgrant allocation. Each Project and Activity Form must include a SMART goal as defined in number 43 of this document. Refer to page 72 of the Request for Application for more information on the Appendix 11: Project Goals and Activity Form.

16. What is the budget narrative?

The budget narrative is to be included as part of the Application Narrative Section B and must provide a detailed explanation of each budget cell in the budget grid entered into the CCIP. Refer to pages 44 and 45 of the Request for Application for more information on the budget and budget narrative, including project goals and evaluation methods.

17. What is the needs assessment for professional development? Can you expand more on the expectations on this requirement?

A needs assessment typically includes the use of multiple forms of data to triangulate a theory of action and determine how your professional development plan addresses your identified needs to promote and sustain high-quality instructional delivery and improved student academic achievement. A needs assessment identifies strengths and areas for improvement between the current condition and the conditions (skills, knowledge level, etc.) necessary to successfully implement the education plan.

Expansion Eligibility

18. For Expansion, one of the options for eligibility is to add three or more educational program(s) or courses in a core academic subject area beyond the original education plan. Do all of the courses have to be in the same subject in order to be eligible for Expansion?

The purpose of CSP Expansion subgrant funding is to significantly increase the enrollment or add one or more grades to high-quality community schools [ESEA 4310 (7)]. Adding additional programming in core academic subject areas for the first time can help a high-quality community school increase enrollment by offering subjects currently not offered in the local community. The courses and/or programs do not have to be in the same subject; however, in order to be eligible for CSP, applicants must demonstrate how adding

additional programs or courses will result in an increase in enrollment. An example could be adding career-technical education programming in grades 7-8 as a means to increase overall enrollment since there are no career-technical education options available in the local community at those grade levels.

19. For Expansion, do the new courses need to be added in the first or second year of Expansion subgrant funding?

In order to meet the eligibility requirement for the CSP Expansion subgrant, the three or more new educational program(s) or courses in a core academic subject area beyond the original school performance education plan must be added by the start of the 2019-2020 academic year. Since the purpose of CSP Expansion is to increase the enrollment of students in high-quality charter schools, the programming intended to be supported with CSP funding must be in place at the beginning of the award period.

Use of Funds

20. What types of purchases or expenses can be made with CSP subgrant funding?

The CSP subgrant can only be used for the following purposes:

Planning and Program Design

- Post-award planning and design of the educational program, including refinement of the desired educational results and methods for measuring progress toward achieving those results;
- Development and implementation of plans and systems to increase student academic proficiency rates, close achievement gaps and increase high school graduation rates;
- Professional development of teachers and other staff who will work in the community school.

Initial Implementation of the Community School

- Informing the community about the school;
- Acquiring necessary equipment and educational materials and supplies;
- Acquiring or developing curriculum materials; and
- Other initial operational costs that cannot be met from state or local sources, including but not limited to:
 - a. Costs associated with creating and implementing office functions, such as accounting systems, attendance and registration systems, and human resources policies;
 - b. Costs associated with the installation of computers, data systems, networks, and telephones;
 - c. Personnel expenses incurred either before or after the school's opening, provided these expenses are associated with initial implementation activities (i.e., as opposed to ongoing operations), such as program and curriculum development and integration and teacher and staff recruiting. (**NOTE:** If personnel split their time between ongoing operational activities and initial implementation activities, only that portion of the time associated with initial implementation of the community school is allowable as an initial operational cost. The community school must maintain accurate time and effort records to document the amount of time each employee works on tasks related to the initial implementation of the community school); and
 - d. Rental or occupancy costs for the school facility for a reasonable period of time in preparation for the school's opening (implementation only).

Initial Expansion of Community School

- Informing the community about the expansion;
- Acquiring necessary equipment and educational materials and supplies;
- Acquiring or developing curriculum materials for expansion programs and/or courses;
- Other initial operational costs that cannot be met from state or local sources, including but not limited to:
 - a. Costs associated with office functions related to the facility expansion, such as accounting systems, attendance and registration systems, and human resources policies;

- b. Costs associated with the installation of computers, data systems, networks, and telephones;
- c. Personnel expenses incurred during expansion provided that these expenses are associated with initial expansion activities (i.e., as opposed to ongoing operations), such as program and curriculum development and integration and teacher and staff recruiting. (**NOTE:** If personnel split their time between ongoing operational activities and initial expansion activities, only that portion of the time associated with initial expansion of the community school is allowable as an initial operational cost. The community school must maintain accurate time and effort records to document the amount of time each employee works on tasks related to the initial expansion of the community school); and
- d. Rental or occupancy costs for the school facility for a reasonable period of time in preparation for the school's expansion.

