

Ohio Department of Education

Charter Schools Program

Monitoring Report

Final Report

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This document includes all indicators that were used for the 2016-17 State Educational Agency (SEA) monitoring activities. These indicators were developed under the Elementary and Secondary Education Act (ESEA), as amended by No Child Left Behind Act (NCLB) (20 USC 7221-7221i). This version of the protocol has been updated based on the Nationwide Assessment of Charter and Education Management Organizations Final Audit Report, ED-OIG/A02M0012, September 2016.

For fiscal year 2017 and thereafter, ESEA has been amended by the Every Student Succeeds Act (ESSA), (20USC 7221-7221i). In fiscal year 2018, the indicators contained herein will be updated to reflect the ESSA language and in accordance with Charter Schools Program (CSP) priorities for monitoring of fiscal year 2017 and subsequent SE grantees.

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I. INTRODUCTION

Monitoring is the regular and systematic examination of a grantee’s administration and implementation of a Federal education grant, contract, or cooperative agreement administered by the U.S. Department of Education (ED). Monitoring the use of Federal funds has long been an essential function of ED. ED monitors programs under the general administrative authority of the U.S. Department of Education Organization Act. Section 80.40(e) of Education Department General Administrative Regulations (EDGAR) also permits ED to make site visits as warranted by program needs.

ED policy requires every program office overseeing discretionary or formula grant programs to prepare a monitoring plan for each of its programs. The plans are designed to link established monitoring to achieving program goals and objectives; adhering to laws, regulations, and assurances governing the program; and conforming to the approved application and other relevant documents. Each Principal Office monitors (1) for results; (2) to ensure compliance with the law; and (3) to protect against waste, fraud, and abuse.

The purpose of the Charter Schools Program (CSP) Monitoring Plan is to assess the extent to which grantees are implementing their approved grant projects in compliance with Title V, Part B Public Charter Schools Program statutes, regulations, and guidance. The CSP monitoring objectives are threefold:

- Increase CSP fiscal and programmatic accountability at State and local levels
- Support and improve grantee capacity in carrying out the purpose of the CSP through the timely and efficient administration of Federal funds awarded under this program and other Federal education programs
- Assist grantees with the planning and implementation of high-quality charter schools

Thus, monitoring serves not only as a means for helping grantees achieve high-quality implementation of their CSP grant project, it also helps ED to be a better advisor and partner in that effort. CSP monitoring efforts are designed to focus on the results of grantees’ efforts to implement critical requirements of the CSP using available resources and guidance. Information and data from grantee monitoring also assist to inform the program’s performance indicators under the Government Performance Results Act.

The following report uses data collected as part of the December 2017 monitoring visit to document the status and progress the Ohio Department of Education (ODE) has made in implementing grant objectives. Findings in this report update those from the October 2017 monitoring report (based on data from the March 2017 site visit) and reflect the ODE’s compliance and performance under the CSP grant from the beginning of the current grant period to the time of the December 2017 site visit.

II. BACKGROUND INFORMATION ON GRANTEE

CHARTER CONTEXT, STRUCTURE, AND SIZE

BASIC CHARTER PROVISIONS

The Ohio General Assembly passed House Bill 215 in June 1997 establishing a pilot community school program in Lucas County. Community schools¹, which are charter schools in Ohio, can be sponsored by school districts, joint vocational districts, educational service centers, public universities, qualified nonprofits, and the ODE. Although conversion schools are allowed throughout the state, new start-ups are limited to challenged districts, including the eight largest urban districts. Community schools, whether start-ups or conversion schools, act as their own LEA.

Effective January 1, 2015, a new sponsor evaluation framework went into effect that rated sponsors annually on three components: the academic performance of students enrolled in schools under their sponsorship, adherence to quality practices, and compliance with applicable laws and rules. The Ohio Department of Education suspended the Sponsor Performance Review, also called the Authorizer Quality Performance Review (AQPR), in July 2015 and rescinded the ratings of the seven evaluations that had been completed at that point. Evaluation of the remaining 58 sponsors that were in process was suspended. The ODE had learned that the initial ratings had omitted the academic performance of eSchools, as well as dropout prevention and recovery schools. The ratings also included schools that Ohio law excluded. As a result, an Independent Advisory Panel was appointed to make recommendations to improve the sponsor evaluation process and House Bill 2 (HB2) was passed which revised the sponsor evaluation system including the sponsor ratings. The sponsor evaluation process resumed in February 2016 following the effective date of HB2. New ratings were released in October 2016 for the 2014-2015 and 2015-2016 school years and in November 2017 for the 2016-17 school year. See below for additional detail regarding HB2.

State Charter Law Summary	
Basic Components	Statute Summary
Charter Types	New start-ups and traditional public school conversions are allowed.
Authorizer Types (e.g., SEA, LEA, IHE, non-profit)	Multiple authorized public chartering agencies are allowed, including LEAs, IHEs, non-profit organizations, educational service centers, and the Ohio Department of Education.
LEA Status (e.g., own LEA or part of traditional LEA)	Ohio law allows charter schools to act as their own LEA.
Charter Caps	State statute law allows conversion charter schools in all districts but limits start-up charter schools to “challenged” districts, including the eight largest urban school districts in the state. Ohio law allows five new eSchools per year and limits enrollment increases to no more than 25% per year above base

¹ Charter schools are known as community schools in Ohio and authorizers are known as sponsors. The terms are used interchangeably throughout the report.

enrollment for eSchools with fewer than 3,000 students and no more than 15% per year for eSchools with greater than 3,000 students.

Other

Charter schools may serve general education or dropout prevention and recovery programs and may provide instruction at site-based schools or eSchools, as virtual schools are called in Ohio.²

LAW/POLICY CHANGES SINCE GRANT APPLICATION

In October 2015, the Ohio legislature passed House Bill 2 (HB2), a charter reform law which significantly increased the transparency, accountability, and responsibility for sponsors, community schools, governing boards, and operators in Ohio. Among other things, the new law strengthened the SEA oversight of sponsors, encouraged quality authorizer practices, put limitations on low-performing community schools’ ability to change sponsors, increased independence and transparency of governing boards, and increased operator transparency. For a full review of HB2, see the Ohio Department of Education’s Community School Legislative History at <http://education.ohio.gov/getattachment/Topics/Community-Schools/Annual-Reports-on-Ohio-Community-Schools/Community-School-LegisHistory.pdf.aspx>.

Updated Law/Policy	Effective Date (Year or Pending)
HB2 required all sponsors, with the exception of two grandfathered sponsors, to enter into a contract with the ODE to sponsor schools by July 1, 2017, established a sponsor-ODE contract renewal process, required sponsors to annually report the amount and type of expenditure made in providing oversight and technical assistance, and prohibited the sponsor of a community school from selling goods or services to that school for a profit.	February 1, 2016
HB2 clarified the procedures of the sponsor evaluation system, established a new rating of “Poor,” outlined incentives for “Exemplary” sponsors, and imposed sanctions for “Ineffective” and “Poor” sponsors.	February 1, 2016
HB2 prohibited school district employees from serving on the board of any community school sponsored by the district; required boards to employ an independent attorney for negotiations of the school’s contract with the sponsor or operator; required criminal background checks, annual disclosure statements, disclosure of board members on school websites, and annual trainings on public-records and open meeting laws; and reduced the maximum governing board member compensation to match compensation of district boards.	February 1, 2016
HB2 required new or renewed contracts between the governing board of a community school and an operator contain certain criteria, including a stipulation of which entity owns the facilities and property and provides that all personal property belongs to the school; the development and publishing of an annual performance report for operators; management companies that receive more than 20 percent of the gross annual revenue of a community school to provide a detailed accounting including the nature and costs of the goods and services it provides to the school.	February 1, 2016

² At the time of both site visits, dropout prevention and recovery schools as well as eSchools were not eligible to apply for CSP subgrants.

The Office of Community Schools (OCS) is led by a Director who oversees the operations of the office, including the sponsor evaluation process. There is a separate office within the Department, the Office of School Sponsorship, that authorizes and directly sponsors 31 community schools. At the time of the site visit the OCS Director, who serves as the Project Director for CSP, reported directly to the Senior Executive Director of the Center for Student Support and Education Options who reports to the Deputy State Superintendent. Fully staffed, the Office of Community Schools includes 10 individuals: The Director; the Grants Manager, six Education Program Specialists; one Management Analyst; and one Administrative Assistant. In addition, two other staff members joined the OCS team to assist with development of CSP materials (e.g., the request for proposals, request for reviewers, communications planning) and implementation of the CSP grant, one working under the Senior Executive Director of the Center for Student Support and Education Options and one under the Senior Executive Director of the Center for Accountability and Continuous Improvement. At the time of both site visits, all ODE staff contributing to the CSP grant were funded in-kind through the State.

CHARTER SCHOOL SECTOR

As of January 2018, 340 charter schools were operating in the state. Community schools in Ohio are clustered around the state’s eight largest urban school districts (Akron, Canton, Cincinnati, Cleveland, Columbus, Dayton, Toledo, and Youngstown) and in Lorain County.

Charter School Sector Highlights			
Major Metropolitan Areas	FY17 Sponsors	FY17 Schools	Context Notes (i.e., sponsor ratings)
Akron (Summit County)	7	19	6 Effective sponsors, 1 Poor sponsor
Canton (Stark County)	5	8	5 Effective sponsors
Cincinnati (Hamilton County)	8	21	6 Effective sponsors, 2 Ineffective sponsors
Cleveland (Cuyahoga County)	11	82	9 Effective sponsors, 2 Ineffective sponsors
Columbus (Franklin County)	10	74	10 Effective sponsors
Dayton (Montgomery County)	11	30	8 Effective sponsors, 2 Ineffective sponsors, 1 Poor sponsor
Lorain (Lorain County)	4	9	4 Effective sponsors
Toledo (Lucas County)	9	36	8 Effective sponsors, 1 Ineffective sponsor
Youngstown (Mahoning County)	6	11	5 Effective sponsors, 1 Ineffective sponsor

Since 2000, 260 charter schools have closed in Ohio. Slightly more than half of the schools (136 schools) closed voluntarily. Another 30 percent were ordered to close by the authorizer. Twenty-four were closed as a result of Ohio’s automatic closure law and the rest were not renewed.

Charter School Closures		
Year	Number of Schools Closed	Reasons for Closure
2000	3	Financial viability; contractual non-compliance; other contractual issues
2001	7	Financial viability; academic viability; contractual non-compliance; academic non-compliance; other contractual issues; merged with another community school
2002	1	Financial viability; contractual non-compliance; other contractual issues
2003	1	Financial viability
2004	5	Financial viability; contractual non-compliance; other contractual issues; academic performance; other good cause
2005	7	Financial viability; contractual non-compliance; other contractual issues
2006	18	Financial viability; contractual non-compliance; other contractual issues; poor financial performance; no longer met founding need; merged with/converted to a traditional public school; non-renewed; other good cause
2007	8	Financial viability; contractual non-compliance; other contractual non-compliance; merged with another community school
2008	14	Financial viability; contractual non-compliance; other contractual issues; no longer met founding need; other contractual non-compliance; merged with/converted to a traditional public school
2009	20	Financial viability; academic viability; contractual non-compliance; other contractual issues; no longer met founding need; other contractual non-compliance; unable to find a new facility; closed by operation of law due to poor academic performance; contract expired
2010	25	Financial viability; academic performance; contractual non-compliance; no longer met founding need; closed by operation of law due to poor academic performance and financial viability
2011	10	Financial viability; contractual non-compliance; other contractual issues; no longer met founding need; closed by operation of law due to poor academic performance; sponsor unable to renew; school was not audited; unable to find a new sponsor; closed by sponsor
2012	16	Financial viability; contractual non-compliance; no longer met founding need; unable to find a new facility; closed by operation of law due to poor academic performance and financial viability
2013	19	Financial viability; contractual non-compliance; no longer met founding need; poor academic and financial performance; closed by operation of law due to poor academic performance; suspended contract, failed to remedy; non-renewed due to low enrollment; school converted to a STEM school; closed by governing authority-sponsor approved; failed to constitute a governing authority
2014	27	Financial viability; contractual non-compliance; no longer met founding need; closed by operation of law due to poor academic performance; sponsor non-renewed, unable to find a new sponsor; closed by sponsor; declining enrollment; merged with/converted to a traditional public school; voluntary closure
2015	30	Financial viability; contractual non-compliance; academic non-compliance; no longer met founding need; unable to find a new sponsor; suspended contract, failed to remedy; merged into an ESC program; contract not renewed, unable to find a new sponsor
2016	20	Financial viability; contractual non-compliance; academic non-compliance; low academic performance and financial issues; suspension lifted, closed; closed by

2017	25	Financial viability; academic viability; poor rated sponsor; contract non-renewed; declining enrollment; governing authority decision to close; closed by sponsor; conversion to traditional public program; voluntary closure due to sponsor ceasing operation; voluntary closure due to board decision
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CHARTER SCHOOL PROGRAM GRANT

GRANT HISTORY

Ohio has received five CSP grants to date: 1998, 2001, 2004, 2007, and 2015 for a total of \$224,335,926. This monitoring report is an examination of the grantee’s 2015 grant implementation and related high-risk conditions. A previous visit was conducted in March 2017 to monitor the implementation of the grantee’s 2015 grant and the related high-risk conditions. The implementation of the grantee’s 2007 grant was previously monitored in 2009.

Grant Award History			
Grant Award Number	Award Period	Award Amount	Number of Subgrants Funded
S282A980010	10/1/98-9/30/02	\$13,099,342	Unknown*
S282A010016	8/1/01-7/31/05	\$62,100,000	Unknown*
U282A040017	10/1/04-9/30/07	\$50,938,127	192
U282A070010	8/1/07-7/31/12	\$48,817,500	147
U282A150023**	8/1/15-7/31/20	\$49,380,957	68 (proposed)

* Subgrant funding information was not systematically collected prior to June 2007.
 **ODE was originally awarded \$71,058,319 to fund 127 subgrantees under Grant Award Number U282A150023; this award and the anticipated number of subgrantees was reduced in September 2017.

GRANT ADMINISTRATION ISSUES

Due to concerns about the ODE’s ability to carry out grant objectives, ED put Ohio’s 2015 award on hold in September 2015 to conduct a supplemental review of the ODE’s grant application. The following September, ED informed the ODE that the supplemental review was complete and the SEA could begin conducting grant activities, subject to High-Risk Specific Conditions and Specific Conditions in the GAN. The subsequent rollout of the ODE’s CSP grant project was delayed due to the supplemental review as well as the implementation of the ODE’s authorizer evaluation system.

Prior to the March 2017 site visit, ED expressed concern about the grantee’s ability to meet the high-risk specific conditions of the grant in a timely manner and in a way that would allow them to conduct a CSP subgrant competition on their desired timeline. Between March 2017 and the December 2017 visit, ED worked closely with the ODE to develop a corrective action plan to address implementation issues and compliance with grant conditions. During the intervening

months, the ODE completed a large body of work, including addressing most of the corrective action plan drawn from the findings of the March 2017 site visit and the high-risk conditions. ED had only minor concerns about route payment documentation heading into the December 2017 visit.

ED may impose specific conditions on the grant award to address administrative and programmatic issues. If specific conditions are noted, they are included under Indicator 3.9.

PROMISING PRACTICES AND AREAS OF CONCERN FROM PREVIOUS MONITORING

A site visit was conducted in March 2017 to monitor implementation of the ODE’s 2015 CSP grant. Findings from this visit were compiled in the October 2017 monitoring report, which identified several areas of concerns related to the implementation of the 2015 grant. Each of these issues is noted below. The complete summary table from the October 2017 monitoring report (based on the March 2017 site visit) can be found in Appendix B.

Indicator #	Areas of Concern (AC) from Previous Monitoring
1.1 Subgrant Application Descriptions and Assurances	AC: Draft Request For Application (RFA) does not include all required descriptions and assurances.
1.3 Definition of Charter School	AC: Definition in draft RFA does not completely align with Federal definition (e.g., clauses on IDEA and elementary/secondary program missing). Oversight of lotteries is indirect, through sponsor evaluations.
1.4 Peer Review	AC: Draft peer review documents are incomplete and inconsistent in desired qualifications for reviewers and methods for notifying, selecting, and training reviewers. Plans for using peer reviews to select subgrantees are undeveloped and do not take into account provisions in grant application (e.g., Community Education Development Organizations (CEDO) involvement, Recovery District Reserve).
2.1 Quality Authorizing Practices	AC: Robust authorizer (sponsor) evaluation framework is in place. However, high-stakes reviews may not take place at least once every five years for some community schools and technical assistance to authorizers may be limited.
2.2 Flexibility and Autonomy	AC: Flexibility and autonomy are outlined in existing state statute, however, there are potential implementation issues regarding conversion charter schools.
2.3 Subgrantee Quality	AC: Subgrant application review materials are not fully developed. Draft documents provided are not internally consistent with subgrant application.
2.4 Plan to Support Educationally Disadvantaged Students	AC: There was not a specific plan for how the CSP grant would support student achievement for educationally disadvantaged students.
2.5 Subgrantee Monitoring	AC: Existing state infrastructure for monitoring is systemic and will provide a valuable mechanism for CSP subgrantee monitoring. However, there has been no development of CSP specific monitoring content.
2.7 Assessment of Performance Measure Data	AC: Draft performance measures have not been fully approved yet. Some performance measures may be challenging to measure (e.g., 2.4, 3.4).

3.1 State-Level Strategy and Vision	AC: Authorizer quality is a significant driver of the SEA's vision for growth and accountability. Recent staffing changes and turnover may inhibit immediate efforts to articulate vision and strategy.
3.2 Federal Programs and Funding	AC: ODE has not yet developed a dissemination and engagement plan to guide communication with key stakeholders.
3.4 Administration of CSP Funds	AC: Grants management division has strong fiscal systems in place; however, these systems are dependent on the program office effectively articulating allowable costs and ongoing collaboration between two divisions.
3.7 Transfer of Student Records	AC: SEA relies on authorizers to ensure that records are appropriately and effectively transferred. In the past, when issues have developed, the SEA has intervened when necessary.
3.9 Compliance with Grant Conditions	AC: Sufficient progress has not been made on several high-risk conditions including High-Risk Specific Condition #5 which impacts the timeline for implementing the RFA.

As noted above, over the course of 2017, the ODE made substantial progress in strengthening its CSP grant and addressing the high-risk conditions and findings from the March 2017 site visit. By the time of the December 2017 site visit, the ODE had addressed many of these areas of concern. This progress is summarized in the following section on indicator performance.

III. INDICATOR PERFORMANCE SUMMARY

The following table shows the rating and recommendations for each indicator on which the grantees were observed as a part of the December 2017 site visit and summarizes progress since the March 2017 site visit. A “+” indicates the rating has improved between the two visits, a “-” indicates the rating has declined, and a “=” indicates the rating has remained the same. The table also provides details about specific issues that affected any rating, promising practices, or other noteworthy highlights. The table is color-coded to provide a quick overview of the grantee’s associated risk in meeting the CSP grant requirements. The color-coding key is below the table.

Between the March and December 2017 site visits, the ODE either maintained or improved upon the ratings for each of the indicators below. At the time of the March 2017 visit, seven indicators were rated “Does not meet”, five indicators were rated “Partially meets”, two were rated “Largely meets”, and seven were rated “Fully meets”. By the December 2017 visit, this shifted to zero indicators rated “Does not meet”, six rated “Partially meets”, one rated “Largely meets”, and fourteen rated “Fully meets”.

INDICATOR PERFORMANCE SUMMARY FROM DECEMBER 2017 SITE VISIT

Indicator	Rating	Recommendation	Progress from March 2017	Notes (implementation issues, promising practices, noteworthy highlights)
Indicator 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.	Partially meets the indicator	Requires Technical Assistance	+	The RFA contains nearly all of the required descriptions and assurances; however, the request and justification of waivers are missing and a focused description of how CSP funds will be used in conjunction with other federal funds is lacking.
Indicator 1.2: ELIGIBLE APPLICANTS.	Fully meets the indicator	None	=	Subgrant application process, including the RFA and technical review, ensures the eligibility of applicants.
Indicator 1.3: DEFINITION OF CHARTER SCHOOL.	Fully meet the indicator	None	+	Definition in the RFA aligns with Federal definition and no concerns were noted at subgrantee schools.
Indicator 1.4: PEER REVIEW.	Fully meets the indicator	None	+	State efforts to widely recruit and obtain a pool of qualified reviewers may be considered a best practice.
Indicator 1.5: PROGRAM PERIODS.	Fully meets the indicator	None	=	The RFA conforms to Federal program periods. State grant system only allows annual grant periods.
Indicator 2.1: QUALITY AUTHORIZING PRACTICES.	Partially meets the indicator	Requires Technical Assistance	+	The sponsor evaluation process has improved authorizer quality. However, there are still issues that need to be addressed regarding charter contracts and authorizer accountability.

Indicator	Rating	Recommendation	Progress from March 2017	Notes (implementation issues, promising practices, noteworthy highlights)
Indicator 2.2: FLEXIBILITY AND AUTONOMY.	Fully meets the indicator	None	+	Previously identified issues with flexibility and accountability in conversion school contracts had been addressed, largely by 20 sponsors ceasing their sponsor responsibilities and the ODE reviewing conversion school contracts against a checklist for compliance issues.
Indicator 2.3: SUBGRANTEE QUALITY.	Fully meets the indicator	None	+	Grant review materials and processes have been created, such as an internal review checklist and a scoring rubric.
Indicator 2.4: PLAN TO SUPPORT EDUCATIONALLY DISADVANTAGED STUDENTS.	Partially meets the indicator	Requires Technical Assistance	+	The RFA now includes Competitive Preference Points with an emphasis on serving disadvantaged students in challenging communities. More sophisticated subgrantee plans and monitoring plans are needed to increase the likelihood of increased academic performance with these student populations.
Indicator 2.5: SUBGRANTEE MONITORING.	Largely meets the indicator	Recommended Technical Assistance	+	The grantee has a detailed monitoring process and tool. However, no training plan is in place for monitors. Desk visits were in process at the time of the site visit; no on-site monitoring had been conducted as of yet.
Indicator 2.6: DISSEMINATION OF INFORMATION AND BEST PRACTICES.	Fully meets the indicator	None	=	Community schools are considered an equal part of State policy for school improvement.
Indicator 2.7: ASSESSMENT OF PERFORMANCE MEASURE DATA.	Fully meets the indicator	None	+	Performance measures have been clarified and approved by ED.
Indicator 3.1: STATE-LEVEL STRATEGY AND VISION.	Fully meets the indicator	None	+	The ODE has increased its capacity to execute the grant. A first subgrant competition has been held and subgrants made. Other processes to deliver on the state-level strategy and vision are in early phases or still emerging.
Indicator 3.2: FEDERAL PROGRAMS AND FUNDING.	Fully meets the indicator	None	+	Efforts to inform relevant individuals and organizations about federal funding, including CSP, are sufficient.
Indicator 3.3: ALLOCATION OF CSP FUNDS.	Fully meets the indicator	None	=	Administrative funds are only used to pay for an external monitor. All SEA staff time is provided in kind.
Indicator 3.4: ADMINISTRATION OF CSP FUNDS.	Partially meets the indicator	Requires Technical Assistance	=	Although adequate systems to administer CSP funds at the SEA level are largely in place, issues were identified at the subgrantee level related to guidance for reimbursement source

Indicator	Rating	Recommendation	Progress from March 2017	Notes (implementation issues, promising practices, noteworthy highlights)
				documentation, tagging of assets, and budget modification documentation.
Indicator 3.5: USE OF GRANT FUNDS.	Fully meets the indicator	None	=	The SEA provides subgrantees with spending guidance and subgrantee purchases thus far are within guidance parameters.
Indicator 3.6: LEA DEDUCTIONS.	Fully meets the indicator	None	=	Charter schools receive subgrant funding directly from the SEA.
Indicator 3.7: TRANSFER OF STUDENT RECORDS.	Partially meets the indicator	Requires Technical Assistance	=	The SEA relies on authorizers to ensure that records are appropriately and effectively transferred. In the past, when issues have developed, the SEA has intervened when necessary.
Indicator 3.8: RECORDKEEPING.	Fully meets the indicator	None	=	Efforts to maintain and retain records are sufficient.
Indicator 3.9: COMPLIANCE WITH GRANT CONDITIONS.	Partially meets the indicator	Requires Technical Assistance	+	The ODE is complying with all high-risk specific grant conditions, though some corrective actions remain to be resolved. Development of a Comprehensive Plan and use of a grant advisory committee may be considered best practices.
Indicator 4.1: MITIGATING RISK OF CHARTER SCHOOL RELATIONSHIPS WITH MANAGEMENT ORGANIZATIONS	No Rating	Recommended Technical Assistance	N/A (new)	The ODE has developed a monitoring protocol which addresses some of the risk relationships with management organizations pose to the CSP objectives. No monitoring has been performed to date, and it is not clear the process can mitigate risk for subgrantees in the short-term given the lack of authority the ODE has over sponsors or operators.
Indicator 4.2: OVERSIGHT OF EDFACTS DATA COLLECTION FOR MANAGEMENT ORGANIZATIONS	No Rating	None	N/A (new)	The ODE uses a combination of existing State data collection systems and individualized instruments to collect charter school data. The ODE is working to systematize all charter school data collection to reduce burden.

Indicator Color Coding Key
Fully meets the indicator
Largely meets the indicator
Partially meets the indicator
Does not meet the indicator.

IV. FINDINGS

This section presents the site visit team’s observations of the grantee’s implementation and administration of the CSP grant for each indicator for both the March 2017 and December 2017 site visits. Each indicator is stated, followed by information from the grantee’s approved grant application and the site visit team’s observations and findings of grantee implementation. Detailed summaries of the site visit team’s observations are provided for each indicator item throughout this report. Where appropriate, the report also identifies implementation issues, non-substantive changes, and promising practices. A double dash (--) separates content from the two site visits. Text above the double dash is from the October 2017 monitoring report (based on the March 2017 site visit); text below the double dash reflects updates based on the December 2017 site visit. The implementation checkboxes for indicators, however, reflect findings for the December 2017 site visit only.

1. SUBGRANT APPLICATION AND AWARD PROCESS

A major function of CSP grantees is to conduct application and award processes to distribute CSP funds to subgrantees in the State, including funds for new charter school planning and implementation as well as for the dissemination of successful charter school practices. A minimum of 95 percent of each State’s CSP allocation is distributed to subgrantees through this process. This section focuses on the State’s requirements of subgrant applicants and its processes for evaluating, selecting, and awarding subgrants. Specifically, this section addresses the State’s performance in fulfilling its responsibilities to:

- Require subgrant applicants to submit an application with Federally required descriptions and assurances
- Determine that applicants are eligible to receive CSP subgrants
- Ensure that eligible applicants meet the Federal definition of a charter school
- Employ a peer review process to evaluate subgrant applications
- Ensure CSP subgrants adhere to allowable time periods

Indicator 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES. The State requires each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency that includes the descriptions and assurances required by Federal statute.

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.		
ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
(A) a description of the educational program to be implemented by the proposed charter school, including — <ul style="list-style-type: none"> (i) how the program will enable all students to meet challenging State student academic achievement standards; (ii) the grade levels or ages of children to be served; and (iii) the curriculum and instructional practices to be used; 	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The first paragraph of section D (Research-Based Academic Program/Comprehensive Design Aligned with Standards) of the draft RFA asks for a description that refers to alignment to Ohio’s Academic Content Standards, satisfying requirement (A)(i), and curriculum and instructional practices, satisfying requirement (A)(iii). Section A (Executive Summary) asks for a one-page summary introducing the community school and refers to the grade levels to be served, satisfying requirement (A)(ii). -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. The ODE’s process for developing the content of its subgrant application is included in its Comprehensive Plan, which provides a guide for the overall implementation of the grant and details processes required throughout the lifecycle of the grant. As stated in the Comprehensive Plan, procedures for design of the RFA included reviewing the RFA used for the most recent application round as well as recent legislation, comments from monitoring, advisory committee feedback, ED review, and other input for necessary changes. The ODE also used a CSP Grant Requirements Crosswalk when developing its RFA and

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
		<p>Comprehensive Plan to help ensure that all required elements were included.</p> <p>Ohio’s April 2017 Request for Applications requests description of aspects of the educational program to be implemented by the proposed charter school in the Cover Page, Executive Summary, and Section E. Section E, Educational Model (p. 42), asks applicants to “fully describe the academic program, curriculum, instructional practices and plans for establishing school culture.” It further specifies that “The curriculum should be research-based, aligned to Ohio’s standards and tailored to meet the needs of its anticipated student population.” The grade levels of the children to be served are to be entered on the Cover Page and incorporated in Section A, Executive Summary (p. 38). Section A also asks the applicant to describe how the school will prepare students for academic success and to introduce the educational philosophy and approach. The review criteria in the Subgrant Application Rubric refer to the same aspects of the school’s educational program description.</p>
<p>(B) a description of how the charter school will be managed;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Section G (Board Governance and Management Accountability) of the draft RFA asks for “detailed information describing the school’s strategies for managing the community school...” -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Section I (p. 46) of the April 2017 RFA is titled Governance and Management Plan. It asks applicants to address the composition and selection process for the governing board, the preparation of board members and</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
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policies, and the process the school will use to develop policies and procedures in accordance with State and Federal laws. The board’s role is also referenced in Section J: Business Capacity and Continued Operation (p. 47), where the directions state, “The school’s plan for organization, management, and financial viability details board oversight.” In addition, Section H, School Personnel and External Support (p. 45), seeks information on the school’s organizational structure, key staff positions, founders, and network of support. Further, Appendix 12 (pp. 66-67) of the RFA is a CMO/EMO Questionnaire that collects information which the ODE uses to ensure subgrant recipients who contract with a CMO/EMO are independent of that management organization.

<p>I a description of — (i) the objectives of the charter school, and (ii) the methods by which the charter school will determine its progress toward achieving those objectives;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Section B.6: Appendix H: Performance Management Plan of the draft RFA asks for the school’s Goals/Objectives and Current Performance Management System, including the data, methods, analyses, and other details. -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Section F (p. 43) of the April 2017 RFA focuses on Schools Goals. It directs the applicant to “describe the academic and non-academic goals it will use to measure its success, as well as the methods it will use to assess progress toward these goals throughout the school year.” In addition, Appendix 9: Performance Management Plan (pp. 62-63), calls for applicants to provide a list of goals/objectives as well as the associated action/activity that will be used to assess progress under the grant. More detailed information on each</p>
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Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
<p>(D) a description of the administrative relationship between the charter school and the authorized public chartering agency;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>of the grant goals, activities, and performance measures is requested in Appendix 11 (p. 65).</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Section G (Board Governance and Management Accountability) of the draft RFA asks for “detailed information describing...the relationship between the governing board and (1) the sponsor...”. The draft RFA also requires the applicant to submit a copy of the preliminary agreement or charter contract between the school and the sponsor.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Section A: Executive Summary (p.38) of the April 2017 RFA directs applicants to include a description of “the administrative relationship between the community school and its sponsor.” Applicants are also required to submit a copy of the Preliminary Agreement or Executed Contract with the sponsor as Application Appendix 4.</p>
<p>(E) a description of how parents and other members of the community will be involved in the planning, program design, and implementation of the charter school;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Section H (Parent/Community Involvement and Marketing) of the draft RFA directs the applicant to “[p]rovide detailed information on the level of support that the community school</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
<p>(F) 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);</p>	<p> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No </p>	<p>has from prospective parents and community members and organizations, and how the school will ensure ongoing involvement.” It does not specifically mention involvement in the planning, program design, and implementation phases of the charter school.</p> <p>--</p> <p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. Section G: Outreach and Engagement (44) of the April 2017 RFA directs applicants to “include plans for engaging families and community members in the school’s planning, development, and continued operations.” In addition, Assurance 8 of the Statement of Assurances (p. 32) that the applicant must sign stipulates “That the SUBGRANTEE will provide reasonable opportunities for participation by teachers, parents, and other interested agencies, organizations, and individuals in the planning for and operation of each program, as may be necessary according to statute.”</p> <p> <input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). </p> <p>March 2017 site visit: Section I (Business Capacity and Continued Operation) of the draft RFA does not mention the school’s authorized public chartering agency. The ODE staff acknowledged in the onsite interview the need to add the authorizer’s role in the continued operation of the school to this section.</p> <p>--</p> <p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. In the April</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
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2017 RFA, a Statement of Sponsor Assurances (p. 36) completed and signed by the sponsor is required to be submitted as part of the subgrant application. On this Statement, the sponsor is directed 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.”

<p>(G) a request and justification for waivers of any Federal statutory or regulatory provisions that the eligible applicant believes are necessary for the successful operation of the charter school, and a description of any State or local rules, generally applicable to public schools, that will be waived for, or otherwise not apply to the school;</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The draft RFA does not contain any mention of or place for applicants to provide a request and justification for waivers. -- December 2017 site visit: A request and justification of waivers were missing during the December 2017 site visit. The April 2017 RFA does not contain any mention of or place for applicants to provide a request and justification for waivers. However, the CSP Grant Requirements Crosswalk submitted by the ODE as evidence of the process of developing the RFA and Comprehensive Plan shows that this subgrant application requirement was considered by the ODE but excluded from the RFA because the State did not intend to allow subgrantees to request a waiver. During the monitoring interviews, the ODE staff indicated that they would revise the RFA in the future to include a place for applicants to request and justify waivers.</p>
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<p>(H) a description of how the subgrant funds or grant funds, as appropriate, will be used, including a description of how such funds will be used in</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p>
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Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
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conjunction with other Federal programs administered by the Secretary;

Promising practice(s) identified (explain below).

March 2017 site visit:

While the draft RFA asks applicants to provide information on how the subgrant funds will be used, it does not in any place ask applicants to address how such funds will be used in conjunction with other Federal programs administered by the Secretary.

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December 2017 site visit:

The subgrant RFA required a clear statement of how subgrant funds would be used but there was not an explicit requirement to describe how those funds would be used in conjunction with other Federal funds. Section B: Subgrant Project Goals, Budget, Budget Narrative and Evaluation Methods (p. 39) of the RFA anticipates that subgrant applications will fully describe the intended use of subgrant funds and, further, that the budget narrative will also include a description of the supplementary funding needed for each project goal. In addition, Section B states as a review criterion that "Each subgrant project goal aligns with the school's mission, vision, educational program and other federal grant programs." However, the RFA does not require itemization of the Federal programs or funding amounts that will be used in conjunction with the CSP funds. Only one of the three successful subgrant applications indicated the amount of grant and non-grant funds that would be used within each category of their proposed budget, but the sources of the non-grant funds were not specified. The other two applications did not address other funding beyond the grant funds that would be used to accomplish the subgrant project goals.

One of the review criteria in Section J: Business Capacity and Continued Operation (p. 47) also addresses the use of Federal program funds: "The school explains how other federal, state,

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
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local, or private funds will be used to assist the school in institutionalizing effective practices.” However, the use of Federal funds in conjunction with the subgrant funds was not specified in Section J of any of the three funded subgrant applications.

The RFA also requires applicants to submit a copy of the community school’s annual and long-term budgets, and last audited financial statement, as Appendix 3 to the application. A review of the Appendix 3 documents for the awarded subgrantees revealed variation in the specificity with which revenue sources were labeled as Federal programs.

Thus, while there is a clear focus in the RFA and applications on how subgrant funds would be used, how these funds would be used in conjunction with other Federal funds is given little if any attention. It would be difficult for the ODE to ascertain from the information submitted in the application how the CSP subgrant funds would be used in conjunction with other Federal programs administered by the Secretary.

<p>(I) a description of how students in the community will be — (i) informed about the charter school, and (ii) given an equal opportunity to attend the charter school;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Section H (Parent/Community Involvement and Marketing) of the draft RFA asks the applicant to provide an executive summary of the school’s Marketing Plan and to describe the full Marketing plan in Appendix G, and a selection criterion provided in the draft RFA is that the executive summary “describes how students and parents in the community will be informed about the charter school...”. However, the draft RFA does not contain an explicit place or instructions for including this appendix.</p>
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Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
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The requirement for a description of how students will be given an equal opportunity to attend the charter school is not explicit in the draft RFA. The draft RFA includes a section on Lottery and Enrollment Requirements, which states that “[t]he applying community school has an enrollment policy that includes admitting students on the basis of a lottery, if more students apply for admission than can be accommodated.” Applicants are required to submit the school’s enrollment policy and procedures, including a description of the lottery, as Appendix A of the application package; however, the draft RFA does not contain an explicit place or instructions for including this appendix.

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December 2017 site visit:

This element had been addressed and was being implemented as necessary during the December 2017 site visit. Section G: Outreach and Engagement (p.44) of the April 2017 RFA asks applicants to include plans for engaging families and community members in the school; one review criterion for this section is “The school describes how students and parents in the community will be informed about the community school...”

Page 5 of the April 2017 RFA cites U.S. Code, stating “community schools receiving CSP funds must provide all students in the community with an equal opportunity to attend the charter school.” Assurance 57 (p. 35 of the RFA) of the Statement of Assurances that applicants must sign also contains this clause. Applicants must include their school enrollment policy, including lottery protocol, as Appendix 1 to the application, thus describing how students in the community will be given an equal opportunity to attend the charter school.

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
		<p>Instructions in the RFA for Appendix 8: Marketing Plan (p. 61) contain related expectations for components of the school's marketing plan:</p> <ul style="list-style-type: none"> • "A clear description of how the school will inform the community about its enrollment process, procedures, and deadlines;" and • "A description of how the marketing plan is multi-modal and increases access to the community school for all prospective students."
<p>(J) an assurance that the eligible applicant will annually provide the Secretary and the State educational agency such information as may be required to determine if the charter school is making satisfactory progress toward achieving the objectives described in subparagraph (C)(i);</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Assurance 43 in the draft RFA has similar language to the required assurance except that it refers to information on the charter school making satisfactory progress toward achieving the stated project objectives, rather than toward the objectives of the charter school, as referenced by subparagraph (C)(i). -- December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. Assurance 46 (p. 35 of the RFA) of the Program-Specific Assurances that applicants must sign as part of the application states, "That the SUBGRANTEE will annually provide the U.S. Secretary of Education and ODE such information as may be required to determine if the community school is making satisfactory progress toward achieving the objectives described in subparagraph (C)(i)."</p>
<p>(K) an assurance that the eligible applicant will cooperate with the Secretary</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below).</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
<p>and the State educational agency in evaluating the program assisted under this subpart;</p>		<p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Assurance 18 in the draft RFA states, "The SUBGRANTEE shall cooperate in any evaluation by the Department and ED." --</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Assurance 47 (p. 35 of the RFA) of the Program-Specific Assurances that applicants must sign as part of the application states: "That the SUBGRANTEE will cooperate with the U.S. Secretary of Education and ODE in evaluating the program assisted under this subpart." Assurance 18 (p. 33) also states: "The SUBGRANTEE shall cooperate in any evaluation by the DEPARTMENT."</p>
<p>(L) a description of how a charter school that is considered a local educational agency under State law, or a local educational agency in which a charter school is located, will comply with Sections 613(a)(5) and 613(e)(1)(B) of the Individuals with Disabilities Education Act;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The draft RFA does not in any place ask applicants to describe how the charter school or relevant local educational agency will comply with Sections 613(a)(5) and 613(e)(1)(B) of the Individuals with Disabilities Education Act. --</p> <p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. Section D:</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
<p>(M) if the eligible applicant desires to use subgrant funds for dissemination activities under Section 5202(c)(2)(C), a description of those activities and how those activities will involve charter schools and other public schools, local educational agencies, developers, and potential developers; and</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>	<p>Educationally Disadvantaged Students (p. 41) of the April 2017 RFA addresses what information the applicant proposal should include regarding recruiting, enrolling, and serving educationally disadvantaged students. One review criterion includes: "...a description of how the school will comply with sections 613(a)(5) and 613(e)(1)(B) of the Individuals with Disabilities Education Act." Community schools in Ohio are considered local educational agencies under State law.</p> <p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
<p>(N) such other information and assurances as the Secretary and the State educational agency may require.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The draft RFA includes many other information requirements and assurances, and the Reporting section of the draft RFA states that "as part of the Federal CSP grant...subgrantees (and/or Sponsors) will be required to...submit interim reports, reimbursement requests, and any other required information in a timely and efficient manner...". -- December 2017 site visit:</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
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This element was still being implemented as necessary during the December 2017 site visit. The April 2017 RFA includes many other information requirements and assurances, including Assurance 42 (p. 34) addressing “Any additional assurances listed within the document library for a specific application as required by the ODE program office administering the program” and other assurances relating to Federal laws as well as program-specific assurances.

Sources: *March 2017* *Request for Applications; Ohio Community Schools Program; Community School Application for a Planning/ Implementation Subgrant (draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft; draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft for tech editing 02 24 2017)*

December 2017 *Ohio Request for Application; Subgrantee—Federal Charter School Program (CSP) Grant (April 2017); CSP Grant Requirements Crosswalk; Ohio CSP Grant Administration Comprehensive Plan*

Indicator 1.2: ELIGIBLE APPLICANTS. The State ensures each applicant desiring to receive a subgrant meets the term “eligible applicant.”

Table 1.2: ELIGIBLE APPLICANTS.		
The State ensures each applicant desiring to receive a planning or implementation subgrant meets the term “eligible applicant,” including:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Ensure the school’s developer has applied to an authorized public chartering authority to operate a charter school.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). <p>March 2017 site visit: As described in the draft RFA, “...eligibility to apply for the 2018 CSP subgrant includes: A community school developer/founder applying for a planning grant must hold a preliminary agreement describing the intention of an eligible sponsor and the developer to pursue...the execution of a community school contract...and [t]he applying community school must be sponsored by an eligible sponsor and...opened...or hold a community school contract...”. A copy of the preliminary agreement or executed contract is required to be included in Appendix E to the application. The OCS staff stated that they will check that the document is submitted.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. The ODE ensures that the school’s developer has applied to an authorized public charter authority to operate a charter school by stating relevant requirements on p. 6 of the April 2017 RFA and requiring that either a preliminary agreement (for planning subgrantees) or a community school contract (for implementation subgrantees) be submitted as part of the application.</p> <p>For planning applicants, “A community school developer/founder applying for a planning grant must hold a preliminary agreement describing the intention of an eligible sponsor and the developer to pursue, in good faith, the execution of a community school contract.” Further, the preliminary agreement must be “adopted prior to March 15, 2017, with an intention to open for the first time in the fall of 2018 if applying for a planning grant.”</p> <p>Community school applicants for implementation subgrants “must be sponsored by an eligible sponsor” and be entering or in its first or second year of operation.</p>

Table 1.2: ELIGIBLE APPLICANTS.

The State ensures each applicant desiring to receive a planning or implementation subgrant meets the term “eligible applicant,” including:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Ensure the school’s developer has provided adequate and timely notice to that authority under Section 5203(d)(3).	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>A copy of the preliminary agreement or executed contract (i.e., the charter) is required of all applicants to be submitted as Appendix 3 to the application. These documents are checked as part of the technical review.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The draft RFA states, “The applicant’s...sponsor must approve the school’s intention to apply for the CSP grant...”. This requirement ensures adequate and timely notice but also goes beyond it. -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. The ODE ensure the school’s developer has provided adequate and timely notice to an authorized public chartering authority under Section 5203(d)(3) by requiring a Statement of Sponsor Assurances (p. 36 in the April 2017 RFA) be submitted as part of the subgrantee application. The sponsor’s signature on this document indicates not only notice but acknowledgment of several confirmations and assurances of the sponsor’s role with regard to the applying community school.</p>
Verify non-profit status of the charter holder.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The OCS has a checklist for reviewing the community school contracts that are submitted with the subgrant application. In the checklist, one required element is: “Each contract entered into between a sponsor and the governing authority of a community school shall specify the following: That the school shall be established as...(b) A public benefit corporation established under Chapter 1702 of the Revised Code, if established after April 8,</p>

Table 1.2: ELIGIBLE APPLICANTS.

The State ensures each applicant desiring to receive a planning or implementation subgrant meets the term “eligible applicant,” including:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
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2003. The checklist also prompts the reviewer to ascertain if a copy of the Secretary of State certificate is provided.

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December 2017 site visit:

This element was still being implemented as necessary during the December 2017 site visit. For the ODE’s 2017 subgrantee application process, verification of the non-profit status of the charter holder was accomplished by using the Comprehensive Continuous Improvement Plan (CCIP), the Department’s e-grant application system, for CSP submissions. To access the CCIP, applicants must have an Internal Retrieval Number (IRN), unique school identifying number, and to obtain an IRN a community school must provide documentation, including tax and funding information, relevant to its organizational status. Under Chapter 1702 of Ohio’s Revised Code a community school must be established as a nonprofit corporation (if established prior to April 8, 2003) or a public benefit corporation (if established after April 8, 2003). Page 19 of the April 2017 RFA contains technical assistance on how to obtain the access needed to enter the CCIP if a user does not have an existing IRN or does not know if their organization has an IRN.

Award not more than one grant to a school.

- Yes
- No

- Implementing as proposed or necessary (explain below).
- Implementation issues identified (explain below).
- Non-substantive changes in proposed activities (explain below).
- Promising practice(s) identified (explain below).

March 2017 site visit:

The draft RFA states, “Community schools who have received CSP grants or subgrants in previous years are not eligible to apply.” (The draft also contains the comment that “This will be revised if a waiver for significant expansion is submitted to and approved by ED.”). Schools apply with an IRN, or Internal Retrieval Number, and the checklist for reviewing the community school contracts that are submitted with the subgrant application also prompts the reviewer to look for the community school’s IRN. The IRN is a unique identifier attached to each school and is used as the vendor number for the SEA to make payments. The ODE staff stated that the IRN would be checked to ensure the applicant had not previously received a subgrant. However, it is not clear that

Table 1.2: ELIGIBLE APPLICANTS.