NOTE: All of the expenses described in (a)-(d) are allowable under the CSP only to the extent they are related to the initial implementation or expansion of the community school and cannot be met from state or local sources and are not an expense referenced in the unauthorized activities section. A CSP subgrantee must demonstrate that state or local funds are unavailable to cover the expense at issue. If the community school can show that the state or local funds it has received are necessary to meet expenses other than the one at issue, then the community school has met its burden of showing that the other initial operational costs cannot be met from state or local sources and, therefore, is allowable under the CSP grant [20 U.S.C. 7221c(f)(3)(B)(iv)].

Please review the CSP [Allowable Cost Guide](#) for Implementation and the [CSP Allowable Cost Guide](#) for Expansion for a complete breakdown of allowable and unallowable items.

21. Are there any restrictions on what can be purchased with the CSP subgrant?

The following items cannot be funded and should not be requested:

- Capital expenses, such as acquisition of a facility renovation, technology leases, elevators, water main valves, permanent fixture of equipment/furniture, and installation of playground and/or fitness equipment (rental or occupancy costs will be considered for a reasonable period of time before the school opens);
- Acquisition of any vehicle;
- Construction and any related construction activities, such as architectural renderings and engineering activities;
- Recurring operational expenses to include administrative and programmatic activities, such as utilities, teaching, administrator salaries (allowable under certain circumstances), professional dues or memberships, and transportation of students;
- Indirect costs;
- Costs for student expeditions/field trips, travel, etc.;
- Employee hiring/recruitment expenses, such as a placement firm or travel for prospective employees (small amounts for advertising are fine);
- Non-educational, non-informative promotional/novelty items for advertising, events, or recruiting;
- Grant oversight expenses (all grant oversight should be done on-site by an employee of the community school);
- Gift certificates, food or alcoholic beverages, and school apparel for staff or students;
- Fines and penalties or lobbying expenses;
- Program expenses outside the school's charter contract, (i.e., before-/after-school programs);
- Costs associated with the initial licensure or renewal of teacher licensure (including costs of continuing education credits for professional development coursework completed at a college or university);
- Out-of-state travel, unless it can be demonstrated that the goal of the travel cannot be accomplished in-state (no out-of-country travel is permitted); and

- Expenditures that are not “allowable, allocable, or reasonable” as defined in the Nonregulatory Guidance Handbook, dated January 2014, and the Uniform Guidance [2 CFR 200].

Please review the CSP [Allowable Cost Guide](#) for Implementation and the [CSP Allowable Cost Guide](#) for Expansion for a complete breakdown of allowable and unallowable items.

22. We currently do not have anyone on our school board with grant writing experience. If we hire a professional grant writer to help us write our subgrant application, can we be reimbursed for those costs?

No, subgrant funds may only be used for post-award planning and design of the educational program and/or initial implementation of the community school. Any costs incurred prior to the subgrant award are not reimbursable.

23. We want to use the subgrant to help supplement our annual teacher salary funding. Can we do that?

No, recurring operational expenses, such as teacher and administrator salaries, are considered as unauthorized activities for subgrant purposes and cannot be funded using subgrant awards. Please refer to the Request for Application for other examples of unauthorized activities.

NOTE: The subgrant does allow for some personnel expenses incurred either before or after the school's opening, provided that the expenses are associated with initial implementation activities and are not ongoing operational expenses.

24. We would like to use subgrant funding to start an after-school tutoring program for our students. Is this allowable?

No, it is prohibited to use subgrant funds for program expenses outside of the school's charter contract, such as before- and after-school programs. In addition, tutoring is considered as an ongoing operational cost and therefore cannot be funded with the subgrant.

25. During the implementation stage, is facility rent (February-June) before initial opening that fall allowable?

See pages 11 through 13 of the Request for Application regarding use of funds and Section D of the CSP Federal Nonregulatory Guidance, dated January 2014.

For the purposes of Ohio's CSP subgrant, facility rental fees are not an allowable expenditure for a planning subgrant. Limited facility rental fees are allowable costs during the Implementation Year 1 only from the date of award to the start date of school.

26. Is technology an allowable expenditure in the planning subgrant?

Technology may be an allowable expenditure in the planning subgrant if it meets the following purpose:

- Post-award planning and design of the educational program, including refinement of the desired educational results and the methods for measuring progress toward achieving those results;
- Development and implementation of plans and systems to increase student academic proficiency rates, close achievement gaps, and increase high school graduation rates;
- Professional development of teachers and other staff who will work in the community school.