The State ensures each applicant desiring to receive a planning or implementation subgrant meets the term “eligible applicant,” including:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>For dissemination applicants: ensure the charter school has been in operation for at least 3 consecutive years and has demonstrated overall success, including—</p> <ul style="list-style-type: none"> (i) substantial progress in improving student academic achievement; (ii) high levels of parent satisfaction; and (iii) the management and leadership necessary to overcome initial start-up problems and establish a thriving, financially viable charter school. 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<p>the OCS has an established process in place for conducting this check.</p> <p>--</p> <p>December 2017 site visit:</p> <p>This element had been addressed and was being implemented as necessary during the December 2017 site visit. The April 2017 RFA makes clear that schools may not receive CSP funding under more than one grant. Page 6 of the April 2017 RFA states, “Community schools that received CSP grants directly from the U.S. Department of Education or Ohio subgrants prior to 2015” are ineligible for subgrants (2015 is the start date of Ohio’s current SEA grant, so schools could not receive non-SEA grants after that time). The prohibition on previous grants is also addressed in Assurance 56 of the Program-Specific Assurances (p. 35), which reads: “That the SUBGRANTEE assures it has NOT received CSP grant funds for the same or substantially similar purpose directly from the U.S. Department of Education or the Ohio Department of Education.” The Technical Review Checklist (p. 68) also includes the item that “Applicant has never received a CSP grant from the U.S. Dept. of Education or the Ohio Department of Education.” The ODE requested from ED a list of all Ohio schools that had previously received CSP funds (including through CMO grants) in order to conduct this check. Further, the subgrantees visited were all aware of the prohibition on receiving more than one start-up or implementation grant.</p> <p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p>

Table 1.2: ELIGIBLE APPLICANTS.

The State ensures each applicant desiring to receive a planning or implementation subgrant meets the term “eligible applicant,” including:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Sources: March 2017		<i>Request for Applications; Ohio Community Schools Program; Community School Application for a Planning/Implementation Subgrant (draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft, draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft for tech editing 02 24 2017); Community School Contract Review Checklist 2016-2017, revised 03/08/2016</i>
December 2017		<i>Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017); Ohio Revised Code Section 3314.03(A)(1); Ohio Department of Education, Establishing A New Community School in OEDS; Ohio – CSP Awards Database 6.7.2017</i>

Indicator 1.3: DEFINITION OF CHARTER SCHOOL. The State ensures each eligible applicant meets the term “charter school.”

Table 1.3: DEFINITION OF CHARTER SCHOOL.		
ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term ‘charter school’ means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
(A) in accordance with a specific State statute authorizing the granting of charters to schools, is exempt from significant State or local rules that inhibit the flexible operation and management of public schools, but not from any rules relating to the other requirements of this paragraph;	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The draft RFA states, “To be eligible for a Planning/Implementation subgrant, applicants must first conform to the Federal definition of a community school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)].” In this instance, it appears that the SEA has replaced “charter” with “community” in the draft RFA, which does not strictly adhere to the Federal definition. Assurances 39 and 41 also address compliance with the Federal definition of a charter school. Assurance 41 includes reference to the Ohio charter school statute, specifically, “The SUBGRANTEE operates in accordance with Ohio Revised Code, Chapter 3314, as applicable.” -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, “To be eligible for a planning or implementation subgrant, applicants must first conform to the federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]” and lists verbatim the definitions a – l contained in Federal law. The ODE checks that applicants meet the Federal definition in the technical review of applications. No concerns were noted either at the State or school level about eligible applicants being exempt from significant State or local rules that inhibit the flexible operation and management of public schools in accordance with a specific State statute authorizing the granting of charters to schools. All subgrantees exhibited flexible operation and management of their schools under Ohio charter school law.
(B) is created by a developer as a public school, or is adapted by	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).

Table 1.3: DEFINITION OF CHARTER SCHOOL.

<p>ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
<p>a developer from an existing public school, and is operated under public supervision and direction;</p>		<p><input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(a) Is created by a developer as a public school, or is adapted by a developer from an existing public school, and is operated under public supervision and direction." Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – I contained in Federal law. The ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants being created by a developer as a public school, or adapted by a developer from an existing public school, and operated under public supervision and direction. All subgrantees operated as public schools and were governed by a board of directors.</p>
<p>(C) operates in pursuit of a specific set of educational objectives determined by the school's developer and agreed to by the authorized public chartering agency;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: (b) Operates in pursuit of a specific set of educational objectives determined by the school's developer and agreed to by the authorized public chartering agency. The SEA replaced "charter" with "community" in the draft RFA. Because no subgrants have been awarded to date, the site visit team was</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>unable to assess subgrantee schools' compliance with this provision.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – I contained in Federal law. The ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants operating in pursuit of a specific set of educational objectives determined by the school's developer and agreed to by the authorized public chartering agency. All subgrantees held charters with educational objectives agreed to by the school and its sponsor.</p>
<p>(D) provides a program of elementary or secondary education, or both;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Assurance 41 of the draft RFA, which most closely mirrors the definition of a charter school contained in Section 5210(1) of the ESEA, fails to include the elementary and secondary education clause. Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision.</p> <p>--</p> <p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – I contained in</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
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Federal law. The ODE checks that applicants meet the Federal definition in the technical review of applications.

No concerns were noted either at the State or school level about eligible applicants providing a program of elementary or secondary education, or both. Page 5 of the April 2017 RFA states that “the applicant must plan or implement...a general education school.” The RFA goes on to state, “...for the purposes of this subgrant, the Department defines general education schools as community schools serving any grades from kindergarten through 12...” The subgrantees were operating schools with grade configurations encompassing K to 8.

(E) is nonsectarian in its programs, admissions policies, employment practices, and all other operations, and is not affiliated with a sectarian school or religious institution;

- Yes
- No

- Implementing as proposed or necessary (explain below).
- Implementation issues identified (explain below).
- Non-substantive changes in proposed activities (explain below).
- Promising practice(s) identified (explain below).

March 2017 site visit:

Assurance 41 of the draft RFA includes the clause: “(c) Is nonsectarian in its programs, admissions policies, employment practices, and all other operations, and is not affiliated with a sectarian school or religious institution.” Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools’ compliance with this provision.

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December 2017 site visit:

This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, “To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]” and lists verbatim the definitions a – l contained in Federal law. The ODE checks that applicants meet the Federal definition in the technical review of applications.

No concerns were noted either at the State or school level about eligible applicants being nonsectarian and not affiliated with a sectarian school or religious institution. The one subgrantee who rented from a church had removed religious symbols and artifacts on the leased portion of the grounds.

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
(F) does not charge tuition;	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(d) Does not charge tuition." Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision. -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – I contained in Federal law. The ODE checks that applicants meet the Federal definition in the technical review of applications. No concerns were noted either at the State or school level about eligible applicants charging tuition. The subgrantee schools charged minimal fees for special activities or other items if they did not provide them free of charge to students.
(G) complies with: the Age Discrimination Act of 1975, Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and Part B of the Individuals with Disabilities Education Act;	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(e) Is in compliance with and will continue to comply with the Age Discrimination Act of 1975, Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and Part B of the Individuals with Disabilities Education Act." Because no subgrants have been awarded to date, the site visit team was

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>unable to assess subgrantee schools' compliance with this provision.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – I contained in Federal law. The ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants complying with applicable Federal laws. For example, each subgrantee school provided a program of special education for eligible students and the ODE noted that it has specific procedures for handling any complaints about special education.</p>
<p>(H) is a school to which parents choose to send their children, and that admits students on the basis of a lottery, if more students apply for admission than can be accommodated;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
		<p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(f) Is a school to which parents choose to send their children, and that admits students on the basis of an annual lottery, if more students apply for admission than can be accommodated." Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision.</p> <p>--</p>
		<p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – I contained in</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
(I) agrees to comply with the same Federal and State audit requirements as do other elementary schools and secondary schools in the State, unless such requirements are specifically waived for the purpose of this program;	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Federal law. The ODE checks that applicants meet the Federal definition in the technical review of applications. No concerns were noted either at the State or school level about eligible applicants being schools to which parents choose to send their children, and that admit students on the basis of a lottery, if more students apply for admission than can be accommodated. The RFA contains a section on lottery requirements and requires the school's lottery policy to be submitted as Appendix 1 to the application. None of the subgrantees had more students apply for admission than could be accommodated, so none had yet employed a lottery.
	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(g) Agrees to comply with the same Federal and state audit requirements as do other elementary schools and secondary schools in the State." Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision. -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – I contained in Federal law. The ODE checks that applicants meet the Federal definition in the technical review of applications. No concerns were noted either at the State or school level about eligible applicants complying with audit requirements. Each community school's last audited financial statement is required to submit in Appendix 3 of the application.

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
(J) meets all applicable Federal, State, and local health and safety requirements;	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).
		<p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(h) Meets all applicable Federal, state, and local health and safety requirements." Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – I contained in Federal law. The ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants meeting applicable health and safety requirements. The April 2017 RFA contains Assurance 23 (p. 33) stating "That the SUBGRANTEE will comply with any applicable federal, state, and local health or safety requirements that apply to the facilities used for a project (34 CFR 76.683)." In addition, community school sponsors must submit to the ODE a pre-opening checklist for each school every year that includes compliance with health and safety requirements. One subgrantee school that was renovating a building opened later than expected because it needed to wait to be cleared for the required occupancy approvals.</p>
(K) operates in accordance with State law; and	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).

Table 1.3: DEFINITION OF CHARTER SCHOOL.

<p>ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
<p>(L) has a written performance contract with the authorized public chartering agency in the State that includes a description of how student performance will be measured in charter schools pursuant to State assessments that are required of other schools and pursuant to any other assessments mutually agreeable to the authorized public chartering agency and the charter school.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(i) Operates in accordance with state law." Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision. -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – I contained in Federal law. The ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants operating in accordance with State law. The April 2017 RFA contains Assurance 52 (p. 35) stating "That the subgrantee will comply with all applicable laws and rules." Further, Assurance 5 in the Statement of Sponsor Assurances (p. 36) reinforces the community school sponsor's responsibility to monitor the community school's compliance with all applicable laws and to take the necessary steps to intervene to correct problems.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(j) Has a written performance contract with an authorized sponsor, rated exemplary or effective overall in the latest sponsor evaluation, that includes a description of how student performance will be measured in community schools pursuant to state assessments that are required of other public schools and pursuant to any other assessments mutually agreeable to by the sponsor and the community school." Because no</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
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subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision.

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December 2017 site visit:

This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – I contained in Federal law. The ODE checks that applicants meet the Federal definition in the technical review of applications.

No concerns were noted either at the State or school level about eligible applicants having a written performance contract with an authorized charter school sponsor that includes a description of how student performance will be measured pursuant to prescribed assessments. As noted earlier, each applicant must provide a copy either of a preliminary agreement or executed contract with its sponsor as an appendix to the application. Under Ohio Revised Statutes 3314.03 (A)(3), every community school contract must include: "The academic goals to be achieved and the method of measurement that will be used to determine progress toward those goals, which shall include the statewide achievement assessments."

Sources:	<i>March 2017</i>	<i>Request for Applications; Ohio Community Schools Program; Community School Application for a Planning/Implementation Subgrant (draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft; draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft for tech editing 02 24 2017)</i>
	<i>December 2017</i>	<i>Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017); Ohio Revised Code Section 3314.03 (A)(3)</i>

Table 1.3: DEFINITION OF CHARTER SCHOOL Lottery and Enrollment Processes. Detailed Information.

Approach to ensuring that lotteries and enrollment practices at all funded schools meet Federal guidelines.	Provide detailed narrative about the grantee’s current approach.
<p>How lotteries for admission to charter schools will be conducted in the State, including student enrollment preferences or exemptions.</p>	<p>March 2017 site visit: Provisions for charter school lotteries and student enrollment preferences and exemptions in the state are contained in ORC 3314.06. Division (H) of that statute states, “That, except as otherwise provided under division (B) of this section or section 3314.061 of the Revised Code, if the number of applicants exceeds the capacity restrictions of division (F) of this section, students shall be admitted by lot from all those submitting applications, except preference shall be given to students attending the school the previous year and to students who reside in the district in which the school is located. Preference may be given to siblings of students attending the school the previous year.” Division (B) (1) states, “That admission to the school may be limited to students who have attained a specific grade level or are within a specific age group; to students that meet a definition of "at-risk," as defined in the contract; to residents of a specific geographic area within the district, as defined in the contract; or to separate groups of autistic students and nondisabled students, as authorized in section 3314.061 of the Revised Code and as defined in the contract.” The statute also allows single-gender schools. Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools’ implementation of enrollment practices and lotteries.</p> <p>--</p> <p>December 2017 site visit: Ohio’s April 2017 RFA (pp. 8-9) contains an explanation of lottery and enrollment requirements for subgrant applicants, addressing Exemptions, Enrollment Policy and Weighted Lotteries. This section of the RFA cites and is in accordance with 20 USC 7221i(1)(H) and Section E of the federal CSP Nonregulatory Guidance. Among other provisions, it makes clear that the use of weighted lotteries and designated feeder patterns are not allowable for CSP subgrantees (the latter stipulation is repeated on p. 6 in the Ineligible Applicants section).</p> <p>Subgrant applicants are required to submit the community school’s enrollment policy, including lottery protocol, as Appendix 1 to the application. In the technical review, the ODE staff checks that the applicant does not have designated feeder patterns or weights associated with its lottery.</p> <p>The lottery and enrollment policies for all three of the subgrantees appeared to be in compliance with State law and Federal requirements. The team was unable to assess subgrantee schools’ lottery implementation because none of the schools were oversubscribed and needed to use a lottery.</p>
<p>Use of weighted lottery (if applicable).</p>	<p>March 2017 site visit: At the time of the site visit, the ODE had decided not to seek approval from ED for the use of weighted lotteries by charter school subgrantees under the</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL Lottery and Enrollment Processes. Detailed Information.

Approach to ensuring that lotteries and enrollment practices at all funded schools meet Federal guidelines.	Provide detailed narrative about the grantee’s current approach.
	<p>CSP grant award (per GAN Specific Condition 5). The ODE staff planned to send an email to their program officer stating this.</p> <p>--</p> <p>December 2017 site visit: Ohio does not allow subgrantees to use weighted lotteries. Page 9 of the April 2017 RFA states, “The use of weighted lotteries is not permitted by community schools receiving CSP funds.”</p>
<p>Mechanisms that exist for the SEA or authorizers to review, monitor, or approve lotteries or student enrollment preferences or exemptions from the lottery.</p>	<p>March 2017 site visit: The ODE staff stated that the ODE’s role is to interact with the authorizer around their review of school lotteries. Sponsors are required to review charter schools’ policies and procedures to ensure they are in compliance. The SEA evaluates the sponsor on all laws and rules; oversight of the lottery is one of 300 items.</p> <p>--</p> <p>December 2017 site visit: Authorizer oversight of lotteries and the SEA evaluation of sponsors are the main mechanisms for reviewing, monitoring, and approving charter school lotteries and student enrollment preferences or lottery exemptions. The ODE staff stated that lottery requirements are included in training for sponsors. In addition, the SEA collected and reviewed lottery policies as part of the Spring 2017 CSP subgrant application process.</p>

Sources: *March 2017* Ohio CSP Grant Application; Grant Award Notification U282A150023 – 16 (Sept. 14, 2016); Ohio Revised Code 3314.06

December 2017 Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017); lottery policies of subgrantee schools; Ohio Revised Code 3314.06

Indicator 1.4: PEER REVIEW. The State uses a peer review process to review and select applications for assistance under this program.

Table 1.4: PEER REVIEW.		
Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Identification and notification to peer reviewers: Ohio’s CSP application stated, “[Peer reviewers] will be recruited from among education practitioners in the state...” (p. 54).</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>March 2017 site visit: The ODE’s plans for identifying and notifying peer reviewers were stated somewhat differently across sources and reflected a still-emerging process:</p> <ul style="list-style-type: none"> • Ohio’s draft Agreed-Upon Procedures (AUPs, revised February 8, 2017) indicate “The Department will solicit applications from potential peer reviewers using the same communication means as listed in Section 1.3 [sic] above. Section 1.2 of those AUPs lists “a variety of means including direct e-mails to stakeholders (sponsors, schools, organizations); the Department’s Ed Connections Newsletter and Ohio Ed Updates; as well as posting the information on its website, Facebook, Twitter, “n”, and Instagram” for dissemination of public notice of the CSP grant. • The draft Call for Peer Reviewers states that it will “be posted on the Website as well as promoted thru [sic] Ed Connections Newsletter, Ohio Ed Updates, Ohio Delivery, and emailed to all stakeholders...” • During the site visit, the OCS staff stated that the Call for Reviewers would be posted online and through two Department listservs, including one for authorizers. The OCS staff also indicated that they would ask their advisory committee to distribute it and consult with the committee to “help get ideas about who we should be targeting for peer reviewers.” <p>--</p> <p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. The ODE prepared a notification for potential grant reviewers for the Spring 2017 competition, <i>Grant Readers for Ohio’s CSP Grant</i>, explaining that the review process for its subgrant competition would include a technical review and a peer review, and stating its intention to establish an expert review team comprised of education stakeholders to score the subgrant applications using a detailed rubric with established criteria. The</p>

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>document describes that peer reviewers are selected on the basis of submitted qualifications, receive training to evaluate applications, and must be free of any conflicts of interest to ensure the scoring process is unbiased. More detail is provided in the document through several Q&As.</p> <p>The document specifies minimum and preferred qualifications for a peer reviewer:</p> <ul style="list-style-type: none"> • Minimum qualifications include, but are not limited to, background in one or more of the following areas of expertise: curriculum and instruction, law, governance, management, leadership, finance, school start-up, policy and community school operations. • Preferred qualifications include community school authorizing and accountability, community school policy, community school research and evaluation, community school development and implementation or community school grant administration. <p>The ODE publicized the notice widely, including sending it to all community school sponsors and existing community schools in the state, as well as previous grant readers. Other dissemination mechanisms included Ed Connections, reaching approximately 10,000 emails; and the ODE’s website, Twitter, and Facebook. The ODE staff stated that their strategy for communicating the call for peer reviewers was to try to reach every possible outlet. This included direct outreach by the OCS staff as well as network approaches such as asking the CSP Advisory Committee to disseminate the information. Out-of-state contacts were also included.</p>

Composition and qualifications of peer reviewers:

Ohio’s CSP application stated, “[Peer reviewers] will be recruited from among education practitioners in the state and will be screened for potential conflicts of interest.” “Each application will be scored by three reviewers.” (p. 54).

Not specified in application

- Yes
- No

March 2017 site visit:

Desired qualifications of peer reviewers: The ODE’s description was stated somewhat differently across sources:

- The draft AUPs state, “Peer reviewers must have direct community school and/or sponsorship knowledge and experience.”
- The draft Call for Reviewers states, “We are seeking peer reviewers from various professions and backgrounds with an understanding of the community school sector and expertise in at least

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
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one of the following areas: community school authorizing and accountability, community school policy; community school research and evaluation; community school development and implementation; or community school grant administration. Peer reviewers may have expertise in various geographies, including urban, suburban, and rural communities.”

- The draft Peer Review Application uses similar language to the Call for Reviewers but also mentions direct community school knowledge, and experience as a previous Community School Administrator. It asks applicants to self-assess their level of expertise in the 5 areas listed above (Community School Sponsoring and Accountability, etc.), as well as to provide a description of the applicant’s experiences, understanding, relevant experience, and skills.

Conflict of Interest: The treatment of any conflicts of interest among peer reviewer applicants was unclear at the time of monitoring:

- The draft AUPs stated, “[Peer reviewers] must...demonstrate no conflicts of interest related to the applicant, the applicant’s intended Management Company, the applicant’s sponsor, or any CSP subgrantee.”
- The draft Call for Reviewers warns that “if your organization intends to apply for a grant under any CSP competition, you may not be eligible to serve as a reviewer” and lists three other situations that would present a conflict of interest.
- During the site visit interview, two sets of conflict of interest questions for the Peer Reviewer Application were discussed—one in development by legal staff and one contained in the draft Application specific to the program. The ODE staff were not able to describe how an identified conflict would affect a reviewer’s potential selection or assignments.