A justification for the budgeted amount must be included in the budget narrative and the Project Goals and Activity Form in order to be considered. A technology plan (Appendix 5) must be included with the application if the applicant requests funds for technology.

Please note that not all costs are allowable expenses. If awarded a subgrant (Planning or Implementation

Year 1 or Year 2), all expenditures are subject to audit. Planning subgrant recipients must be able to document how each expenditure is directly related to development or refinement of the educational program, development and implementation of plans and systems to improve student achievement and professional development for teachers and other staff working in the community school.

For more information, refer to pages 11 through 13 for Use of Funds in the Request for Application. The Ohio Department of Education is developing examples of allowable and unauthorized expenditures and will post this information on the Charter Schools Program grant webpage.

27. Are board development or attorney fees allowable expenditures?

Board development and attorney fees are not allowable expenditures. For more information, refer to pages 13 through 14 for Use of Funds in the Request for Application. Please review the CSP [Allowable Cost Guide](#) for a complete breakdown of allowable and unallowable items.

28. Are consumables, such as paper, pencils, markers, Post-it notes, etc., allowable expenditures during the planning subgrant?

Consumables, such as paper, pencils, markers or Post-it notes, may be allowable expenditures if they meet the following purpose:

- Post-award planning and design of the educational program, including refinement of the desired educational results and methods for measuring progress toward achieving those results;
- Development and implementation of plans and systems to increase student academic proficiency rates, close achievement gaps, and increase high school graduation rates;
- Professional development for teachers and other staff who will work in the community school.

A justification for the budgeted amount must be included in the budget narrative and the Project Activity Form in order to be considered. Please note that not all costs are allowable expenses.

If awarded a subgrant (Planning or Implementation Year 1 or Year 2), all expenditures are subject to an audit. Planning subgrant recipients must be able to document how each expenditure is directly related to development or refinement of the educational program, development and implementation of plans and systems to improve student achievement and professional development for teachers and other staff working in the community school.

For more information, refer to pages 13 through 14 for Use of Funds in the Request for Application.

29. Can you ask for reimbursement for a paid expense if the activity will not occur until after the expense is paid but during the fiscal year before June 30? For example, you pay for a marketing event on Sept. 1 to occur on Feb. 1 of the fiscal year.

For more information, refer to Section D-2 and D-3 [D-2 and D-3 in the CSP Federal Nonregulatory Guidance](#), dated January 2014, regarding allowable expenditures.

General Questions

30. What types of subgrants are available?

There are three types of subgrants available under Implementation:

1. One-year planning subgrants: Up to \$100,000 for community schools that have not yet opened and do not plan to open until fall 2020 to help with the planning and design of the educational model.
2. Year 1 implementation subgrants: Up to \$350,000 for community schools that are ready to open for the first time during fall 2019.
3. Year 2 implementation subgrants: Up to \$250,000 for community schools that opened for the first time during fall 2018.

There are two types of subgrants available under Expansion:

1. Year 1 expansion subgrants: Up to \$350,000 for high-quality community schools looking to expand with the purpose of increasing overall enrollment.
2. Year 2 expansion subgrants: Up to \$250,000 for high-quality community schools looking to continue expansion efforts with the purpose of increasing overall enrollment.

For more information, refer to the Duration and Types of Subgrants section on pages 11 and 12 of the Request for Application.

31. Do schools applying for a CSP Implementation grant have to replicate a high-performing school model?

While grant applicants are not required to replicate a high-performing school model, they are required to be planning or implementing a high-performing, site-based general education community school. For more information, refer to pages 4 through 7 in the Request for Application under Eligible Applicants or [click here](#) to access the high-performing list for Round 2 of the CSP subgrant competition.

32. Sometimes the CSP grant is referred to as a grant and sometimes as a subgrant. What's the difference?

The CSP grant is the federal funding that the U.S. Department of Education awarded to the Ohio Department of Education. The CSP subgrant is the means through which the Ohio Department of Education will award federal funding from the CSP grant to schools whose applications are approved. Sometimes the terms are used interchangeably, but technically, a subgrant refers to the federal funding award that a school receives from the Ohio Department of Education.

33. If our school gets awarded a CSP subgrant, how does the funding get distributed?

Subgrant funds will be distributed on a reimbursement basis only. Schools will be required to submit project cash requests (PCRs) with all supporting documentation of expenditures to the Ohio Department of Education no more than twice a month — the 15th and last day of each month — with reimbursement occurring once a month. For more information, refer to Project Cash Requests section on page 17 of the Request for Application.