Selection of reviewers: The draft AUPs refer to scoring the peer reviewer applications and vetting the applicants using additional information, with the intention of “[selecting] more reviewers than may be needed for the subgrantee applicant pool...” It is

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>unclear what additional information would be used, though the draft Peer Review Application contains a number of questions about prior monitoring experience on other ODE grants. During the site visit, the ODE staff stated that they did not yet have a process for how they would use the information collected through the peer reviewer applications to select peer reviewers. The OCS intends to have three reviewers for each application, but expressed that they feared they would not get any applicants. As peer reviewers had not been selected yet, the site visit team could not determine their actual composition and qualifications.</p> <p>--</p> <p>December 2017 site visit:</p> <p>This element had been addressed and was being implemented as necessary during the December 2017 site visit. Peer reviewer applicants submitted their application through a third-party vendor contracted by the state, who then submitted qualifying resumes to the ODE. The ODE convened a panel of 6-7 staff to review and score the resumes based on the minimum and preferred qualifications. Out of 59 resumes reviewed, the 20 with the highest scores were selected. All of those selected had charter school experience at a school, management company, or sponsor organization. All peer reviewers were external to the ODE.</p> <p>The ODE used four peer reviewers to score each subgrant application. Because of the small number of applications, ultimately only a total of four peer reviewers were used.</p> <p>The ODE screened the peer reviewers for conflict of interest at two points in the review process. A pre-review form was used to identify if the reviewer was affiliated with any of the applicants so that the reviewer could be removed from reviewing any applicant with which there was a conflict; a post-review form was also used to check if reviewers identified a conflict while reading the application.</p> <p>In addition to the peer reviewers, the ODE used a technical review panel to review applications for eligibility, allowable uses of funds, and application completeness. This panel was comprised of four the</p>

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>ODE staff with charter school or fiscal experience and was overseen by the OCS Director. Technical reviewers also completed pre- and post-review conflict of interest forms.</p>
<p>Reviewer guidance and training: Ohio’s CSP application stated, “Peer reviewers will be provided with an application evaluation rubric that will specify the criteria against which grants should be judged, and descriptors for awarding points for each criteria. Peer reviewers will be required to participate in a webinar that will review the criteria and discuss the scoring approach.” (p. 54)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>March 2017 site visit: The draft AUPs state, “Peer reviewer training will be offered at two different times and will include a common application review and scoring for calibration.” The draft Call for Peer Reviewers is less specific, indicating reviewers will need to participate in an orientation session by webinar of approximately two hours prior to evaluating applications. It also does not mention that a rubric with criteria will be provided to reviewers. During the site visit, the OCS described how reviewer training had occurred in the past but stated that the training for peer reviewers for the current grant was not yet developed.</p> <p>--</p> <p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. The ODE staff conducted a four-hour Skype training for the selected peer reviewers on Friday, June 16, 2017, the week before the application scoring. The trainers explained the scoring rubric – also published in the RFA and aligned to the Comprehensive Plan – with its criteria, descriptors, and points. The rubric addresses all required sections of the application plus the four competitive preference priorities of strategic replacement, high need location, educationally disadvantaged students, and proven educational model. The trainers used a scripted PowerPoint and responded to questions.</p> <p>Over the weekend of June 16-18, the peer reviewers were required to review and score a fictional CSP grant application created by the ODE designed to illustrate potential application strengths and weaknesses. On Monday, June 19th, department staff conducted a conference call with the peer reviewers to calibrate the scoring of the fictional application. On this call, the group reviewed the scoring of each criterion, including each reviewer’s scores and the ODE’s expectations. The selected peer reviewers then</p>

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Use of peer reviews to select applications for funding: Ohio’s CSP application stated, “The results of the peer review process will be compiled and analyzed. The ODE will define a minimum quality threshold for applications that will form a floor. Applications that have not reached the minimum quality threshold will not be funded. The ODE will fund applications largely based on points awarded by the peer review process. The ODE, however, will reserve the discretion to make awards that do not rely solely on points earned in the interest of meeting key geographic distribution objectives and to avoid any unintended concentrations of schools which could provide capacity in excess of need.” (pp. 54-55)</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>conducted the actual scoring of applications beginning on Tuesday, June 20th.</p> <p>In addition, the OCS conducted training for the ODE technical reviewers on the technical review checklist (also contained in the RFA). The CSP oversight committee reviewed the technical review group’s evaluation of the subgrant applications.</p> <p>March 2017 site visit: During the site visit, the OCS staff indicated that they expect to use a consensus process among peer reviewers to arrive at each applicant’s score. The OCS had not determined a cut score or the level of applications that would be funded. Staff expressed the expectation that most if not all of the applications received would score high enough to earn an award because only applicants with an effective or exemplary sponsor would be eligible.</p> <p>--</p> <p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. The ODE used the results of the technical and peer reviews to select applications for funding. Out of the nine applications submitted, six were rejected in the technical review process because they did not provide convincing evidence that the school would be implementing a high-performing charter school model.</p> <p>The peer reviewer scores were used to select the remaining applications for funding. Scores for the section review criteria and competitive preference points entered by the peer reviewers in the CCIP were processed by data managers to arrive at an average total score per application. The score analysis procedure, which includes removing outliers from the calculation, is described in the Comprehensive Plan.</p> <p>Page 76 of the RFA indicates that the ODE will determine annually the minimum threshold of total points earned (excluding points earned for Competitive Preference Priorities) in order to be recommended for funding. Further, the</p>

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Other: The application also noted the role that the Community Education Development Organizations (CEDOs) would play in selecting applications for funding: “The Department will partner with CEDOs in determining the priority for awards to eligible proposals. While maintaining complete quality control over the award process and grant use, the Department will allow CEDOs to prioritize awards among eligible applicants” (p.15).</p> <p>Ohio’s CSP grant application described a \$10.25 million recovery district reserve and how these applications would be selected: “\$10.25 million will be reserved for the creation of high-quality schools in any recovery district designated by the state. Recovery districts are established for persistently under-performing districts in academic emergency status for multiple years. The criteria used to judge these applications will be the same as those used for other applications. The only difference is that schools located in the territory of the recovery district will not be competing with proposals from other parts of the state. For this reserved amount, however, there will still be adherence to the minimum quality threshold...”.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p>Comprehensive Plan states that the quality cut score will be determined by natural breaks in the data at a level near 75 percent of the total available points or a minimum of 75 percent if there is no such natural break. All three applications scored by the peer reviewers were above 75 percent and were funded.</p> <p>March 2017 site visit: The OCS staff stated that they hadn’t thought about CEDO prioritization and were not sure if they would pursue this provision of the grant application.</p> <p>During the site visit, the OCS staff stated that they were not sure how they were going to proceed with the recovery district reserve provision of the grant application.</p> <p>--</p> <p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. As part of its Spring 2017 CSP subgrant application process, the ODE identified Needs Assessment Advisory Groups (NAAGs) in three of the state’s major urban areas and invited them to help define the competitive preference priorities for the urban area served by each. The ODE held a webinar to explain the opportunity and provided each group with academic data on schools geographically located in their associated traditional public school districts as well as a form to record their locally-defined preference priorities. Although the identified NAAGs declined to participate in setting the competitive priorities for this subgrant competition, they indicated an interest in participating in later rounds. The ODE staff stated they will continue to reach out to these three and additional groups for this purpose in later rounds.</p> <p>The ODE developed procedures for using the recovery district reserve funds described in its CSP grant application, wherein successful CSP subgrant applicants in school districts designated in academic distress would be funded from this reserve. The procedures are described on page 7 of the OCS’ May 2017 document, <i>Ohio’s CSP Subgrant Review and Award Process</i>. However, none of the subgrant applicants from the Spring 2017 competition were</p>

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		eligible to be funded from the reserve fund and it is unclear if there will be any future subgrant applicants who will be eligible. The OCS staff stated that the reserve will be maintained so that it will be there should there be a demand to use it.

Sources: *March 2017* *Ohio CSP Grant Application; Draft AUPs; Draft Call for Peer Reviewers; Draft Peer Reviewer Application*

December 2017 *Grant Readers for Ohio’s Charter School Program (CSP) Grant; Pre-Review Conflict of Interest Statement; Post-Review Conflict of Interest Statement; Peer Review Trainings Held by the Department; Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017); Ohio CSP Grant Administration Comprehensive Plan; Peer Review Scores and Comments for Independent Monitor; Technical Review Cover Sheets; Sample Decline Technical Letter; NAAG Webinar 4-19-17; Summary of Data Provided to the Needs Assessment Advisory Groups; Needs Assessment Advisory Group: Locally-Defined Preference Priorities; Ohio’s CSP Subgrant Review and Award Process*

Indicator 1.5: PROGRAM PERIODS. CSP subgrants awarded by the State do not exceed the maximum program periods allowed.

Table 1.5: PROGRAM PERIODS.		
CSP subgrants awarded by the State do not exceed the maximum program periods allowed of:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Award not more than 36 months, of which the eligible applicant may use —	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The ODE makes annual grants only. The grant periods are July 1 – June 30. CSP grants are anticipated to be made in 3 separate annual awards: planning (up to \$100,000), Year 1 implementation (up to \$350,000), and Year 2 implementation (up to \$250,000). A subgrantee receiving all three phases of CSP funding would receive awards totaling not more than \$700,000 and 36 months. -- December 2017 site visit: No changes were observed during the December 2017 visit; the ODE was still implementing this element as necessary. In addition, pp. 10-11 of the April 2017 RFA specifies the duration and types of subgrants. In the example given of a community school that has not yet opened for students and receives both planning and implementation awards, the award period would not exceed 36 months.
(A) not more than 18 months for planning and program design;	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The ODE makes annual grants only. CSP planning grants are anticipated to be made for one year (12 months) only. -- December 2017 site visit: No changes were observed during the December 2017 visit; the ODE was still implementing this element as necessary. Page 10 of the April 2017 RFA is clear that planning grants are for one year, not to exceed 12 months.

Table 1.5: PROGRAM PERIODS.

CSP subgrants awarded by the State do not exceed the maximum program periods allowed of:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
(B) not more than 24 months for the initial implementation of a charter school; and	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The ODE makes annual grants only. CSP implementation grants are anticipated to be made in two one-year awards: Year 1 implementation grants and Year 2 implementation grants. The total period of implementation funding for a subgrantee receiving both Year 1 and Year 2 implementation grants would not exceed 24 months. -- December 2017 site visit: No changes were observed during the December 2017 visit; the ODE was still implementing this element as necessary. Pages 10-11 of the April 2017 RFA makes clear that implementation grants are for community schools in their first and second years of operation. In the example given of a Year 1 Implementation Award, the school’s CSP funding period would not exceed 24 months. All three of the successful subgrantees received an implementation Year 1 subgrant for fiscal Year 2018 with the opportunity to receive a Year 2 implementation subgrant if quality and operational criteria are met.
(C) not more than 2 years (24 months) to carry out dissemination activities described in Section 5204(f)(6)(B).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).

Sources: *March 2017* Ohio CSP Grant Application, Request for Applications; Ohio Community Schools Program; Community School Application for a Planning/Implementation Subgrant (draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft; draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft for tech editing 02 24 2017)

December 2017 Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017); grant award letters to subgrantees

2. CHARTER SCHOOLS PROGRAM AND CHARTER SCHOOL QUALITY

One of the key goals of the CSP is to support and encourage the development of high-quality charter schools. To do so, the SEA needs to establish policies and practices that promote high-quality charter schools. This section focuses on how the SEA furthers high quality in authorizing practices and authorizer oversight, charter school flexibility and autonomy, subgrant assessment and awards, supporting educationally disadvantaged students, subgrantee monitoring, dissemination of best or promising practices, and assessing progress toward its own application objectives. It includes seven indicators that cover the State's role in:

- Providing for quality authorizer practices, including authorizer oversight and monitoring
- Affording charter schools a high degree of flexibility and autonomy
- Awarding CSP subgrants on the basis of the quality of the applications
- Assisting educationally disadvantaged students
- Monitoring subgrantee achievement of project objectives
- Disseminating information and best practices of charter schools
- Assessing its application objectives

Indicator 2.1: QUALITY AUTHORIZING PRACTICES. State laws, regulations, or other policies provide for quality authorizing practices, and the SEA monitors and holds accountable the authorized public chartering agencies in the state so as to improve the capacity of those agencies to authorize, monitor, and hold accountable charter schools.

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools		
Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>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.</p> <p><input type="checkbox"/> Not specified in application</p> <p>As noted in the grant application, authorizers are required to review the charter school's operations and its compliance with Federal and State laws and the terms of the contract. Required authorizer reviews include a pre-opening review; monthly reviews of financial and enrollment activity; twice annually comprehensive reviews; and renewal, termination/non-renewal, or suspension review. In addition, authorizers are required to provide ongoing monitoring of their schools' academic and operational performance.</p> <p>Separately, the ODE reviews authorizers through its Authorizer Quality Performance Review (AQPR). The AQPR evaluates</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Sponsors monitor the community schools' compliance with applicable laws and terms of the contract during the pre-opening monitoring visit conducted each July and August. Sponsors monitor and evaluate the fiscal performance and operation of the community schools through monthly reviews of financial and enrollment activity and twice yearly comprehensive reviews. Authorizers make written reports from school site visits available to the ODE, upon request. Further, OAC 3301-102-05 requires sponsors to send academic and fiscal performance reports to parents annually.</p> <p>Additionally, the SEA publishes an annual report on its community schools every year, as required by ORC 3314.016. This report is focused on: academic performance; sustained student enrollment; fiscal accountability; and sponsor accountability and oversight. Moreover, for all its public schools, the SEA has an annual report card, which includes a letter grade.</p> <p>The SEA's annual evaluation of community schools is published online and these reports go back to the 2003-2004 school year.</p> <p>--</p> <p>December 2017 site visit: While the ODE does not have authority to regulate authorizer practices, the State includes periodic review as an element on which it rates authorizers and has provided training on charter contracts that stresses high-stakes review as an expected practice. Additionally, the ODE has limited eligibility to CSP subgrants to developers from authorizers who conduct periodic reviews at least once every five years, in accordance with Absolute Priority 1. As the ODE was implementing this</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>the performance areas of agency commitment and capacity, application process and decision-making, performance contracting, oversight and evaluation, termination and renewal decision-making, and technical assistance.</p>		<p>restriction as necessary, the State is complying with the expectation for CSP despite the sponsor issues described below.</p> <p>The 2017-18 Sponsor Quality Practices Rubric, in C.02, evaluates sponsor contracts to verify high stakes reviews are occurring at least once every five years. The rubric assigns zero points (out of a possible 4 points) for authorizers that do not conduct this high-stakes reviews. A review of sponsor contracts by the site visit team showed that more than half of the eight new charter contracts executed to begin in the 2017-2018 school year had a term of six years. This sponsor was not conducting a high-stakes review every five years. Additionally, in authorizing a contract for longer than the sponsor agreement’s term, this sponsor was not in compliance with its sponsorship agreement with the State.</p>
<p>The State takes steps to ensure that the periodic review and evaluation at least once every five years takes place.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
<p><input type="checkbox"/> Not specified in application</p>		<p>March 2017 site visit:</p>
<p>In the grant application, the ODE proposed to evaluate authorizers annually on three components, one of which is quality practices. Quality practices include assessing the transparency of the charter contract, data-driven renewal and intervention decisions, annual and cumulative school reports, and a high-stakes review at least every five years.</p>		<p>The ODE evaluates sponsors annually on quality authorizing practices through the sponsor evaluation, as proposed. Specifically, the indicator, Contract Terms for Renewal and Non-Renewal, is in the Performance Contracting section of the evaluation. Sponsors must include academic performance measures in their contracts with community schools, which gives the sponsor the ability to terminate the contract and sponsors must conduct a high-stakes review at the end of the charter term.</p>
<p>The application notes that both law (ORC 3314.03) and rules (OAC 3301-05) require the annual evaluation of authorizers.</p>		<p>Initial community school contracts must not exceed five years in length (ORC 3314.03 (A)(k)(13) and upon renewal, may be for any length of time (ORC 3314.03 (E). Established schools may therefore not be subject to a high-stakes review at least once every five years if they are under a contract that exceeds five years.</p> <p>Furthermore, at the time of the site visit, although all sponsors were required to go through the sponsor evaluation process (i.e., all sponsors except those with schools open less than two years or with schools serving predominantly students with disabilities), there were varying degrees of accountability based on sponsor type. The SEA noted that sponsors receiving a poor rating would not be allowed to open new schools under the</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The review and evaluation 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</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>evaluation process; however, the SEA-operated sponsor was not subject to the same limitations but did note they exercised revocation proceedings on all charters rated as poor. All sponsors will be required to establish a contract with the ODE by July 1, 2017 at which time all sponsors will be held accountable for contract requirements.</p> <p>--</p> <p>December 2017 site visit: At the time of the visit, all but two sponsors were in a sponsor agreement with the ODE, and the ODE was able to ascertain which sponsors were conducting high-stakes reviews at least once per five years through the AQPR. The ODE was implementing this element as necessary.</p> <p>The two sponsors not under contract with the ODE were grandfathered in under statute and would not need to enter into a contract unless they fell into the ineffective category for two years in a row. In addition, the Office of School Sponsorship was not required to enter into a sponsor contract. However, this office is evaluated annually and subject to oversight and corrective action at the discretion of the OCS.</p> <p>In order for a sponsor’s schools to be eligible for a CSP subgrant, the sponsor must receive an overall rating of effective or exemplary on the sponsor evaluation and meet or exceed (scoring a 3 or higher) on the “Oversight and Evaluation: Site Visit Reports” and “Termination and Renewal Decision-making: Renewal and Non-renewal Decisions” standards in the Sponsor Quality Practices Rubric.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Sponsors hold their community schools accountable for meeting the terms of the school’s charter and meeting or exceeding the student academic achievement requirements and goals during renewal, termination/non-renewal, or suspension reviews. Tools used by sponsors to collect a body of evidence are pre-opening onsite visits; monthly reviews of financial and enrollment activity; twice annual comprehensive reviews; and renewal/non-renewal or suspension reviews.</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>by that policy meet or exceed those set forth under applicable State law or State regulation.</p> <p><input type="checkbox"/> Not specified in application</p> <p>As noted in the grant application, authorizers are required to review the charter school’s operations, compliance with Federal and State laws and the terms of the contract, and intervention and renewal decision-making.</p> <p>Required authorizer reviews include a pre-opening review; monthly reviews of financial and enrollment activity; twice annually comprehensive reviews; and renewal, termination/non-renewal or suspension review.</p> <p>The application states that authorizers are evaluated each year based on three components, one of which is quality practices. Quality practices assess transparency of the charter contract; data-driven renewal and intervention decisions; annual and cumulative school reports based on multiple sources of data; and a high-stakes review at least every five years.</p>		<p>A review by the site visit team of ten randomly selected community school contracts available on the SEA website showed that only 30% included performance metrics. The site visit team notes that the performance metrics in the charter contracts and the authorizer reviews based on them may not be sufficient to determine whether the charter schools are meeting the terms of their charters and meeting and exceeding the student academic achievement requirements of the law.</p> <p>--</p> <p>December 2017 site visit: The ODE was implementing this element as proposed. Authorizers are held accountable for using the periodic review to determine if charter schools are meeting the student and academic achievement goals of their contract through the annual evaluation process. Evaluation criteria are detailed in the Sponsor Quality Practices Rubric and are publicly reported each year. Sponsor evaluation results inform the contract between the ODE and the authorizer. The ODE staff reported that some sponsors revised contracts with schools in order to obtain a higher sponsor rating, by filing an addendum. Further, about 20 sponsors ceased sponsoring in 2017 rather than complying with new expectations for sponsors.</p> <p>A review of the eight new community school contracts executed this year reveals that performance measures are included in all contracts. Some contracts also note the metrics that will be used, benchmarks for different ratings, and performance targets.</p>
<p>This periodic review and evaluation must include an opportunity for the</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below).</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools		
Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>authorized public chartering agency to take appropriate action or impose meaningful consequences on the charter school, if necessary.</p> <p><input type="checkbox"/> Not specified in application</p> <p>As noted in the grant application, Ohio rule and law ensure that authorizers have a legal basis for taking appropriate action against a charter school, as necessary. Authorizer-school contracts must include a provision that authorizers can assume the operation of the school. Authorizers may place a school on probationary status, suspend the school’s operation, or terminate a school’s contract.</p> <p>The application also explains that in order for an authorizer to earn an effective or exemplary score on the quality practice rubric for the standard titled, Termination and Renewal Decision-making, Substandard: Contract Termination, the authorizer must terminate a charter school’s contract when there is evidence of extreme underperformance, an egregious violation of law, a violation of the public trust that jeopardizes students’ health and well-being or public funds, or</p>		<p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>Authorizers have the legal basis for taking appropriate action against charter schools as proposed in the grant application. A review of several pre-opening reviews, monthly review reports, and twice annually comprehensive reviews indicate that non-compliance with health and safety standards, failure to meet accepted standards of fiscal management, and violation of charter provisions could result in consequences including suspension of the school’s operation.</p> <p>Sponsors have the legal authority to take appropriate action against community schools, as proposed in the grant application. The SEA provided a spreadsheet with more than 100 community schools that have closed since 2011. This document includes components to determine if a sponsor is closing low-performing community schools. These components are: Contract Termination, Evidence-based Renewal, Cumulative Report on Performance, and Closure Process.</p> <p>--</p> <p>December 2017 site visit:</p> <p>There was no change noted during the December 2017 visit; the grantee was implementing this element as proposed.</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>unfaithfulness to the terms of the contract.</p> <p>Each charter school 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 authorizer.</p> <p><input type="checkbox"/> Not specified in application</p> <p>The application noted that ORC 3314.03 details what should be included in an authorizer’s contract with a charter school, which establishes the rights of both parties. This includes the authorizer’s obligations to the school and the school’s obligations to the authorizer.</p> <p>In addition, the application noted that school and authorizer rights are implicitly contained in contracts that include provisions for monitoring the school’s compliance, a description of the metrics and expectations for evaluating the school, and all laws with which the school must comply.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input checked="" type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Both program and legal staff at the ODE review initial and renewal contracts between the sponsor and community school for contract provisions required by law and legal compliance.</p> <p>In a random review of ten community school contracts available online conducted by the site visit team, the school and authorizer’s responsibilities were consistently included in contracts. However, explicitly noting rights of the parties is not required by statute or rule and were not found in the contracts that were reviewed.</p> <p>--</p> <p>December 2017 site visit: The eight new schools that opened in Fall 2017 are sponsored by two nonprofit authorizers. A review of the template contracts used by these two sponsors showed that neither entity includes rights of the parties in their contracts; however, responsibilities are included. Among these eight schools are all three of the current CSP subgrantees.</p>
<p>Charter schools conduct annual, timely, and independent audits of the school’s financial statements that are filed with the school’s authorized public chartering agency.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p><input type="checkbox"/> Not specified in application</p> <p>The application noted that ORC 117.10 requires an annual, independent financial audit of all charter schools. The authorizer is involved during the audit process and attends the exit conference with the school and the auditors. Each audit is shared with the school, authorizer, published to the Auditor of State’s website, and if material findings are noted, a notice is also sent to the ODE.</p>		<p>March 2017 site visit: Annual financial audits would be conducted by the State Auditor or a financial auditor retained by the charter school. ORC 3314.03 (A)(11)(g), effective April 16, 2017, requires the community school’s board to provide a copy of the school’s financial audit to their sponsor within four months of the end of the fiscal year. The ODE program and grants fiscal management staff review the audit reports, submitted to the electronic CCIP grants management system by the school’s sponsor, to verify compliance.</p> <p>--</p> <p>December 2017 site visit: No change was noted during the December 2017 visit; the grantee was implementing this element as proposed.</p>
<p>Charter schools are held accountable to demonstrate improved student academic achievement.</p> <p><input type="checkbox"/> Not specified in application</p> <p>The application stated that the sponsor evaluation process ensures that the State’s authorizers hold charter schools accountable for their schools’ academic achievement. Authorizers provide annual reports summarizing school performance through the sponsor evaluation instrument’s section on oversight and evaluation. Authorizers are also expected to establish measures for student proficiency, academic growth, graduation rates,</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: ORC 3314 lists contract requirements, which includes academic goals and performance metrics to monitor progress toward academic goals. Although the ODE reviews community school contracts for compliance with required components, it is not clear that the review process ensures that community schools are held accountable for demonstrating improved student academic achievement. A review of ten community school contracts conducted by the site visit team demonstrated a range of academic goals and performance metrics. A majority of which were either not included in the contract or appeared to be standard contract language that was not specific to the school (i.e., identical language used in multiple contracts reviewed).</p> <p>The SEA developed school report cards for community schools in 2009, as amended. During the transition to new State tests in mathematics and English language arts, Ohio suspended many of the consequences of the tests for 2014-15, 2015-16, and</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>attendance, and post-secondary enrollment (if applicable).</p> <p>In addition, Ohio’s charter schools are required to demonstrate improved academic achievement or face closure under State law. Report cards for general education charters are required by ORC 3314.02 while reports for dropout prevention and recovery charter schools under ORC 3314.017.</p>		<p>2016-17 school years, including closure of community schools for poor performance.</p> <p>Since the SEA relies on sponsors to ensure community school quality, there is the potential for a myriad of performance expectations to result in less than optimal results. The SEA should consider increasing the sponsors’ capacity to effectively hold charter schools accountable for demonstrating improved academic performance. The SEA may think about the benefits of providing model contract language and related training for sponsors.</p> <p>--</p> <p>December 2017 site visit: The grantee had addressed the issues described from the March 2017 visit and was implementing this element as proposed. A site team review of community school contracts for the eight new schools opened this year indicated that all contracts included at least a list of performance metrics. Some contracts had additional detail that benchmarked performance levels or included targets for performance.</p>
<p>All authorizers use student academic achievement for all groups of students as one of the most important factors when determining to renew or revoke a school’s charter.</p> <p><input type="checkbox"/> Not specified in application</p> <p>According to the application, whether by authorizer action or as a result of Ohio’s automatic closure law, charter schools in the state have closed for failing to demonstrate improved academic achievement. As Local Report Cards and their measures were phased in for Ohio schools from years</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: ORC 3314.07 lists four reasons a charter may not be renewed or revoked, including extreme underperformance, an egregious violation of law, a violation of the public trust that jeopardizes students’ health and well-being or public funds, or unfaithfulness to the terms of the contract.</p> <p>Because the SEA’s accountability law for school closures permits a safe harbor, the automatic closure law was suspended until report cards resume for the 2017-18 school year.</p> <p>--</p> <p>December 2017 site visit:</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>2012-2013 through 2014-2015, so too were elements evaluated for school closure. ORC 3314.35 requires automatic closure of schools earning a D or F in two of three consecutive years and fails to meet expected value-added gains.</p>		<p>The grantee was implementing this element as necessary at the time of the visit. Schools receiving a C or higher on the school report card are eligible for renewal consideration. Schools in safe harbor from automatic closure can still be closed under their community school contract.</p>
<p>The SEA monitors and holds accountable authorized public chartering agencies, so as to improve the capacity of those agencies to authorize, monitor, and hold accountable charter schools. (See Table 2.2c for detailed options.)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
<p><input type="checkbox"/> Not specified in application</p>		
<p>The application explained that the State’s annual evaluation of authorizers holds authorizers accountable through the potential removal of their ability to sponsor. The State’s evaluation includes a review of academic performance; sustained student enrollment; fiscal accountability; and authorizer accountability and oversight, as required by statute.</p>		<p>March 2017 site visit: As required by statute, all but a few sponsors must enter into a contract by July 1, 2017 with the SEA. The contract details sponsor standards and serves as the foundation for accountability. Through annual evaluation, if the sponsor does not meet these performance standards, the contract may be severed. As mentioned above, this process is new and still in its first year of implementation. After July 1, most sponsors will be required to comply with their sponsor contracts with the SEA and be included in the authorizer evaluation. At the time of the site visit, the SEA’s plan to hold authorizers accountable had not yet been fully enacted since State/sponsor contracts were not due until July 1, 2017. -- December 2017 site visit: The grantee continued to implement the element as proposed during the December 2017 visit. The State has codified its CSP grant program in a Comprehensive Plan, which includes sections on Sponsor Evaluation and Quality Control. Through the sponsor evaluation process, the ODE monitors which sponsors and their schools are eligible for the CSP grant.</p>