34. Our charter management organization takes care of everything at our school, from supplying staff to writing our annual budget. If we are awarded a CSP subgrant, can our charter management organization manage it?

No. The program prohibits the administration of CSP subgrants by a charter management organization or education management organization. The governing authority of the community school is responsible for administering all aspects of the CSP subgrant, including the budget. If it is determined that the charter management organization or education management organization is administering the CSP subgrant in any capacity, it will be grounds for grant termination and, depending on the specific situation, the Ohio Department of Education may seek recovery of funding. For more information, refer to pages 7, 8 and 66 in the Request for Application.

35. How does the governing authority administer the grant?

The following factors are some key indicators regarding the administration of the CSP subgrant:

- A direct representative of the applicant community school, independent of the charter management organization or education management organization, administers the CSP grant, such as the governing authority's treasurer who is independent of the education management organization or charter management organization.
- The contract between the governing authority and the education management organization or charter management organization must have a termination clause as supporting evidence of an arm's-length

relationship.

- The CSP federal nonregulatory guidance provides information pertaining to the compliance with the arm's-length relationship.
- The community school has an independent attorney, accountant and audit firm that works for the community school and not for the charter management organization or education management organization.
- The governing authority must officially administer the grant. The grant funds must be deposited in a bank account owned by the school and may not be routed directly from there to the education management organization or charter management organization. The school's governing authority should be making the bill payments.
- The governing authority must approve and sign all contracts and review purchase orders and payments using any CSP funding.
- The governing authority may not relinquish or delegate its authority to administer the grant to a contracted vendor or service provider. The governing authority is ultimately responsible for ensuring that all conditions of the grant are met.

For more information, refer to pages 8, 9, 74 and 75 in the Request for Application and section B-13 of the CSP Federal Nonregulatory Guidance, dated January 2014.

36. Are large furniture purchases that need to take place before July 1 in an effort to be ready for the first day of school an allowable expense? Are other invoices dated before July 1 allowable?

The obligation of funds must occur during the budget period. Per 2 CFR 200.71 (Obligations): When used in connection with a non-federal entity's utilization of funds under a federal award, obligations means orders placed for property and services, contracts and subawards made and similar transactions during a given period that require payment by the non-federal entity during the same or a future period.

37. How are you classifying educationally disadvantaged students? Do LEP students fall under this category?

The Elementary and Secondary Education Act and Every Student Succeeds Act identifies subgroups; however, not all identified subgroups are educationally disadvantaged. Academically poor-performing students or students whose academic performance consistently lags behind that of all students, for the purposes of the CSP subgrant competition, meet the definition of educationally disadvantaged.

38. Can a school apply for a Year 1 and Year 2 subgrant simultaneously, or does the school wait until after the Year 1 to apply for Year 2?

Governing authorities of eligible community schools may not apply for an Implementation Year 1 and Implementation Year 2 simultaneously. If awarded a Year 1 Implementation subgrant, the governing authority must complete a renewal application if the community school has made substantial progress as required under the grant. The Ohio Department of Education makes this determination.

Application Questions

39. When can CSP subgrant applications be submitted?

The CSP subgrant application period is April 22-May 24, 2019. All applications must be submitted by 4:59 pm on May 24. For more information, refer to page 21 of the Request for Application for the proposed timeline.

40. How and where do I submit my completed CSP subgrant application?

Subgrant applicants are required to submit a completed PDF copy of the application packet through the Ohio Department of Education's online e-grant system, the Comprehensive Continuous Improvement Plan

(CCIP). Through CCIP, applicants will complete the required budget form, as well as upload PDF versions of all required forms, the narrative and all required appendices. For more information, refer to the Application Submission section on page 19 of the Request for Application.

41. Do I need any special permissions or log-ins to submit my application through CCIP?

CSP subgrant applicants must have a OH|ID, IRN (unique school identifying number) and designated roles in the Ohio Educational Directory System (OEDS) to access the CCIP. The following technical assistance will aid the applicant in obtaining the access needed to enter the CCIP:

- The Ohio Department of Education recently transitioned from the SAFE portal to the OH|ID Portal. To assist users with accessing the new portal or to create access, please [click here](#).
- Don't know if your organization has an IRN? Look it up by [clicking here](#). If your organization does not have an existing IRN, [click here](#) for an application form and instructions.
- To establish a new organization in OEDS, please [click here](#).
- To assign roles in OEDS, please [click here](#). Please make sure members of your organization are assigned the roles "Data Entry Funding-CCIP," "CCIP Fiscal Representative" and "CCIP Authorized Representative."