Sources: *March 2017* Ohio Revised Code; *Quality Practices Spreadsheet 2014-15*
December 2017 Ohio CSP Grant Comprehensive Plan; Request for Application-CSP; Sponsor Quality Practices Rubric; New Schools 2017-2018; Quality Document Upload Guidance-Preliminary

Table 2.1B: QUALITY AUTHORIZING PRACTICES Oversight of Authorizers.		
Oversight of authorized public chartering agencies	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Oversight of authorized public chartering agencies – 1) The SEA ensures that authorized public chartering agencies are seeking and approving charter school petitions from developers with the capacity to create high-quality charter schools;</p> <p><input type="checkbox"/> Not specified in application</p> <p>As noted in the grant application, criteria regarding the approval of petitions are covered in one of the six areas of the sponsor evaluation. Authorizers are expected to provide evidence of an applicant’s comprehensive application and capacity to successfully execute its plans. The review and approval process should include a detailed review of the written application, an in-depth interview with finalists, and a thorough background review of the applicant’s experience and capacity.</p> <p>In considering petitions, authorizers determine the extent to which there is: a clear and compelling mission and vision, a quality educational program, a sustainable business, an effective governance and management structure, and quality staffing. Applicants must explain any never-opened, terminated, or non-renewed school, while also documenting educational, organizational, and financial performance records based on all existing schools.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The sponsor evaluation process includes Application Process, Timeline, and Clarity of Directions; Application Depth; Rigorous Criteria; Reviewer Expertise; Protocols and Training; and Rigorous Decision-Making.</p> <p>The first sponsor evaluation findings were reported in Fall 2016 and quality improvement plans were submitted in December. These plans are nascent and have not yet demonstrated effectiveness.</p> <p>The ODE has consulted with NACSA and through State law has adopted NACSA’s <i>Principles & Standards for Quality Charter School Authorizing</i>, one of these standards is Application Process and Decision Making.</p> <p>--</p> <p>December 2017 site visit: The grantee was implementing this element as proposed during the visit. Additionally, the OCS had conducted a training for sponsors on the topic of best practices for quality authorizing in August 2017 and included a guest speaker with charter school authorizing expertise.</p> <p>The 2016-17 sponsor ratings released on November 14, 2017 included 2 exemplary, 21 effective, 13 ineffective, and 8 poor ratings. Of the 21 sponsors receiving a poor rating last year, only two are still sponsors. Both are currently utilizing the appeal process.</p>
<p>2) The SEA ensures that authorized public chartering agencies are approving charter petitions that incorporate evidence-based school models;</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input checked="" type="checkbox"/> Implementation issues identified (explain below).</p>

Table 2.1B: QUALITY AUTHORIZING PRACTICES Oversight of Authorizers.

Oversight of authorized public chartering agencies	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p><input type="checkbox"/> Not specified in application</p> <p>Criteria for the application (petition) process and related decision-making, though not using the term evidence-based models, assumes that the petition provides the kinds of information and data to support the education program proposed. For example, the criteria in the AQPR for application process and decision-making confirm that the authorizer’s application calls for an explanation of the academic impact of the proposed school model on the students and charter along with an explanation of the school’s curriculum, its alignment to the Ohio Standards and benchmarks, specific instructional materials to be used to implement the curriculum, and the process the school will follow to evaluate, review, and revise its curriculum on an annual basis. Data must include a needs assessment of the school’s target neighborhoods and student populations.</p>		<p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The sponsor evaluation process includes a review of criteria for the charter application process and decision-making, as proposed. However, the criteria do not require authorizers to provide information and data to support the education program as articulated in the ODE’s application. Sponsors are now working with NACSA to improve their application review process.</p> <p>The SEA hopes that by improving sponsor quality, more operators that have proven to be successful in other areas of the country will want to open community schools in Ohio.</p> <p>--</p> <p>December 2017 site visit: The grantee had implemented a new training for authorizers as of the December 2017 visit, but the rubric against which the State evaluates sponsors did not include the requirement that applicants explain and provide evidence for their school model. The Sponsor Quality Performance Rubric, in Indicator B.02, Rigorous Criteria for New Schools, required the applicant to describe seven areas of school planning and operations, as was demonstrated during the March 2017 visit, but it did not ask whether the applicant has an evidence-based approach.</p> <p>The ODE provided training for authorizers at the beginning of the 2017-2018 school year at which they utilized outside authorizer expertise. This training included conducting a high-quality application process.</p>
<p>3) The SEA ensures that authorized public chartering agencies are establishing measurable academic and operational performance expectations for all charter schools that are consistent with the State’s definition of a high-quality charter school;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p>

Table 2.1B: QUALITY AUTHORIZING PRACTICES Oversight of Authorizers.

Oversight of authorized public chartering agencies	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p><input type="checkbox"/> Not specified in application</p> <p>The application stated that the ODE reviews each charter contract to ensure legal compliance and that the ODE has developed examples of performance frameworks for use in charter contracts. The ODE has insisted authorizers update their contracts, if needed, with performance frameworks that are appropriate, comprehensive, measurable, and specific in their metrics, as well as in the consequences and benefits of achievements of those goals and outcomes. Moreover, the authorizer review process reviews the extent to which rigorous and measurable gains criteria are in use.</p>		<p>Program and legal staff review charter contracts to ensure compliance with contract requirements and applicable laws, as proposed. Further, the ODE has developed model performance frameworks that may be used in charter contracts and evaluates sponsors if they have used these performance measures. However, in a review of ten randomly-selected community school contracts conducted by the site visit team, only one had a specific performance accountability framework that would align with the SEA’s definition of high-quality charter school. Sponsors may need technical assistance to improve measurable academic and operational performance expectations in their community school contracts.</p> <p>The SEA and sponsors have begun to consult with external experts to improve academic performance, but that is at the beginning stage of development. The SEA will enter into performance agreements with sponsors by July 1, 2017 at which time the SEA will have more authority to influence expectations of sponsors.</p> <p>--</p> <p>December 2017 site visit: The grantee was implementing this element as proposed during the visit. Of the eight new school contracts executed in 2017, all included performance frameworks and some included specific metrics, benchmark levels, and performance targets.</p>

4) The SEA ensures that authorized public chartering agencies are monitoring their charter schools on at least an annual basis;

- Yes
- No

- Implementing as proposed or necessary (explain below).
- Implementation issues identified (explain below).
- Non-substantive changes in proposed activities (explain below).
- Promising practice(s) identified (explain below).

Not specified in application

The application stated that as required in ORC 3314.03(D), an authorizer must monitor and evaluate the academic and fiscal performance and the organization and operation of the charter school at least annually. Authorizers are also required to conduct comprehensive site visits at least

March 2017 site visit:
Authorizers monitor their charter schools through annual reports submitted to the SEA and verified during the sponsor evaluation process, twice annual comprehensive site visits, and a pre-opening onsite visit conducted every year. The sponsor evaluation process verifies that these monitoring activities take place through a representative

Table 2.1B: QUALITY AUTHORIZING PRACTICES Oversight of Authorizers.

Oversight of authorized public chartering agencies	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>twice annually and conduct an onsite review every year prior to the school’s opening.</p>		<p>random sampling of all sponsors. Required site visits are verified by program staff.</p> <p>--</p> <p>December 2017 site visit: No change was noted during the December 2017 visit; the grantee was implementing this element as proposed.</p>
<p>5) The SEA ensures that authorized public chartering agencies are basing renewal decisions on a comprehensive set of criteria which are set forth in the charter or performance contract; and revoking, not renewing, or encouraging the voluntary termination of charters held by academically poor-performing charter schools;</p> <p><input type="checkbox"/> Not specified in application</p> <p>The application stated that authorizers base renewal decisions on objective evidence as defined by the performance framework in the charter contract. In addition, authorizers only grant renewals to schools that are fiscally and organizationally viable based on criteria in the school’s performance contract, which includes rigorous and specific academic goals.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The sponsor evaluation process evaluates whether sponsors are basing renewal decisions on criteria set forth in the charter or performance contract, as proposed. Sponsors that do not meet the criteria are not explicitly ranked lower since the sponsor evaluation does not weight criteria. Sponsors that are rated ineffective or poor are subject to a quality improvement plan or revocation of their sponsoring authority. At the end of the 2016-17 school year, the first sponsors will lose their sponsoring authority due to under-performance.</p> <p>In addition, the SEA defines poor-performing for all public schools as those receiving a D or F on the school report card, according to ORC 3302.03. Charter schools that meet the SEA’s definition of academically poor-performing will be subject to the SEA’s automatic closure law after the 2017-18 school year as reiterated in ORC 3314.35.</p> <p>--</p> <p>December 2017 site visit: No change was noted during the December 2017 visit; the grantee was implementing this element as proposed.</p>
<p>6) The SEA ensures that authorized public chartering agencies are providing public reports on the performance of their portfolios of charter schools on an annual basis;</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p>

Table 2.1B: QUALITY AUTHORIZING PRACTICES Oversight of Authorizers.

Oversight of authorized public chartering agencies	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
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The application stated that ORC 3314.03 (D)(3) requires the authorizer to report the results of their school evaluations each year. These are published on the ODE’s website.

March 2017 site visit:
Sponsors submit their annual reports to the ODE; other school review reports are available upon request. These annual reports are published on the SEA’s website by sponsor.
--
December 2017 site visit:
No change was noted during the December 2017 visit; the grantee was implementing this element as proposed.

7) The SEA ensures that authorized public chartering agencies are supporting charter school autonomy;

- Yes
- No

- Implementing as proposed or necessary (explain below).
- Implementation issues identified (explain below).
- Non-substantive changes in proposed activities (explain below).
- Promising practice(s) identified (explain below).

Not specified in application

The application noted that each school is established as a public benefit corporation (ORC 1720), and in addition, the quality sponsor review process requires the authorizer to provide evidence that it grants autonomy to charter school governing boards in operations.

March 2017 site visit:
The Oversight and Evaluation area of the sponsor evaluation process requires sponsors to provide evidence of respecting governing authority autonomy in operations, as proposed. However, no evidence was found to demonstrate the majority of charter schools were operating with autonomy, and there is a potential issue with conversion charter school autonomy. A review of ten contracts demonstrated contract provisions that may compromise autonomy such as: 1) Required sponsor-provided financial services; 2) Required sponsor-provided special education services; 3) Mandatory leases for school district-owned properties; and 4) The mandatory employment of a school district employee as Superintendent for the community school. Furthermore, at least half of the contracts required the school to recognize the sponsor’s collective bargaining agreement. (Collective bargaining agreements in and of themselves are not an issue, but the requirement to use them may compromise a charter school’s autonomy.)
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December 2017 site visit:
The grantee had addressed the issue with autonomy limitations and was implementing this element as proposed. Following the adoption of HB2, the ODE anticipates fewer issues with conversion charter school

Table 2.1B: QUALITY AUTHORIZING PRACTICES Oversight of Authorizers.

Oversight of authorized public chartering agencies	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>8) The SEA ensures that authorized public chartering agencies are ensuring the continued accountability of charter schools during periods of transition to new State standards and assessments.</p> <p>The application explained that State law had made provision for the transition of assessment systems. District and school reports would continue to be generated. This allowed charter schools, in addition to all schools, to be held accountable for their performance during transition. Contracts must include provisions that charter schools will comply with academic performance requirements, including compliance with State assessments.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>autonomy. Since the last monitoring visit, the ODE had reviewed many community school contracts, in particular, conversion school contracts to ensure autonomy was present. Authorizers that were not in compliance were notified. As a result, the ODE staff anecdotally reported that many conversion schools were closing due to the new requirements in HB2.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The SEA considers community schools in the same manner as all public schools, accountable for taking the SEA assessment and publicly reporting the school’s results. School report cards have continued to be generated during the current transition to new State assessments, the last being generated for the 2015-16 school year.</p> <p>--</p> <p>December 2017 site visit: The grantee was implementing this element as proposed. Report cards for the 2016-17 school year had been released by the December 2017 visit.</p>

Sources: *March 2017 Ohio Revised Code; Review of Community School Contracts*

December 2017 Review of Community School Contracts and Operator Agreements; Sponsor Quality Practices Rubric; Ohio CSP Grant Comprehensive Plan; Request for Application-CSP; New Schools 2017-2018

Table 2.1C: QUALITY AUTHORIZING PRACTICES Authorizing and Monitoring.

High quality authorizing and monitoring processes (as applicable based on content in approved grant application)	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>High-quality authorizing and monitoring processes – All authorized public chartering agencies in the State use one or more of the following: 1) Frameworks and processes to evaluate the performance of charter schools;</p> <p>ORC 3314.03(A)(3) requires charter contracts to include “academic goals to be achieved and the method of measurement that will be used to determine progress toward those goals, which shall include the statewide achievement assessments.” ORC 3314.03(A)(4) requires “performance standards by which the success of the school will be evaluated by the (authorizer).”</p> <p>Ohio’s authorizers base the renewal process and renewal decisions on a comprehensive analysis of objective evidence.</p> <p>Clear violations of the law or public trust identified during site visits or through other means represent grounds for the termination/revocation of a charter, particularly as they apply to health and safety, governance, finance, operations, and education programs.</p> <p>OAC 3301-102-05 mandates that charter school authorizers make written reports from school site visits available to the ODE, upon request, and requires authorizers to send academic and fiscal performance reports to parents annually by November 30. Additionally, authorizers are obligated to submit annual performance reports to the ODE for their authorized schools under ORC 3314.03(D)(3).</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The sponsor evaluation instrument includes up to 24 compliance items under the categories Commitment and Capacity, Application Process and Decision-Making, Performance Contracting, Evaluation and Oversight, Termination and Renewal Decision-Making, and Technical Assistance and Sponsor Requirements in Rule and Law, as proposed.</p> <p>In the spreadsheet of 101 community school closures since the 2010-2011 school year provided by ODE, 11 of the closures were due to the closure law and 34 schools were ordered to close (e.g., contract noncompliance and nonviable finances). The rest of the schools closed voluntarily.</p> <p>Sponsors submit their annual reports to the ODE and other school review reports are available upon request. These annual reports are published on the SEA website under each sponsor.</p> <p>The adoption of HB2 requires sponsors to evaluate their community schools each year and the SEA conducts a legal review of community school contracts. A review of ten community school contracts showed that only one had an accountability framework to assess the quality of the schools.</p> <p>--</p> <p>December 2017 site visit: The grantee had addressed the lack of performance frameworks in contracts by the December 2017 visit and was implementing this element as proposed. A review by the site team of the eight community school contracts for schools opening in Fall 2017 showed that all had a performance framework in their contracts and that it was specific enough to provide evidence that the two parties had agreed on</p>

Table 2.1C: QUALITY AUTHORIZING PRACTICES Authorizing and Monitoring.		
High quality authorizing and monitoring processes (as applicable based on content in approved grant application)	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>an objective process to monitor community school performance.</p> <p>In addition, the SEA’s Comprehensive Plan explains how sponsors will be evaluated and rated in the Sponsor Evaluation and Quality Control section. Sponsor ratings are published on the ODE website each year.</p>
<p>2) Clear and specific standards and formalized processes that measure and benchmark the performance of the authorizer and provide for the annual dissemination of information on such performance;</p> <p>The grant application explained that the Quality Practices Component of the annual sponsor evaluation is based on six quality practices, which are aligned with NACSA’s principles and standards for authorizing. Three categories—agency commitment and capacity, application decision-making, and renewal and decision-making—are weighted. Possible ratings for the sponsor evaluation are exemplary, effective, ineffective, or poor.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).
<p>clear criteria for evaluating charter applications; or</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).
		<p>March 2017 site visit: ORC 3314.016 requires annual evaluation of sponsors and these reports are published online. The first sponsor evaluation ratings were made public in Fall 2016. The SEA contracted with a third party to conduct the evaluations, Although, sponsor evaluations are new to the SEA, the process has been implemented well and is strengthened by the fact that the criteria for evaluation are set in statute.</p> <p>--</p> <p>December 2017 site visit: No change was noted during the December 2017 visit; the grantee was implementing this element as proposed.</p> <p>March 2017 site visit: The SEA’s sponsor evaluation does not review the four areas of school planning and operations mentioned in the application. Reviewer Expertise and Protocols and Training are components of the sponsor evaluation; however, there was not sufficient</p>

Table 2.1C: QUALITY AUTHORIZING PRACTICES Authorizing and Monitoring.

High quality authorizing and monitoring processes (as applicable based on content in approved grant application)	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>and bring in others with specific knowledge, if needed. Authorizers are expected to train the reviewers on the use of the rubric, including rigorous criteria and differentiated scoring. The process calls for an applicant interview, additional due diligence in vetting, and engaging in data-driven decisions involving the authorizer’s board.</p>		<p>evidence presented to verify these components met the level of expectations specified in the application.</p> <p>--</p> <p>December 2017 site visit: The grantee had clarified expectations for reviewer qualifications but had not included the accountability plan in their authorizer evaluation. The Sponsor Quality Rubric, regarding new charter school applications in B.02, addresses the educational plan, governance and management structures, and a business plan as stated in the SEA’s grant application. However, an accountability plan is not included in the Sponsor Quality Rubric.</p> <p>B.04 addresses Reviewer Expertise and asks for reviewers to possess knowledge in the four areas mentioned in the application: education plan, governance, finance, and accountability.</p>
<p>4) Authorizing processes that include differentiated review of charter petitions for charter developers with one or more high-quality charter schools.</p> <p>The State’s application explained that the application and decision-making section of the sponsor evaluation establishes standards for authorizers in assessing petitions for new charter schools. Application requirements are expected to vary by type of applicant (existing charter operators, replicators, those seeking a different authorizer) in order to clearly capture the applicant’s history.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The SEA’s sponsor evaluation process includes a component for Rigorous Criteria for New Applicants, Including Any Affiliated with Previously Operating Schools.</p> <p>--</p> <p>December 2017 site visit: No change was noted during the December 2017 visit; the grantee was implementing this element as proposed.</p>

Sources: *March 2017 Ohio Revised Code; Review of Community School Contracts*
December 2017 Review of Community School Contracts and Operator Agreements; Ohio CSP Grant Comprehensive Plan; Request for Application-CSP; Sponsor Quality Practices Rubric; New Schools 2017-2018

Indicator 2.2: FLEXIBILITY AND AUTONOMY. The SEA affords a high degree of flexibility and autonomy to charter schools.

Table 2.2: FLEXIBILITY AND AUTONOMY.		
Areas for charter school flexibility and autonomy.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Budget/Expenditures: According to the grant application, Ohio’s charter schools are “exempt from all state laws and rules pertaining to schools, school districts, and Boards of Education, except those laws and rules that grant certain rights to parents.”</p> <p>The application stated that charter schools have autonomy over their own budgets. There is clear statutory language mandating autonomy; the State directly funds charter schools; the schools monitor their own potential conflicts of interest; and the governing boards have authority to make autonomous decisions regarding budgets and expenditures.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: ORC 3314.01 (B) states that community schools are public schools that are independent of the school district. The Community Schools Act requires a bonded fiscal agent (3314.011); compliance with standards of financial reporting (3314.042); recognizes the community school as a LEA (3314.082); and receives payments directly from the department (3314.08).</p> <p>In Ohio, charter schools are exempt from following Operating Standards (Ohio Administrative Code 3301-35-01 – 15) and some State laws but, in general, charter schools follow most of the same laws as districts – with additional requirements specific to charter schools. In addition to statutes included in ORC 3314, ORC 3314.03 lists school district statutes that also apply to Ohio charter schools.</p> <p>In statute charter schools have autonomy over their budgets and expenditures; however, in practice, conversion schools appear to have less autonomy. In a review of ten community school contracts there was evidence of the following requirements: 1) The school must use the sponsor’s financial services; 2) The school must use the district’s special education services; 3) The school must lease a district-owned property; and 4) The school must use a district employee as the school Superintendent. In addition, the financial autonomy of conversion community</p>

Table 2.2: FLEXIBILITY AND AUTONOMY.