The following links will assist the applicant with navigation and completing the application process in the CCIP after the applicant has a OH|ID account:

- To Access the CCIP, [click here](#).
- For CCIP technical assistance videos, sign in to your OH|ID account and [click here](#).
- For guidance on CCIP navigation, sign in to your OH|ID account and [click here](#).

For more information, refer to the Application Submission section on page 22 of the Request for Application.

42. What is required to be included in the CSP subgrant application?

The CSP subgrant application is made up of three components:

- Required Forms
 - Cover page;
 - Application submission checklist;
 - Certification page;
 - Governing authority signed resolution;
 - Statement of assurances;
 - Sponsor statement of assurances; and
 - Project goals budget spreadsheet.
- Application Narrative (maximum total of 35 pages for new applicants)
 - Executive Summary (2 pages);
 - Subgrant Project Goals, Budget, Budget Narrative, and Evaluation Methods;
 - School Community;
 - Educationally Disadvantaged Students;
 - Educational Model;
 - School Goals;
 - Outreach and Engagement;
 - School Personnel and External Support;
 - Governance and Management Plan;
 - Business Capacity and Continued Operation; and
 - Competitive Preference Priorities (Optional).

- Application Appendices (see specific appendix for page limits)
 - Community School Enrollment Policy, including Lottery Protocol (required of all applicants);
 - Completed CSP Budget Form (required of all applicants, to be completed in the CCIP, Ohio's e-grant system);
 - Copy of Community School's Annual and Long-term Budgets and Last Audited Financial Statement (required of all applicants);
 - Copy of Preliminary Agreement or Executed Contract (required of all applicants);
 - Technology Plan (if requesting funds for technology);
 - School Library Development Plan (if requesting funds for library);
 - Professional Development Plan (required if requesting funds for professional development);
 - Marketing Plan (required of all applicants);
 - Performance Management Plan (required of all applicants);
 - Disclosure Information (required of all applicants);
 - Copy of Lease Agreement (if applicable);
 - Charter Management Organization or Education Management Organization Contract or Other Provider Contracts (if applicable);
 - Conflicts of Interest Policy (required of all applicants);
 - Renovation/Repair (if requesting funds for renovation/repairs);
 - Resolution of Governing Authority identifying Area of Expansion (expansion only);
 - Sponsor Statement of Support of Expansion Efforts;
 - CSP Subgrant Goals and Activities Form (required of all applicants);
 - Charter/Education Management Organization Questionnaire (required of all applicants); and
 - Waivers (Optional).

For more information, refer to pages 23 and 24 of the Request for Application.

43. The Request for Application for the CSP subgrant is quite intensive. What happens if I forget to submit a required part of the application?

Applications that are missing a required form, narrative section or appendix will not be scored. Applicants must make sure they include all required information and documentation with the submitted application. For more information, refer to page 19 of the Request for Application.

44. Are applicants required to complete all narrative sections and appendices?

The CSP subgrant application has 11 narrative sections and 13 appendices. Ten of the narrative sections, Sections A – J, are required for all applicants. The final narrative section, K - Competitive Preference Priorities, is optional and may result in application bonus points depending on the application review. Nine of the 12 appendices are required for all applicants. Appendices 5 – 7 are also required if applicants are requiring subgrant funding to use for technology, school library development or professional development, respectively. For more information, refer to pages 37 through 68 of the Request for Application on the application narratives and appendices.

45. Our community school does not use a charter management organization or education management organization. Are we still required to complete the Charter Management Organization/Education Management Organization Questionnaire (Appendix 12)?

Yes. The Charter Management Organization/Education Management Organization Questionnaire is required of all applicants. If your school does not use a charter management organization or education management organization and does not plan to use either one, enter "N/A" in the Legal Name of charter management organization/education management organization line of the questionnaire and have the president of the school's governing authority sign and date the form. Although not applicable for applications that do not have to answer the questions, it is required to submit the form as part of the application packet. For more information, refer to page 66 of the Request for Application.

46. SMART goals are mentioned several times throughout the RFA. What is a SMART goal?

“SMART” is an acronym that refers to the following:

S = Specific: Easy to understand, specifies desired results, uses concrete action verbs (i.e., increase, solve, etc.) defines the goal by answering who, what, when, why and how.

M = Measurable: Describe how each goal (result) will be measured. Can the goal be measured using numbers (quantitative)? Decide what measure will indicate “success.” How will you know if you have accomplished the goal?

A = Attainable: Does the community school have the necessary tools or resources to accomplish this goal? Is the goal within the community school’s control?

R = Relevant: Is the goal in alignment with the mission, vision and guiding principles of the community school?

T = Time-Bound: What is the specific timeframe to achieve this goal (beginning and end date), is the timeframe reasonable and does it include interim steps (benchmarks) and a plan to monitor progress?

The use of SMART goals helps to ensure that subgrant applicants carefully consider all facets of what they hope to carry out with the subgrant funding, making sure that school goals are realistic and attainable within a specified time frame.

A needs assessment typically occurs prior to the development of SMART goals. An assessment includes the use of multiple forms of data to triangulate a theory of action and determine how your action plan addresses your identified needs to promote and sustain high-quality instructional delivery and improved student academic achievement. It also identifies strengths and areas for improvement between the current condition and the conditions (skills, knowledge level, etc.) necessary to successfully implement the education plan.

For more information, refer to pages 24 through 25 of the Request for Application.

47. Do the community school assurances and the certification have to be accompanied by a governing authority signed resolution?

Yes, the community school assurances and the certification must be accompanied by a governing authority signed resolution. Refer to pages 31 through 35 of the Request for Application.

48. How does an existing school replicate a high performing model?

The following performance measures are used in the identification of a high-performing community school model for the purposes of the Ohio’s CSP grant:

A general education school demonstrates at least one of the following three criteria:

1. Value-Added grade¹ of A or B and
 - Performance Index grade² of A, B, or C, or
 - An increase in Performance Index score in each of the last three years; OR
2. Four-Year Graduation Rate grade of A or B and
 - A Performance Index grade of A, B, or C, or
 - An increase in Performance Index score in each of the last three years; OR

¹ The overall Value-Added measure of the report card looks closely at the growth that all students are making based on past performance.

² The Performance Index measures the achievement of every student on state achievement assessments, not just whether the student reaches “proficient.” Schools receive points for every student’s level of achievement.

3. K-3 Literacy Improvement grade of A or B if no other graded report card measures are available.

The applicant must state that it plans to execute a high-performing model using the measures and metrics outlined above. For more information, refer to pages 5 and 6 of the Request for Application.

49. For existing schools, do you want current year internal data (NWEA) or last year's official report card?

- For community schools planning to open in 2019-2020 and 2020-2021, report card data from existing public schools in the territory for which the community school will be located should be represented in the application.
- For community schools in the first year of operation at the time of this application submission, the community school must provide local assessment data for its schools, as well as report card data from existing public schools in the territory for which the community school is located.
- For community schools in the second year of operation at the time of this application submission, the community school must provide all report card data and local assessment data for its school and report card data from existing public schools in the territory for which the community school is located.

50. What are the definitions of a newly established vs. a replicator school?

For the purposes of the CSP subgrant competition only, a newly established school is a school that is under a preliminary agreement with a sponsor to open by the 2019-2020 school year or a school in its first or second year of operation at the time of the application submission.

51. Describe each role each year of the subgrant. Do we list only new roles added each year or all roles every year?

The roles must be outlined for each year of the subgrant beginning with the first year of the subgrant.

52. Under the Executive Summary section, how do we describe the location if we do not have a location yet? We are beginning school fall 2020.

If the governing authority of a community school that has a preliminary agreement with an eligible sponsor is applying for a planning grant and has not yet identified the facility for the school, the applicant must describe the community and neighborhood that the community school will be located, while also describing the type of facility that would align with the educational model outlined in the application.

53. Ohio CSP Subgrant Application Statement of Sponsor Assurances asks sponsors to describe how the sponsor will provide for the continued operation of the school once the federal CSP grant has expired, if such sponsor determines that the school has met its objectives. Can you provide details on what specific expectations are of the sponsor in this circumstance?

ESEA Section 5203 Applications requires "a description of how the authorized public chartering agency will provide for continued operation of the school once the Federal grant has expired, if such agency determines that the school has met the objectives described in subparagraph (C)(i)." As such, the Ohio Department of Education's Request for Application requires the sponsor to provide this information in the Sponsor Assurances document, which must be submitted as part of the application. The sponsor should explain how it will continue to support the school beyond the duration of the CSP grant, if the community school has met the objectives of the grant and the conditions outlined in its contract between the sponsor and the governing authority.