Areas for charter school flexibility and autonomy.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>schools is in question when the sponsor’s board may appoint school board members, train these board members, and may assign district employees to the school, all of which were conditions that were found in the random sampling of community school contracts.</p> <p>--</p> <p>December 2017 site visit: This element was being implemented as necessary during the December 2017 site visit. Provisions are now in effect as a result of the HB2 and ODE training for authorizers on contract provisions and have positively impacted community school flexibility and autonomy. While the SEA has limited authority to influence sponsor-community school contracts, SEA staff noted that when a sponsor is deficient in sponsoring expectations, they are notified and, if necessary, a corrective action plan is established. The ODE has recently reviewed conversion school contracts to identify noncompliance provisions using the Internal Community School Contract Review Checklist 2016-17. As flexibility and autonomy issues are identified by the ODE, they are addressed on a case-by-case basis. These expectations are listed in the Comprehensive Plan on page 7.</p> <p>A random review of community school contracts revealed several schools have been closed since the March 2017 visit and none of the randomly reviewed contracts as a part of the December visit contained issues related to the flexibility and autonomy of community schools. All of the subgrantees visited indicated they had autonomy for their budgets and expenditures.</p>

Personnel:

The application stated that ORC 3314.04 exempts charter schools from all State laws and rules, except those delineated in the Community Schools Act. This means community schools are exempt from personnel laws and rules that pertain to all other public schools in the State.

- Yes
- No

- Implementing as proposed or necessary (explain below).
- Implementation issues identified (explain below).
- Non-substantive changes in proposed activities (explain below).
- Promising practice(s) identified (explain below).

Table 2.2: FLEXIBILITY AND AUTONOMY.

Areas for charter school flexibility and autonomy.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
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Not specified in application

March 2017 site visit:

Although clear autonomy regarding personnel is detailed in statute, in a random review of ten community school contracts, the conversion school contracts stipulated provisions such as the governing authority needed to recognize the sponsor’s collective bargaining agreement and in at least one contract the school did not have any employees in their budget and were required to reimburse the district for employees. In addition, one contract required the school to use a school district staff member as the school’s Superintendent and the position reported to the sponsor’s Board of Education. The site visit team notes that conversion schools may not have sufficient flexibility and autonomy over personnel decisions.

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December 2017 site visit:

This element was being implemented as necessary during the December 2017 site visit. Since the last monitoring visit, the ODE has explicitly communicated their expectations for authorizers to ensure flexibility and autonomy of personnel for their community schools, including conversion schools. The ODE also reviewed contracts of schools that met certain conditions (e.g., those that were established as a conversion school). This resulted in numerous authorizers being notified of noncompliance. Authorizers handled these notifications in a variety of ways including closure of the conversion school.

A random review of community school contracts revealed many conversion schools had closed and none of the contracts reviewed as a part of the December visit contained flexibility and autonomy issues. Similarly, hiring decisions for personnel were controlled directly by each of the subgrantees visited.

<p>Daily Operations: The application stated that charter schools are designated as LEAs; may acquire facilities; and have broad</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below).</p>
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Table 2.2: FLEXIBILITY AND AUTONOMY.

Areas for charter school flexibility and autonomy.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>contracting authority to obtain all services necessary for the operation of a school as permitted under ORC 3314.01(B).</p> <p><input type="checkbox"/> Not specified in application</p>		<p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: In the SEA’s draft RFA, the applicant must describe the degree of flexibility and autonomy with which they operate, which is above and beyond that afforded to traditional public schools within the district.</p> <p>In a review of ten community school contracts, the site visit team notes there were provisions in conversion contracts requiring the schools to use sponsor fiscal and special education services. In addition, two contracts required the lease of sponsor-owned properties.</p> <p>--</p> <p>December 2017 site visit: This element was being implemented as necessary during the December 2017 site visit. Contracts randomly reviewed by the site visit team as a part of the December 2017 visit did not reveal issues with restricted community school daily operations autonomy. Likewise, no issues were found with this flexibility and autonomy among subgrantees.</p>

Sources: *March 2017 Ohio Revised Code; Draft Ohio Department of Education; 2017 Public Charter School Program Planning & Implementation Grant RFA; Community School Contracts on the ODE Website; Community School Sponsor Websites*

December 2017 Community School Contracts on the ODE Website; Community School Sponsor Agreements on the ODE Website; Internal Community School Contract Review Checklist 2016-2017

Indicator 2.3: SUBGRANTEE QUALITY. The SEA awards grants to eligible applicants on the basis of the quality of the applications submitted.

Table 2.3: SUBGRANTEE QUALITY.		
SEA efforts to award grants on the basis of quality.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The SEA has criteria for subgrantee and application quality to assess CSP applicants and award subgrants:</p> <p>The application listed five competitive preference priorities: strategic replacement (10 points); high need location (8 points); educationally disadvantaged students (5 points); proven educational models (5 points); and dropout prevention and recovery (3 points). Additionally, the application listed twelve planning grant application criteria and six implementation grant application criteria for planning grant recipients who wish to apply for continued funding.</p> <p>For each of these criteria, applications were to be scored reflecting categories similar to those used by the U.S. Department of Education: “Not Addressed,” “Poorly Developed,” “Adequately Developed,” “Well Developed,” and “Fully Developed”. These categories were associated with score points ranging from “0” for “Not Addressed” to “4” for “Fully Developed”.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The current draft RFA does not align with the competitive preference priorities outlined in the SEA’s grant application. Additionally, the draft rubric that the SEA intends to use to evaluate subgrant applications does not include the five competitive preference priorities stated in the application. The final criteria for evaluation and potential weighted components in the rubric were still undetermined at the time of the site visit.</p> <p>--</p> <p>December 2017 site visit: This element was being implemented as necessary during the December 2017 visit. The RFA included the competitive preference priorities (Section K of the application narrative) as stated in the application. There are criteria for evaluating these preference priority points in the associated rubric.</p> <p>The OCS used this rubric in 2017 to evaluate subgrant applicants. This rubric uses a zero to four-point scale. Sections and points for each section include executive summary (4); subgrant goals, budget narrative, and evaluation methods (24); school community (12); educationally disadvantaged students (16); educational model (20); school goals (16); outreach and engagement (12); school personnel and external support (12); governance and management plan (12); and business capacity and continued operations (20).</p>

Table 2.3: SUBGRANTEE QUALITY.

SEA efforts to award grants on the basis of quality.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>How the SEA uses these criteria to review and award CSP subgrant applications:</p> <p>As noted in the grant application, peer reviewers will be provided with an application evaluation rubric that will specify the criteria against which grants should be judged, and descriptors for awarding points for each criterion. Each application will be scored by three reviewers.</p> <p>According to the application, the State will use a peer review process to score applications and determine a minimum score for fundable applications. In addition, local community education organizations will advise the ODE on grant awards.</p> <p>The application also stated the right to make awards that do not rely solely on points earned in the interest of meeting key geographic distribution objectives and to avoid any unintended concentrations of schools that could provide capacity in excess of need.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p>Nine subgrant applications were received from schools sponsored by two eligible sponsors. The rating system used is as proposed in the grant application.</p> <p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>There was a lack of consensus on the draft criteria and how these would be used to determine high-quality subgrant applications. A final tabulation of possible points and a cut score for funding was not finalized at the time of the visit. Furthermore, the OCS staff did not have a plan for consulting with community organizations about subgrant awarding decisions, as proposed.</p> <p>--</p> <p>December 2017 site visit:</p> <p>This element was being implemented as necessary during the December 2017 visit. In addition to the peer review cited in its application, the SEA used a technical review process to review applications it received in May 2017. Technical reviewers included the SEA personnel who used a checklist to determine the completeness of a school’s application and its eligibility to continue to the peer review process. The technical review process is detailed in two places: The State’s Comprehensive Plan and the Review and Award Process.</p> <p>In the May 2017 subgrant competition, nine applications were received and three met the quality criteria and standards to pass the technical review. The SEA staff noted that applicants who did not pass the technical review were able to explain their educational program</p>

Table 2.3: SUBGRANTEE QUALITY.

SEA efforts to award grants on the basis of quality.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The SEA demonstrates a high-quality process to determine the quality of the CSP applicant and application, including considering the review of the applicant during the charter authorization process (i.e. use of rubrics, hearings, rigor).</p> <p>Ohio will identify those authorizers that will be invited to work with developers on school applications for the CSP. Only authorizers that are rated “exemplary” or “effective” under the State’s quality evaluation criteria will be invited to participate. A meeting of invited authorizers will be held at the beginning of the project to review the grant criteria described above and to explain the State’s objectives under the CSP program. Authorizers will be solicited regarding their needs for assistance during the process of identifying high-quality development projects and putting together high-quality proposals. The ODE will provide assistance as appropriate and work collaboratively with authorizers to ensure a sufficient pool of strong proposals. Additionally, in partnership with NACSA, the ODE will develop a series of tools and trainings that will be made available to authorizers across the state. These materials and trainings will provide best practices and professional development throughout Ohio to ensure high-quality authorizing across the state, yielding high-performing charter schools.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>but could not substantiate that their model would meet the needs of their targeted student population. The SEA plans further technical assistance for schools not passing the technical review of their subgrant applications. There were nine subgrant applications submitted in 2017 and only three passed the technical review and underwent a peer review. All three of these subgrants were funded.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Under the evaluation system required by HB2, sponsors received a rating in Fall 2016. These ratings were lower than expected with none of the sponsors scoring Exemplary, 5 rated Effective, 39 rated Ineffective, and 21 of the sponsors rated Poor. As proposed, only developers working with sponsors rated Exemplary or Effective will be invited to submit subgrant applications. The OCS did not articulate a plan for collaborating with authorizers to ensure a pool of strong applicant proposals and at the time of the visit did not have plans to develop a series of tools or trainings to provide best practices and professional development throughout Ohio. -- December 2017 site visit: This element was being implemented as proposed during the December 2017 visit. The SEA conducted a series of training workshops and webinars to convey expectations for subgrant applications. Qualifying sponsors and their charter schools were invited to this training. Training webinars were posted to the ODE website. Additionally, the SEA staff noted that a quarterly meeting of sponsors, called the Sponsor</p>

Table 2.3: SUBGRANTEE QUALITY.

SEA efforts to award grants on the basis of quality.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<input type="checkbox"/> Not specified in application		Quality Network, is planned to enhance communication between sponsors and with the ODE.
<p>The State uses the Federal definition of <i>academically poor-performing charter school</i> or an alternative definition that is at least as rigorous and as noted in the approved grant application.</p> <p>In their application, the State committed to using the Federal definition for poor-performing charter schools for the CSP grant program.</p> <input type="checkbox"/> Not specified in application	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The SEA revised its definition of academically poor-performing charter school to align with recent legislative changes in State law. Ohio law now defines a poor-performing charter school as a school receiving a D or F on the performance index score and a score of D or F for the value-added progress dimension, on the most recent report card (Ohio Revised Code 3314.034). This modification was approved by ED. -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 visit; no changes were noted.
<p>The State uses the Federal definition of <i>high-quality charter school</i> or an alternative definition that is at least as rigorous and as noted in the approved grant application.</p> <p>The State’s application committed to using the Federal definition for high-quality charter schools in the CSP subgrant program.</p> <input type="checkbox"/> Not specified in application	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: For the purposes of this grant, the ODE is using the same definition for a high-performing community school that it is using as part of the SEA’s charter classroom facilities grant program, offered through the Ohio Facilities Construction

Table 2.3: SUBGRANTEE QUALITY.

SEA efforts to award grants on the basis of quality.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.

Table 2.3: SUBGRANTEE QUALITY.		
SEA efforts to award grants on the basis of quality.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>the Performance Index must meet either the equivalent of A, B or C or must have increased for the previous three years of operation.</p> <p>2. If the community school serves any combination of fourth through eighth grades, the overall value-added measure must meet the equivalent of A or B and the Performance Index must meet either the equivalent of A, B or C or must have increased for the previous three years of operation.</p> <p>3. 3. If the community school serves only a combination of kindergarten through third grades, the K-3 Literacy measure must meet the equivalent of A or B.</p>

Sources: *March 2017* *Ohio Revised Code; Community School Contracts on the ODE Website; ODE Letter to U.S. Department of Education dated November 18, 2015*

December 2017 *Community School Contracts on the ODE Website; Ohio CSP Grant Comprehensive Plan; Request for Application-CSP*

Table 2.3: SUBGRANTEE QUALITY Use and monitoring of definitions of academically poor performing and high quality charter schools.	
Usage and monitoring of definitions for academically poor performing and high quality charter schools.	Provide detailed narrative about the grantee’s current approach.
How and for what purposes does the State use the definition of academically poor-performing charter school?	<p>March 2017 site visit:</p> <p>If a charter applicant has performed poorly, the applicant would not be eligible for replication. Additionally, poor-performing community schools must obtain approval from the ODE before changing sponsors and the definition is used for the SEA’s automatic closure law.</p> <p>--</p> <p>December 2017 site visit:</p> <p>No change was noted during the December 2017 visit; the definition of academically poor-performing charter school was still being used in the same way.</p>
How and for what purposes does the State	<p>March 2017 site visit:</p> <p>There was no indication from the interviews with the ODE staff that the definition was operationalized.</p>

Table 2.3: SUBGRANTEE QUALITY Use and monitoring of definitions of academically poor performing and high quality charter schools.

Usage and monitoring of definitions for academically poor performing and high quality charter schools.	Provide detailed narrative about the grantee’s current approach.
use the definition of high-quality charter school?	<p>--</p> <p>December 2017 site visit:</p> <p>The SEA now uses a technical review process that includes a checklist tool to document whether an applicant has met certain criteria, including eleven eligibility criteria, one of which is if the applicant is planning or implementing a high-performing community school. The 2017 technical review process eliminated six of nine CSP subgrant applicants due to their inability to demonstrate the school would be a high-performing school with a track record of high-quality performance.</p>
How does the State monitor subgrantees and other charter schools to determine whether they are academically poor-performing or high-quality?	<p>March 2017 site visit:</p> <p>The SEA intends to use performance on the school report cards to determine whether schools are high-quality or academically poor-performing. Otherwise, the SEA’s programmatic monitoring is not developed at this time.</p> <p>--</p> <p>December 2017 site visit:</p> <p>The SEA’s new monitoring tool includes indicators for monitoring Indicators of Quality, including Quality Board Membership, Effective Board Functioning, Effective System of Leadership, Effective Professional Development, Culture of High Expectations, and Data-Driven Decision Making. In addition, in D.05 Performance Monitoring of the Sponsor Quality Rubric, sponsors are required to regularly monitor their schools’ academic performance. Sponsors that do not meet this requirement are notified via certified mail and put on a corrective action plan.</p>

Sources: *March 2017* ODE Letter to U.S. Department of Education dated November 18, 2015
December 2017 Sponsor Quality Rubric

Indicator 2.4: PLAN TO SUPPORT EDUCATIONALLY DISADVANTAGED

STUDENTS. The State is supporting educationally disadvantaged students as noted in the approved grant application.

Table 2.4: EDUCATIONALLY DISADVANTAGED STUDENTS		
Quality of the plan to support educationally disadvantaged students.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The SEA’s charter school program assists students, particularly educationally disadvantaged students, in meeting and exceeding State standards and reduces or eliminates achievement gaps for educationally disadvantaged students.</p> <p>The ODE will assist disadvantaged students in meeting and exceeding State standards through the AQPR’s emphasis on high-quality authorizing, which is expected to drive to the development of more high-quality schools. The ODE will also serve educationally disadvantaged students by increasing the number of high-quality schools and effective seats where they are most needed, primarily in the Ohio 8 districts, an alliance comprised of the Superintendents and Teacher Union Presidents from Ohio’s eight urban school districts (Akron, Canton, Cincinnati, Cleveland, Columbus, Dayton, Toledo, and Youngstown).</p> <p>CSP subgrantees will be held accountable for their results in reducing or eliminating achievement gaps through measures (annual measurable objectives) reported on the Local Report Card. Additionally, the Office of Quality School Choice (OQSC) will conduct a study of best practices for reducing achievement gaps and disseminate findings from the study to subgrantees including technical assistance, as needed, to support schools in the implementation of best practices.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: As proposed in the grant application, the ODE is encouraging high-quality authorizing through its sponsor evaluation process. At the time of the site visit, five authorizers were rated Exemplary or Effective and developers with agreements with those authorizers will be eligible to apply for CSP subgrants. It remains to be seen if the sponsor evaluation process will assist educationally disadvantaged students in meeting and exceeding State standards or if the CSP subgrant program will increase the number of high-quality schools and effective seats.</p> <p>Ohio’s school report cards contain a component for Gap Closing. These data are monitored and reported each year for all public schools, including community schools.</p> <p>The SEA’s focus for disseminating best or promising practices has been on strategies and techniques to improve its lowest-performing schools, in the Ohio 8 districts. Aligning with this focus and using the SEA’s rubric, the ODE will study subgrantee schools that are closing the achievement gap and distribute these findings along with all public schools.</p> <p>The ODE utilizes a statewide school improvement process that will also be used by community schools. An emphasis of this work is to improve</p>

Table 2.4: EDUCATIONALLY DISADVANTAGED STUDENTS

Quality of the plan to support educationally disadvantaged students.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Ohio’s strategies for reducing or eliminating achievement gaps are shown in several actions: The Ohio Improvement Process; funding changes (e.g., facility funds) which make additional resources available; and early learning and career and college readiness strategies, which drive academic improvement and close achievement gaps.</p> <p><input type="checkbox"/> Not specified in application</p>		<p>high schools, also a priority for the OCS. Community schools were included in the new Ohio Facilities Construction Commission, effective April 6, 2017.</p> <p>Most CSP grant materials have not yet been developed. There are priority points in the draft RFA for serving educationally disadvantaged students, but how these priority points will be applied in the grant review process has not been determined. There was not a specific plan for how the CSP grant would impact student achievement for educationally disadvantaged students.</p> <p>--</p> <p>December 2017 site visit: This element was being implemented as proposed during the December 2017 visit. The RFA includes optional Competitive Preference Points that place an emphasis on schools serving educationally or socioeconomically disadvantaged students in the State’s most challenged urban communities. Competitive Preference Points are awarded for Strategic Replacement (up to 10 points); High Need Location (up to 8 points); Educationally Disadvantaged Students (up to 5 points); and Proven Educational Model (up to 5 points).</p> <p>In addition, other components of the RFA, such as Educational Model, School Goals, and a Plan for Educationally Disadvantaged Students, address high-performing schools.</p>
<p>The SEA has a plan to ensure that charter schools attract, recruit, admit, enroll, serve, and retain educationally disadvantaged students equitably and in a manner consistent with IDEA and civil rights laws, as applicable.</p> <p>The Department’s notice of grant opportunity will require applicants to build into their proposals a plan for recruiting, enrolling, and retaining disadvantaged students. In their plans,</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p>

Table 2.4: EDUCATIONALLY DISADVANTAGED STUDENTS

Quality of the plan to support educationally disadvantaged students.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>applicants will be asked to explain how they expect to engage diverse populations during initial enrollment drives and throughout the grant period. Community outreach efforts will be consistent with Ohio statute and will describe promising practices for reaching underrepresented student populations and their families. Such practices may include orientations, mailings, and partnerships with community leaders and organizations.</p> <p>In a manner consistent with ODE’s plans to disseminate best practices for reducing achievement gaps, OQSC will disseminate best practices for recruiting, enrolling, serving, and retaining disadvantaged students, including practices employed by subgrantees.</p>		<p>The SEA’s draft notice of grant opportunity notifies applicants that the grant program prioritizes serving students who are educationally or socioeconomically disadvantaged. The notice does not explain that the applicant will need to submit a plan for community outreach efforts nor does it say that promising practices for recruitment should be used by the applicant.</p> <p>During interviews with the site visit team, ODE did not articulate a plan for the OCS to disseminate best practices for recruiting, enrolling, serving, or retaining educationally disadvantaged students.</p> <p>--</p> <p>December 2017 site visit: The SEA has implemented its plan to require subgrant applicants to describe how it will recruit, serve, and retain educationally disadvantaged students as part of the RFA. However, applicant responses to these required elements were not complete enough to allow ODE to assess the quality of applicants’ plans and their ability to meet the needs of this student population.</p>
<p><input type="checkbox"/> Not specified in application</p>		<p>The State’s RFA includes a prompt that asks the applicant to describe how outreach has been made to potential families and specifically asks about outreach to educationally disadvantaged student populations.</p> <p>Section D: Educationally Disadvantaged Students of the RFA asks the applicant to explain its plans for recruiting, serving, and retaining educationally disadvantaged students. The site visit team’s review of subgrant applications identified that applicants’ responses to this section were superficial. They did not mention specific staff, a connection to the school budget, how full-time and/or itinerant staff would serve students, what staff position had ultimate responsibility for servicing students with special needs, how student achievement data would</p>

Table 2.4: EDUCATIONALLY DISADVANTAGED STUDENTS

Quality of the plan to support educationally disadvantaged students.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The SEA encourages innovation in charter schools that are designed to improve the academic achievement of educationally disadvantaged students.</p> <p>As noted in the grant application, clear, comprehensive plans for innovation, designed to improve achievement for disadvantaged students, will be encouraged of every applicant. Ohio plans to award subgrants to applicants with a strong sense of best practices in charter school innovation, and how those innovations will meet the learning needs of targeted populations. One of the criteria used to evaluate CSP grant applications will be the innovativeness of the academic plan.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>inform decision-making, or other details that would clearly identify how applicants planned to operationalize these services effectively.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The draft RFA does not include plans for awarding subgrants based on innovativeness. Applicants are asked to explain the effectiveness of their proposed educational program, but not the program’s innovativeness.</p> <p>State staff articulated that by improving sponsor quality, they hope to attract high-quality schools that have been proven to be successful in other states. They believe a high-quality sponsoring environment will encourage operators to thrive, thereby increasing innovation.</p> <p>--</p> <p>December 2017 site visit: This element was being implemented as proposed during the December 2017 visit. The State’s RFA included a prompt for the applicant to address how innovative programs, interventions, and/or plans to support all populations of educationally disadvantaged students will be addressed.</p>
<p>The SEA has a plan to monitor all charter schools to ensure compliance with Federal and State laws, particularly laws related to educational equity, nondiscrimination, and access to public schools for educationally disadvantaged students.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input checked="" type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p>

Table 2.4: EDUCATIONALLY DISADVANTAGED STUDENTS

Quality of the plan to support educationally disadvantaged students.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>OQSC uses a CSP Grant Site Monitoring Form that includes performance objectives, action steps and benchmarks described in the subgrant application. Evidence, ratings, and actions needed are documented for each item. ODE will monitor compliance quarterly to ensure that applicable Federal requirements and performance goals are being met and that the expenditure of Federal funds is in accord with all applicable laws and regulations. Programmatic goals will also be reviewed to confirm that they have or are in the process of achieving objectives and are adhering to the program’s governing assurances. During the monitoring process, if a Corrective Action Plan (CAP) is required, OQSC continues monitoring activities to ensure that the school has successfully implemented the CAP. Failure to cooperate with OQSC’s monitoring efforts will result in early termination of the subgrantee’s award, including the return of any previously distributed funds.</p> <p>The previously mentioned CCIP is a unified grants application and verification system that consists of two parts: The Planning Tool and the Funding Application. It will be used to monitor subgrantees’ compliance by tracking goals, strategies, action steps, district goal amounts for all grants, budgets, budget details, and other related pages. Subgrantee applications are filed electronically in the CCIP, with all steps in the review and approval process documented. Any subgrantee that fails to adhere to their approved plans in the CCIP could face corrective action from ODE, up to and including the revocation and repayment of grant funds.</p>		<p>March 2017 site visit: At the time of the site visit, the grantee’s draft monitoring protocol did not include plans to ensure compliance with Federal and State laws related to educational equity, nondiscrimination, and access to public schools for educationally disadvantaged students.</p> <p>Sponsors are rated each year on three primary areas, which includes compliance with Federal and State laws. However, there was no plan in place to monitor compliance directly for CSP grant-funded schools.</p> <p>--</p> <p>December 2017 site visit: The State has monitoring protocols developed but they do not explicitly address educational equity, nondiscrimination, and access to public schools for educationally disadvantaged students. Similarly, the Sponsor Quality Practices Rubric does not explicitly address compliance in these areas. Other program offices at the State provide monitoring for some Federal and State laws, but evidence was not provided that this monitoring adequately ensures compliance with educational equity and nondiscrimination laws.</p> <p>The State has Grant Monitoring Rubrics and conducts a fall desk review and a Spring onsite visit for all subgrantees. This is in addition to standard monitoring through the CCIP and the Grants Fiscal Office. The monitoring tool includes indicators in the categories of program compliance, fiscal compliance, grant implementation, performance on goals and objectives, and quality practices (implementation rubric only). There is no indicator in the monitoring tool that explicitly addresses educational equity, nondiscrimination, and access to public schools for educationally disadvantaged students.</p> <p>Compliance with some Federal and State laws are monitored directly by the State through State accountability, financial, and other programs.</p>

Table 2.4: EDUCATIONALLY DISADVANTAGED STUDENTS

Quality of the plan to support educationally disadvantaged students.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<input type="checkbox"/> Not specified in application		<p>The State still indicated they plan to use a Corrective Action Plan if an issue is identified at any point during the monitoring process.</p> <p>The Grant Monitoring Rubric also includes an indicator that addresses a school’s compliance with the preliminary agreement and/or charter contract with its sponsor. The State relies on the school’s sponsor to ensure compliance with Federal and State laws, which are delineated in most charter contracts, and the State expects sponsors to ensure compliance during their onsite monitoring visits. However, the Sponsor Quality Practices Rubric by which the State assesses sponsors does not address sponsor oversight of compliance with Federal and State laws for educational equity, nondiscrimination, and access to public schools.</p>

Sources: *March Ohio Revised Code 2017*

December Request for Applications-CSP; CSP Grant Monitoring Rubric 2017

Indicator 2.5: SUBGRANTEE MONITORING. The SEA monitors subgrantee projects to assure approved grant and subgrant objectives are being achieved.

Table 2.5: SUBGRANTEE MONITORING.		
Elements of subgrantee monitoring.	Implementation Issue?	Detailed Information Describe components of subgrantee monitoring process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities
<p>Regularly monitor subgrantee projects (e.g., schedule for on-site and/or desk monitoring):</p> <p>As noted in the grant application, sponsors will conduct semi-annual reviews based on criteria and rubrics provided by ODE. These reviews will include the following components: compliance with State operational requirements; quality and success of the academic program; quality and success of operational management; and quality, stability, and soundness of financial management.</p> <p>The application further notes that the State plans to conduct yearly reviews of authorizer monitoring, conduct multiple visits to each CSP subgrantee, and require each subgrantee to provide project goals and performance measures that align with the subgrantee’s objectives in opening the school.</p> <p><input type="checkbox"/> Not specified in application</p>	<p>Yes</p> <p>No</p>	<p>March 2017 site visit:</p> <p>ODE monitors charter school authorizers through its sponsor evaluation process, as proposed. That process ensures that authorizers are conducting semi-annual reviews of charter schools and reports are provided to the SEA.</p> <p>The draft monitoring protocol contains a list of items that will be reviewed during the SEA’s desk reviews and fall and spring onsite monitoring. Financial audit reports will be reviewed annually. Each subgrant recipient will be considered high-risk and therefore monitored onsite twice a year. However, no monitoring schedule was proposed for desk reviews.</p> <p>--</p> <p>December 2017 site visit:</p> <p>The grantee was implementing this element as proposed during the December 2017 visit. The SEA has a monitoring rubric that it will use for fall desk and spring onsite reviews. At the time of the December 2017 visit, subgrantees had submitted the requested documentation needed for the desk review, but it had not been reviewed yet. The first onsite visits are planned for Spring 2018.</p> <p>ODE has defined a comprehensive monitoring plan that includes annual monitoring of all subgrantee schools each year they are receiving CSP funds. Monitoring visits will be conducted using the CSP Subgrant Monitoring Rubric.</p>
	<p>Select subgrantees to be monitored using a risk-based or other strategic approach in accordance with monitoring plan:</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p>March 2017 site visit:</p> <p>The grants fiscal management system provides a sophisticated risk-based analysis. The electronic system uses multiple components to analyze risk and make recommendations for monitoring.</p>

Table 2.5: SUBGRANTEE MONITORING.

Elements of subgrantee monitoring.	Implementation Issue?	Detailed Information Describe components of subgrantee monitoring process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities
<input checked="" type="checkbox"/> Not specified in application		It is anticipated that while the SEA’s CSP grant is considered High Risk, all CSP subgrantees will be monitored each year. Monitoring will include both fiscal and program staff. The monitoring tool and related policy have not been created by program staff. -- December 2017 site visit: The grantee continued to have access to the risk-assessment system as described from the March 2017 visit. Additionally, the grantee was in the process of monitoring all subgrantees as described above. The SEA had developed a monitoring plan that utilizes both program and fiscal staff.
Use trained monitors to monitor subgrantee projects in accordance with monitoring plan: <input checked="" type="checkbox"/> Not specified in application	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	March 2017 site visit: State staff reports that Grants Fiscal Management will have one designated staff member participate in all CSP subgrantee monitoring reviews and visits. The SEA plans for fiscal and program staff, working together on all monitoring, to train each other with their respective expertise. Program staff has not yet been determined. The monitoring plan, on the program side of the department, has not been developed and the components for monitoring training are not determined. -- December 2017 site visit: At the time of the December 2017 visit, a formal plan was not in place to train monitors, and monitoring was to be conducted by staff new to CSP. The new CSP Grants Manager and a new Grants Fiscal Management staff member were tasked with carrying out CSP subgrantee monitoring. There was no written plan for training staff to conduct monitoring visits. In the short term, ODE staff that previously worked with the CSP program will remain involved to provide mentoring and guidance to staff conducting the monitoring visits.
Systematic monitoring processes align with monitoring plan and allow the SEA to assess a subgrantee’s progress in meeting the performance objectives and other programmatic components outlined in subgrant applications:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	March 2017 site visit: At the time of the site visit, the grantee had developed a draft monitoring protocol. The protocol included a plan to assess each subgrantee’s progress in meeting its project goals and objectives by verifying data collected to determine progress. The draft includes plans to verify sponsor eligibility prior to and during the subgrant period; monitor and ensure compliance of the subgrantee during the project period; and enforce any Corrective Action

Table 2.5: SUBGRANTEE MONITORING.

Elements of subgrantee monitoring.	Implementation Issue?	Detailed Information Describe components of subgrantee monitoring process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities
<p>The application stated that ODE will require each subgrantee to provide project goals and performance measures that align with the subgrantee’s objectives in opening the school. ODE will evaluate these goals annually by requiring an annual report from the subgrantee. Inability to meet or exceed goals and performance measures will be taken into account when the subgrantee applies for the next year’s funding.</p> <p><input type="checkbox"/> Not specified in application</p>		<p>Plans that may be developed during fall and spring site visits.</p> <p>State fiscal management includes a statewide electronic grants management system with myriad features such as a monitoring dashboard, history log, document repository, communication tool, and compliance monitor. Information for the CSP grant must be supplied by program staff and had not been done at the time of the visit. Although the electronic system is comprehensive, its effectiveness is largely dependent upon program staff to input information needed to monitor subrecipients. Although some programmatic evidence was provided for planned monitoring, it was not fully developed.</p> <p>--</p> <p>December 2017 site visit: At the time of the December visit, the grantee was implementing this element as necessary. The CSP Grant Monitoring Rubric includes a section for Progress on Project Goals in which the SEA monitors the school’s implementation of project goals. There is also a section for Grant Implementation that evaluates the implementation of plans submitted with the subgrant application.</p> <p>Subgrantee schools submit requested documentation to the State in the CCIP and the monitoring tool includes a list of documents that should be submitted. The SEA has indicated a plan to allow for greater usability across grant programs within the CCIP that would reduce the paperwork burden on CSP subgrantees.</p>
<p>Systematic monitoring processes align with monitoring plan and allow it to assess a subgrantee’s fiscal control and fund accounting procedures (including program requirements and allowable costs):</p> <p>The State’s CCIP system is an electronic unified grants application and verification</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>March 2017 site visit: The SEA uses a sophisticated, electronic grants management system with experienced staff that created and continue to use the system. This system, the CCIP, is used for all State grants. The CCIP utilizes numerous mechanisms to ensure quality fiscal control and ensure grants fiscal compliance.</p> <p>Despite the advantages of the CCIP system, the site visit team notes the lack of staff with CCIP expertise within the OCS at the time of the visit. This poses a risk that information about CSP program requirements and</p>

Table 2.5: SUBGRANTEE MONITORING.

Elements of subgrantee monitoring.	Implementation Issue?	Detailed Information Describe components of subgrantee monitoring process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities
<p>system that consists of a Planning Tool and the Funding Application. It will be used to track goals, strategies, action steps, district goal amounts for all grants, budgets, budget details, and other related information. Any subgrantee that fails to adhere to their approved plans in the CCIP could face corrective action from ODE, up to and including the revocation and repayment of grant funds.</p> <p><input type="checkbox"/> Not specified in application</p>		<p>allowable costs may not be effectively managed and communicated to fiscal staff through the CCIP.</p> <p>--</p> <p>December 2017 site visit: Fiscal monitoring practices were being implemented as proposed during the December 2017 visit. The CSP Grant Program Monitoring Rubric contains a section on Fiscal Indicators in which policies such as conflict of interest, procurement, inventory control, and budget management policies are reviewed. School policies are uploaded for the desk review monitoring.</p> <p>Communication across the SEA has improved with the development of the Ohio CSP Grant Comprehensive Plan, in which various department staff worked collaboratively to document the process for CSP grant operations across departments. This, along with new staff members assigned to the CSP grant, have improved grant management.</p>

Monitoring processes include formal follow-up or corrective action plans for identified deficiencies:

- Yes
- No

According to the application, the State intended to follow-up with monitoring findings via two routes: 1) For issues identified by the authorizer, the authorizer will work with the school to either immediately rectify the compliance issue or to develop a corrective action plan that will lead to compliance in an expeditious manner; and 2) For issues identified through CSP subgrant monitoring, ODE will communicate with the authorizer in a similar process to rectify or create a corrective action plan. When a corrective action plan has been put into place, the

March 2017 site visit:
As proposed, ODE plans to rely on the community school’s sponsor to rectify compliance issues that may arise. This plan assumes the SEA and the sponsors have the capacity and appropriate staff needed to promptly identify these deficiencies and ensure issues are addressed in a timely manner. Program staff, not grants fiscal staff, would have the primary responsibility to ensure corrective action plans are addressed and monitored by the sponsors and schools. At the time of the visit, there were issues about the availability of appropriate staff and their capacity to assume these responsibilities with fidelity.

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December 2017 site visit:
During the December 2017 visit, ODE continued to plan to rely on the sponsor to rectify compliance issues identified. Additionally, ODE had developed a monitoring tool that communicates its expectations for subgrantee performance and explains the monitoring process. Schools have been provided the monitoring protocol and at the time of the visit, had submitted requested documentation. ODE staff reported already providing technical assistance to subgrantees as subgrantees prepared for the first desk review.

Table 2.5: SUBGRANTEE MONITORING.

Elements of subgrantee monitoring.	Implementation Issue?	Detailed Information Describe components of subgrantee monitoring process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities
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State’s future monitoring activity will include a review of the corrective action plan commitments. Schools will know that extended non-compliance will lead to termination of their charter.

The monitoring rubric contains a requirement for a corrective action plan if a subgrantee is not in compliance with reporting requirements. The grantee is hopeful that new staff and staff newly assigned to the CSP grant will positively impact the monitoring process, including following up on deficiencies through corrective action plans or through technical assistance.

Not specified in application

Sources: *March 2017* *Ohio Revised Code; Subgrantee Monitoring Protocol DRAFT*
December 2017 *Ohio CSP Comprehensive Plan; Request for Applications-CSP; Sponsor Quality Practices Rubric; CSP Subgrant Monitoring Rubric*

Indicator 2.6: DISSEMINATION OF INFORMATION AND BEST PRACTICES. The State disseminates best or promising practices of charter schools to each local educational agency in the State (as applicable).

Table 2.6: DISSEMINATION OF BEST OR PROMISING PRACTICES.		
Elements of dissemination of best or promising practices.	Implementation Issue?	Detailed Information Describe components of dissemination subgrants. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Dissemination subgrants		
Utilization of dissemination subgrants to identify and disseminate best or promising practices of charter schools to each LEA in the State: <input checked="" type="checkbox"/> Not applicable. The State is not issuing dissemination subgrants. <input type="checkbox"/> Not specified in application	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).
Dissemination of information and best practices strategy:		
Identification and selection of best or promising practices (including use of dissemination subgrants and other efforts, as applicable): <p>The application stated that the State will form and regularly convene a Charter School Promising Practices Dissemination Network, which will be led by ODE staff and coordinated by a steering committee. The steering committee will determine the “seal of approval” for best or promising practices from charter schools.</p> <input type="checkbox"/> Not specified in application	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). <p>March 2017 site visit: There is a plan to use the SEA’s definition of “best or promising” practices and dissemination information collected through the department’s school improvement efforts. Statewide best and promising practices conferences are planned for November 2017 and Summer 2018 and will be advertised through the department’s typical statewide network. The results of sponsor evaluations will inform which community school practices should be highlighted for dissemination.</p> <p>--</p> <p>December 2017 site visit: There is now a database of statewide performance data and a desire to use this data to identify best practices in content area and</p>

Table 2.6: DISSEMINATION OF BEST OR PROMISING PRACTICES.

Elements of dissemination of best or promising practices.	Implementation Issue?	Detailed Information Describe components of dissemination subgrants. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>grade level. These data will inform decisions on where additional technical assistance is needed.</p> <p>The School Improvement Institute will now include the OCS in planning future conferences and there will be expanded outreach.</p> <p>Community schools can affiliate with one of sixteen local Education Service Centers that identify best or promising practices in all public schools with a shift toward evidence-based practices.</p>
<p>Dissemination of best or promising practices of charter schools to each LEA in the State (including dissemination subgrants and other efforts, as applicable):</p> <p>The application detailed a dissemination plan for charter school best or promising practices. This plan provides further detail for the proposed steering committee previously mentioned. Special topics such as discipline, school climate, and racial and ethnic diversity were specified in the plan.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The SEA plans to disseminate best or promising practices statewide for all public schools. The steering committee, with representatives from LEAs that sponsor community schools, will oversee the dissemination of best or promising practices to LEAs, as proposed. The research and resources designated for dissemination will be housed in the SEA’s online resource center and the already-established network of Education Service Centers will be used to disseminate these best or promising practices. In addition, webinars and conferences, for which LEAs are already networked, will be used to disseminate practices.</p> <p>--</p> <p>December 2017 site visit: Community schools are fully integrated into the State system for disseminating best or promising practices. Education Service Centers continue to play the predominant role in distributing these best or promising practices to schools. For</p>

Table 2.6: DISSEMINATION OF BEST OR PROMISING PRACTICES.

Elements of dissemination of best or promising practices.	Implementation Issue?	Detailed Information Describe components of dissemination subgrants. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Ability to ensure that disseminated information reaches all LEAs in the State:</p> <p>The application explained that the State will identify and disseminate promising practices in a host of relevant educational and operational areas, paying particular attention to identifying promising practices relative to racial and ethnic diversity. In addition, the State will leverage the Ohio Education Research Center. The application stated that a detailed dissemination plan will be developed in the future.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>example, a community school Principal presented at the statewide conference, the School Improvement Institute.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The SEA plans to use: 1) It’s Ohio Educational Research Center to further refine data analysis, 2) The steering committee to develop a detailed dissemination plan, 3) Webinars and conferences already used by the SEA for all its public schools, and 4) Further identify practices through the CSP grant program.</p> <p>--</p> <p>December 2017 site visit: There was no change from the previous monitoring visit; this element was still being implemented as proposed.</p>

Sources: *March 2017* *N/A*
December 2017 *Community School Principal Presentation*

Indicator 2.7: ASSESSMENT OF PERFORMANCE MEASURE DATA. The State demonstrates appropriate data collection and interpretation strategies to meet its application objectives.

Table 2.7: ASSESSMENT OF PERFORMANCE MEASURES DATA.

Objective 1: (Problem Identification and Grant Setup) Provide high quality educational options to Ohio’s most disadvantaged students by stimulating the creation of high quality applications for the creation of new schools.

Performance Measure	Performance Measure Data Review	Notes
Performance Measure 1: The percentage of charter schools, opened prior to July 1, 2016, that are identified as poor performing --	<input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain)	March 2017 site visit*: This metric is included in the SEA’s annual performance report and school report cards. These data are confirmed by the SEA’s Data Governance Committee prior to release.
Percentage of community schools meeting or exceeding the standard of a combined score of B on all applicable graded measures: <ul style="list-style-type: none"> Value-Added (Overall, VA for Lowest 20%, VA for Students with Disabilities, and VA for Gifted) Performance Index Indicators Met Annual Measurable Objectives (AMO) K-3 Literacy Improvement 4-year Graduation Rate 5-year Graduation Rate Prepared for Success <i>Target: 80% of schools meet the standard on the overall performance component score or make improvement</i>	Data Quality/Interpretation Concerns: <ul style="list-style-type: none"> <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify) 	*At the time of the visit only a draft of these objectives and measures was available and the final was not yet approved. -- December 2017 site visit**: During the December visit, it was noted that not all community schools will have a school report card due to State policy specifications. This missing data may impede the State’s ability to assess this measure going forward. -- **All performance measures were revised and approved by ED as of April 5, 2017. Updated measures are listed below the double dash in the left column.
Performance Measure 2: The percentage of applications received that earns 75% or more total points on the application evaluation rubric. --	<input checked="" type="checkbox"/> No concerns with data quality or performance measure interpretation <input type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain)	March 2017 site visit: The application evaluation rubric has not been finalized. --
The percentage of applications (planning and implementation) received from eligible participants that earn 75% or more total points on the application evaluation rubric	Data Quality/Interpretation Concerns: <ul style="list-style-type: none"> <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Data not aligned with performance measure 	December 2017 site visit: All three funded subgrant applications scored 75% or above and will be reported in the next APR. Individual scores were 78, 88, and 93%.

Table 2.7: ASSESSMENT OF PERFORMANCE MEASURES DATA.

Objective 1: (Problem Identification and Grant Setup) Provide high quality educational options to Ohio’s most disadvantaged students by stimulating the creation of high quality applications for the creation of new schools.

Performance Measure	Performance Measure Data Review	Notes
Target: 80% of applications received 75% or more total points on the application evaluation rubric	<input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)	
Performance Measure 3: The percentage of eligible proposed schools awarded a CSP planning subgrant that earn 75% or more total points on the plan evaluation rubric that measures successful planning activities. --	<input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain) Data Quality/Interpretation Concerns: <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)	March 2017 site visit: The evaluation rubric to measure successful planning activities has not been finalized. -- December 2017 site visit: This measure is not applicable yet. All subgrantee applications were for implementation grants this year.
Target: 90% of awarded subgrantees earn 75% or more total points on the plan [sic] evaluation rubric	<input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)	
Performance Measure 4: Percentage of schools opened with CSP subgrant funds that are located in priority geographic areas and/or serving economically disadvantaged students --	<input checked="" type="checkbox"/> No concerns with data quality or performance measure interpretation <input type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain) Data Quality/Interpretation Concerns: <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (Specify)	March 2017 site visit: No schools have been awarded a subgrant at this time. However, this metric aligns with the SEA’s planned competitive preference priorities for its subgrant program, as proposed. This is defined as a “high needs location.” -- December 2017 site visit: This year’s funded subgrantee applications were from Columbus and Cincinnati, both high needs locations.
Target: 90% of the schools opened with CSP funds are located in priority geographic areas and/or serving economically disadvantaged students	<input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (Specify)	
Performance Measure 5: Percentage of students attending schools opened with CSP subgrant funds (planning and implementation) that are identified as economically disadvantaged or a racial minority --	<input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain) Data Quality/Interpretation Concerns: <input type="checkbox"/> Inconsistent units of measure over time	March 2017 site visit: The data in this performance measure are available through the SEA database. -- December 2017 site visit: The window for collecting these data closes in January at which time baseline data will be reviewed.

Table 2.7: ASSESSMENT OF PERFORMANCE MEASURES DATA.

Objective 1: (Problem Identification and Grant Setup) Provide high quality educational options to Ohio’s most disadvantaged students by stimulating the creation of high quality applications for the creation of new schools.

Performance Measure	Performance Measure Data Review	Notes
Target: 100% of the schools opened with CSP subgrant funds maintain a 60% or higher population of students who have been identified as economically disadvantaged or a racial minority.	<input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (Specify)	

Sources: *March 2017 CSP Grant Performance Measures Draft 1-24-17*

December 2017 CSP Grant Performance Measures – Final 2017-04-05

Objective 2: (Operationalizing the Subgrants) Stimulate the creation of high performing charter schools that operate successfully under the CSP program utilizing quality practices

Performance Measure	Performance Measure Data Review	Notes
Performance Measure 1: The percentage of charter school sponsors evaluated as Exemplary or Effective based on the legislatively required evaluation	<input checked="" type="checkbox"/> No concerns with data quality or performance measure interpretation <input type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain)	March 2017 site visit: The SEA must evaluate sponsors each year according to HB2 requirements. --
--	Data Quality/Interpretation Concerns:	December 2017 site visit:
Target: Annual increase in the percentage of community school sponsors evaluated as Exemplary or Effective leading to 75% by 2021	<input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)	There are currently 53%, or 24 out of 55 sponsors, earning the rating of Exemplary or Effective. This is more than last year.
Performance Measure 2: Percentage of schools that open under the CSP grant that scores 80% or more total points on the implementation rubric	<input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain)	March 2017 site visit: The implementation rubric has not been developed yet. Implementation subgrants are planned for Year 4 of the grant. --
--	Data Quality/Interpretation Concerns:	December 2017 site visit:
Target: 80% of applicable schools score 80% or more total points on the implementation rubric	<input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent units of measure over time	This will be reported in the April 2019 APR.

Objective 2: (Operationalizing the Subgrants) Stimulate the creation of high performing charter schools that operate successfully under the CSP program utilizing quality practices

Performance Measure	Performance Measure Data Review	Notes
	<input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)	
Performance Measure 3: The percentage of schools opened under the CSP grant that show improvement in their scores on the quality practices area of the CSP subgrant implementation rubric, show improvement in that area -- Target: 100% of the schools that open under the CSP grant but did not receive all points on the quality practice area of the CSP subgrant implementation rubric, show improvement in that area	<input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain) Data Quality/Interpretation Concerns: <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)	March 2017 site visit: Implementation subgrants are planned for Year 4 of the grant. The implementation rubric has not been developed yet. Data will be collected on the quality practices area, which will be quantifiable and discreet. -- December 2017 site visit: This will be reported for the first time in the 2019 APR.
Performance Measure 4: Percentage of schools operating under the CSP grant that achieves or exceed the report card related performance targets set forth in their contracts or are making improvement toward the identified targets -- Target: 80% of schools meet their identified performance targets or make improvement	<input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain) Data Quality/Interpretation Concerns: <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input checked="" type="checkbox"/> Other (specify)	March 2017 site visit: The performance targets in community school contracts are very extensive and should be narrowed down to manageable metrics that are predominantly consistent across contracts. The universe of metrics that must be collected under this measure’s current wording is vast because it includes all performance measures in community school contracts. -- December 2017 site visit: This will be reported in the 2019 APR after report cards are released in September 2018.

Sources: *March 2017 CSP Grant Performance Measures Draft 1-24-17*
December 2017 CSP Grant Performance Measures – Final 2017-04-05

Objective 3: Increased academic performance by students attending charter schools

Performance Measure	Performance Measure Data Review	Notes
Performance Measure 1: The percentage of charter schools identified as high performing --	<input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain)	March 2017 site visit: The SEA's annual performance report requires this metric and school report cards generate these data. --
Performance Measure 1: The percentage of community schools identified as high performing Target: 5% annual increase in the percentage of community schools identified as high performing	Data Quality/Interpretation Concerns: <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)	December 2017 site visit: High performing is defined as receiving an A or B on the school report card's performance index. This will be reported in the 2018 APR using report cards released in August 2017.
Performance Measure 2: The number of high-performing charter schools operating in the state -- Target: Annual increase in the number of high-performing community schools leading to a total of 400 high-performing community schools by 2021	<input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain) Data Quality/Interpretation Concerns: <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)	March 2017 site visit: This is generated by school reports and included in the SEA's annual performance report. -- December 2017 site visit: This will be reported in the next APR. Baseline data have already been collected.
Performance Measure 3: The percentage of charter school students attending high-performing schools -- Target: 70% of community school students are attending high-performing schools by 2021	<input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain) Data Quality/Interpretation Concerns: <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)	March 2017 site visit: These data are generated by school reports and included in the SEA's annual performance report. -- December 2017 site visit: Baseline will be reported in the next APR.
Performance Measure 4: By the end of the grant, the schools' ranking of	<input type="checkbox"/> No concerns with data quality or performance measure interpretation	March 2017 site visit:

Objective 3: Increased academic performance by students attending charter schools

Performance Measure	Performance Measure Data Review	Notes
<p>schools that opened under the CSP grant when compared to a group of public schools identified as having similar demographic characteristics are in the upper quartile of schools with similar demographic characteristics. (For each school, a comparison group will be identified using grade levels served, student demographic data and comparability of community characteristics of the district in which the charter school is located, etc. All schools in the identified comparison group will be ranked based on report card metrics performance index score, K-3 literacy improvement, annual measurable objectives, and four and five-year graduation rate</p> <p>--</p> <p>Target: 85% of schools opened with CSP subgrant funds are in the upper 25% of schools in their comparison group</p>	<p><input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain)</p> <p><input type="checkbox"/> Unable to assess (explain)</p> <p>Data Quality/Interpretation Concerns:</p> <p><input type="checkbox"/> Inconsistent units of measure over time</p> <p><input type="checkbox"/> Data not aligned with performance measure</p> <p><input type="checkbox"/> Inconsistent wording of performance measure over time</p> <p><input type="checkbox"/> Incomplete or missing data</p> <p><input type="checkbox"/> Other (specify)</p>	<p>The SEA will need to determine how to develop this measure and where and how it will be reported. This metric is currently not being used and since these objectives and measures are in draft form, will need to be approved by the SEA's Data Governance Committee. This comparable group metric is currently not in the SEA's annual performance report, but could be added according to staff.</p> <p>--</p> <p>December 2017 site visit: This measure was modified to make the timeframe clear.</p>

Sources: *March 2017 CSP Grant Performance Measures Draft 1-24-17*
December 2017 CSP Grant Performance Measures Draft 1-24-17; CSP Performance Measures – Final 2017-04-05

3. ADMINISTRATIVE AND FISCAL RESPONSIBILITIES

CSP grantees incur specific administrative and fiscal responsibilities under Federal law. This section focuses on the SEA's statewide strategy and vision for charter schools; its allocation, use and controls over the CSP grant funds and other Federal funds; and the State's associated responsibilities in administering the CSP grant. It includes indicators that cover the State's responsibilities to:

- Implement its State-level strategy and vision for charter schools
- Inform appropriate audiences about Federal funding for charter schools and ensure that charter schools receive their commensurate share of relevant funds
- Allocate no more than the allowable amounts of CSP funds for administration, dissemination, and revolving loan fund purposes
- Administer and ensure appropriate disbursement and accounting for CSP funds
- Monitor the proper use of CSP funds
- Ensure LEAs do not deduct funds for administrative expenses or fees except in certain circumstances
- Ensure the timely transfer of student records
- Maintain and retain records related to the CSP grant funds
- Comply with specific conditions imposed on the grant

Indicator 3.1: STATE-LEVEL STRATEGY AND VISION. The State is implementing its State-level strategy and vision as noted in the approved grant application.

Table 3.1: STATE LEVEL STRATEGY.		
Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>State’s strategy for using charter schools to improve educational outcomes for students results in the creation of high-quality charter schools and/or the closure of poor-performing charter schools.</p> <p><input type="checkbox"/> Not specified in application</p> <p>As noted in the grant application, Ohio’s overall state strategy for improving student academic achievement and attainment, including closing achievement and attainment gaps includes the following key components: 1) Academic content standards; 2) Statewide assessment; 3) High standard for high school graduation; 4) An accountability system; 5) Ensuring that all students can read at grade level by the third grade; 6) Intensive, ongoing system of support for the improvement of school districts and school buildings; 7) Performance standards; 8) Options for students through charter schools and scholarships that create educational options primarily for students who attend or would attend the state’s lowest-performing schools (ORC Chapters 3310 and 3314); 9) Fostering innovation through the “Straight A” innovation grant program (ORC 3319.57); and 10) An adequate and equitable level of funding for education through a combination of State and local funding sources (ORC Chapter 3317).</p> <p>According to the application, the State’s funding formula ensures the same basic level of financial support for charter and traditional public</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>As public schools, charter schools are included in Ohio’s overall State strategy for improving student academic achievement and attainment and closing achievement and attainment gaps. Similar to traditional public schools, charter schools may utilize State standards established by the State Board, must administer statewide assessments, and charter school students are held to same high school graduation requirements.</p> <p>During interviews with the site visit team, ODE noted that the resources for charter schools proposed in the application are provided or planned. The State portion of formula funds is the same for traditional public schools and charter schools, as noted in the application, and municipal school districts may seek voter approval to levy property taxes and share proceeds with a partnering community school located in the district if that school is authorized by an exemplary sponsor. At the time of the visit, only Cleveland Metropolitan School District had such a levy in place. Also, the first \$17 million of the Community Schools Classroom Facilities Grant Program has been awarded for the purchase, construction, reconstruction, renovation, remodeling, or addition to classroom facilities for high-performing charter schools. A second round of awards is expected. At the time the application was written, \$10.25 million of the CSP grant was earmarked as a</p>

Table 3.1: STATE LEVEL STRATEGY.

Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>schools. Beyond basic funding, charter schools can seek voter-approved tax levies statewide, so long as they are overseen by exemplary authorizers; the State’s most recent education budget set aside \$25 million for high-performing charter schools to use on facilities; and ODE is expanding the State’s Academic Distress Commission concept by providing supplemental sources of funding to charters in “recovery districts” overseen by these Commissions.</p>		<p>recovery district reserve to support the creation of high-quality charter schools in school districts in academic emergency status. For the purpose of the grant, applicants located in the territory of a school district supervised by the State Superintendent of Public Instruction under an Academic Distress Commission will be eligible for subgrant awards under the reserved amount.</p>
<p>The Ohio Community Collaboration Model for School Improvement (OCCMSI) is an ODE-led initiative that was created to provoke collaboration between charter schools and other public schools, with specifically designed programs and services that feature strategies for academic improvement, youth development, parent/family engagement, health and social services, and community partnerships.</p>		<p>During interviews with the site visit team, ODE confirmed its commitment to collaborating with community organizations though staff no longer anticipate that partners will determine funding priorities and do not engage with community groups, as proposed. Instead, staff envision collaborating with partners to vet best or promising practices of subgrantee schools. ODE did not describe other ways it is currently collaborating with community organizations to support the development of high-performing charter schools and future collaboration is in the early development phase.</p> <p>--</p> <p>December 2017 site visit: ODE had addressed the lack of CEDO engagement from the March 2017 visit and was implementing its strategy as proposed during the December 2017 site visit. Additionally, two additional efforts were under way: a statewide strategic planning process on achieving educational outcomes and the introduction of community schools as presenters as the State’s School Improvement Institute.</p>
<p>As proposed in the application, the ODE will collaborate with Community Education Development Organizations (CEDOs) including partnering with CEDOs in determining the priority for awards to eligible proposals. The Cleveland Transformation Alliance (CTA) is a CEDO that ODE has been working with for the past two years. CTA promotes the development of high-performing district and public charter schools in the area. ODE is committed to expanding CTA strategies into all of Ohio’s urban districts and, in doing so, significantly increasing the number of high-quality schools in those areas.</p>		<p>ODE staff reported that the State is currently engaged in a strategic planning process around achieving educational outcomes, regardless of the type of school a student attends. Begun in September 2017 and expected to continue through March 2018, the process involves gaining input through stakeholder meetings and focus groups to adjust the State’s plan to make it more current and relevant. ODE noted that they have not begun to address the strategy aspect yet, and this is probably where charter schools will play a role.</p>

Table 3.1: STATE LEVEL STRATEGY.

Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Additionally, the State Superintendent is empowered to put in motion complete redesigns of chronically underperforming traditional school districts. The State’s plan for a recovery district will rely on replacing current failing traditional public and charter schools with high-performing charter schools and developing new K-12 pyramids of charters schools. The first recovery district will be formed in Youngstown.</p>		<p>Best practices of charter schools and traditional public schools were shared at ODE’s recent School Improvement Institute, an annual statewide conference of teachers and administrators. For the first time the conference invited high-performing community schools as well as traditional public schools to present, and two community schools did. ODE expects this opportunity for sharing best practices to increase as the conference expands in the future.</p>
<p>Statewide <u>vision</u> for charter school growth and accountability results in the creation of high-quality charter schools and/or the closure of poor-performing charter schools.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
<p>Ohio’s goal for charter school growth and accountability is to grow to 400 schools and for 70% of charter students to be in high-performing schools by 2021.</p>		<p>March 2017 site visit:</p>
<p>Charter schools submit student achievement, attainment, retention, and discipline data to the State through the Education Management Information System (EMIS). Collected and processed data are used to populate an annual report card for each school. The report focuses on four main areas of charter school</p>		<p>During interviews with the site visit team, the ODE confirmed its goal to increase the number of high-quality charter schools through high-quality authorizing. The grantee expects that rigorous charter authorization application processes will result in the creation of high-quality charter schools. The grantee acknowledged that its pipeline will be greatly reduced due to the limited number of eligible sponsors. Only applicants of the five authorizers</p>

Table 3.1: STATE LEVEL STRATEGY.

Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>performance: academic performance; sustained student enrollment; fiscal accountability; and sponsor/authorizer accountability and oversight.</p> <p>A key component to Ohio’s vision is the creation of high-quality charter schools. The key components of the plan are as follows: 1. Increase levels of high-quality authorizing, 2. Hold authorizers accountable for supporting schools in becoming or maintaining high-quality status, 3. Target Federal Charter School Program funds to support the creation of new high-quality schools, through replication of already proven models, and 4. Impose strict criteria and exercise quality control over authorizers’ actions to open new schools.</p> <p>The key components of the State’s plan to support school closure are: 1. Hold authorizers accountable through the AQPR for making effective termination decisions, and 2. Automatic closure law.</p> <p><input type="checkbox"/> Not specified in application</p>		<p>rated effective will be eligible to apply for the first round of CSP subgrants. Authorizers rated Ineffective will be required to submit a quality improvement plan. Authorizers rated poor have their authority to sponsor charter schools revoked, subject to an appeals hearing.</p> <p>The ODE did not articulate a clear plan for targeting CSP funds to support the replication of proven models.</p> <p>At the time of the site visit, Ohio was in the third year of a three-year safe harbor on closures under the automatic closure law so no overall letter grades of charter schools had been issued. When graded report cards resume in 2018, performance data from the two years prior to safe harbor will be used in conjunction with the most recent data to establish the three consecutive years of low performance required under statute.</p> <p>One provision in HB2 is designed to eliminate “sponsor hopping” by preventing poorly performing community schools from switching authorizers without the ODE approval. This provision should make school closures more effective.</p> <p>--</p>
		<p>December 2017 site visit:</p> <p>At the time of the December 2017 site visit, the ODE was implementing its vision as necessary though the CSP pipeline continued to be restricted due to the small number of sponsors meeting the CSP-eligibility standards. The ODE released its sponsor ratings for the 2016-17 school year just before the December 2017 site visit. These ratings, released November 14, 2017, included 2 exemplary, 21 effective, 13 ineffective, and 8 poor sponsors. Eligibility for CSP subgrants mandates that charter schools’ sponsors must receive an overall rating of effective or exemplary and meet or exceed (scoring a 3 or higher) the “Oversite and Evaluation: Site Visit Reports” and “Termination</p>

Table 3.1: STATE LEVEL STRATEGY.

Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>and Renewal Decision-making: Renewal and Non-renewal Decisions” standards on the Sponsor Quality Practices Rubric. Only one sponsor met this standard at the time of the site visit which will limit the number of new schools eligible to apply for CSP subgrants under the ODE’s current policies.</p> <p>Overall, since the March 2017 site visit the total number of charter schools in the state decreased from 362 to 340, and the number of charter school closures since 2000 increased from 233 to 260. Further, 2016-17 was the last year for safe harbor on closures under the automatic closure law. At the time of the site visit, the ODE was putting together the list of additional charter schools that could be subject to automatic closure.</p> <p>The ODE staff stated that their goal was to do more outreach to try to attract more charter school developers to Ohio and, particularly, to academically distressed districts. The ODE was implementing its plan to create high-quality charter schools but the immediate impacts of closures and more rigorous sponsor ratings may pose a challenge to reaching the goal of 400 charter schools by 2021.</p>
<p>The State utilizes its logic model to guide grant administration and implementation as well as to determine progress.</p> <p><input type="checkbox"/> Not specified in application</p> <p>The grantee submitted a logic model in its application with the appropriate inputs, activities, outputs, and outcomes that 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.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: During interviews with the site visit team, the grantee acknowledged that it has not utilized its logic model to guide grant administration and implementation.</p> <p>--</p> <p>December 2017 site visit:</p>

Table 3.1: STATE LEVEL STRATEGY.		
Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The management plan is implemented to achieve proposed objectives on time and within budget.</p> <p><input type="checkbox"/> Not specified in application</p> <p>In its grant application, the ODE proposed to hire 3.75 FTE employees to supplement current office staff, including a Director of Quality Charter School Development, Program Administrator, Program Specialists, and Data Manager.</p> <p>Additionally, the application included a work plan that described key strategies for successful implementation of the project along with actions, responsible staff, milestones, and timelines. Key strategies included – Strategy 1: Disseminate information about the CSP grant program to interested parties including potential developers, authorizers, teachers, parents, communities and other stakeholders; Strategy 2: Conduct subgrantee award rounds for planning, year one implementation and year two implementation grants; Strategy 3: Monitoring and technical assistance (TA)/support activity; and Strategy 4: Data collection, analysis and synthesis.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p>Staff interviewed during the site visit indicated they were not utilizing the logic model for grant administration. In the State’s response to the monitoring report, they documented how they aligned resources and activities to the logic model to guide grant implementation.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: At the time of the site visit, all work on the grant was being done in kind. Staff have been assigned tasks but no new staff were hired. (Subsequent to the site visit some additional staffing changes were made.) The ODE could not provide the FTE of staff assigned to the grant.</p> <p>The ODE provided an updated work plan as part of the document request for the site visit. The Data Governance Committee was added to the work plan. The Data Governance Committee was established in response to eSchools and dropout prevention and recovery schools not being included in performance reports. The committee meets regularly to review any data that the ODE uses or publishes to ensure the quality of the data. Two items were removed from the work plan: Conduct the ODE monitoring review and TA/support activities, and the ODE review of authorizer compliance with monitoring and TA/support requirements. The ODE staff believed they were removed inadvertently.</p> <p>--</p> <p>December 2017 site visit: The ODE has made significant strides in executing its grant since the March 2017 site visit, no implementation issues were present during the December 2017 visit. The OCS</p>

Table 3.1: STATE LEVEL STRATEGY.

Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>increased its staff capacity by hiring and onboarding a new Grants Manager and restructuring other positions. It held a first subgrant competition and awarded three subgrants which were ongoing. Staff stated that they are working with ED to begin a second round of the competition.</p> <p>The ODE has worked closely with ED to accomplish this work. ED’s oversight has included setting and monitoring progress on several high-risk conditions of the grant (discussed in Indicator 3.9), as well as a corrective action plan, and providing other intensive support such as weekly meetings and approvals of documents. Key to the ODE’s progress has been the development of a Comprehensive Plan for administering the grant and a Gantt chart for tracking progress on the high-risk conditions, both required by ED (see Indicator 3.9 for additional detail). Developing the Comprehensive Plan has required the ODE to think through and align all the parts of its CSP grant program, while the Gantt chart has put timelines on accomplishing activities. The ODE staff stated that the Comprehensive Plan is “like our bible,” and that they also use the Gantt chart as a management tool to stay up to date on timelines.</p>

Sources: *March 2017* 2015 CSP Grant Application; ODE website; Commission Awards Community School Facility Grants Press Release; Ohio Facilities Construction Committee website; ODE Letter to ED dated November 18, 2015

December 2017 Ohio CSP Grant Administration Comprehensive Plan; Ohio High-Risk Condition Gantt Chart; ODE Corrective Action Plan

Indicator 3.2: FEDERAL PROGRAMS AND FUNDING. The State informs appropriate audiences about the SEA’s charter school grant program, Federal funds that the charter school is eligible to receive, and Federal programs in which the charter school may participate, and ensures that each charter school in the State receives its commensurate share of Federal education formula funds.

Table 3.2: FEDERAL PROGRAMS AND FUNDING.		
Responsibilities of the SEA to inform and ensure access to Federal programs and funding.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Inform teachers, parents, and communities of the State educational agency's charter school grant program:</p> <p><input type="checkbox"/> Not specified in application</p> <p>The application specified that the ODE will develop a dissemination and engagement plan to guide communication with key stakeholders including potential developers, authorizers, teachers, parents, and communities. Information will be posted on the ODE website, and disseminated through print, radio, and television outlets, and through relationships with local partners (e.g., advocacy and social service organizations). In addition, unspecified outreach will be directed to parents and communities.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Thus far, information about the ODE’s grant application and correspondence with ED has been posted on the SEA website and a CSP-specific website that provides information about grant opportunities has been drafted but is not yet live.</p> <p>The ODE has not yet developed a dissemination and engagement plan to guide communication with key stakeholders. The AUP document indicates that public notice will be disseminated through direct email, the ODE’s Ed Connections Newsletter, the ODE Updates, the SEA website, and through posting on social media (e.g., Twitter, Facebook, etc.). While these strategies were outlined in the AUP document, the OCS staff did not describe how information will reach all relevant stakeholder groups such as parents and community members beyond who is reached through listservs and postings on the SEA website.</p> <p>--</p> <p>December 2017 site visit: By the December 2017 visit, the ODE had developed and implemented a dissemination and engagement plan to ensure interested parties were aware of the CSP grant opportunity.</p>

Table 3.2: FEDERAL PROGRAMS AND FUNDING.

Responsibilities of the SEA to inform and ensure access to Federal programs and funding.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Inform each charter school in the State about Federal funds that the charter school is eligible to receive:</p> <p><input type="checkbox"/> Not specified in application</p> <p>The application indicated that the ODE will hold annual seminars to notify charter and traditional districts about Federal entitlement funding opportunities. Discretionary grant opportunities will be publicized in the Superintendent’s weekly newsletter, webinars, and in the Comprehensive Continuous Improvement Plan (CCIP) system.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>In addition to posting the SEA’s grant application and correspondence with ED on the SEA website, the ODE developed and launched a CSP-specific website that houses the notice of grant opportunity, RFA, information on the application process, information on the review and award process, application forms and templates, application training videos, an allowable costs guide, and frequently asked questions. To raise awareness about the CSP grant opportunity, the OCS arranged for announcements to be sent out via email distribution lists (e.g., community school and sponsor distribution lists, Ohio Education Directory System distribution list) and posted on social media (i.e., Facebook, Twitter, LinkedIn). An announcement was also posted in the EdConnection newsletter.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Exceeding what was stated in the application, seminars to notify charter and traditional districts about Federal funding are carried out twice per year by staff from the Office of Federal Programs. Discretionary grant opportunities are publicized as described in the application.</p> <p>--</p> <p>December 2017 site visit: No changes were observed during the December 2017 visit; this element was still being implemented as necessary.</p>
<p>Ensure that each charter school in the State receives the charter school's commensurate share of Federal</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p>

Table 3.2: FEDERAL PROGRAMS AND FUNDING.

Responsibilities of the SEA to inform and ensure access to Federal programs and funding.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>education funds that are allocated by formula each year, including during the first year of operation of the charter school:</p> <p><input type="checkbox"/> Not specified in application</p> <p>To ensure accurate and timely disbursement of Federal funds, student enrollment is reported once annually except in the case of new or expanding charter schools, for which enrollment is submitted in fall for an initial allocation and again in winter for a revised allocation. This process is part of the established grants management routine.</p>		<p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The allocation process to ensure accurate and timely disbursement of funds reflects what was described in the grant application. A good faith effort is made to ensure schools receive all funds within 5 months of opening. Specifically, the Office of Federal Programs is alerted when a new charter contract or a change in an existing charter contract is submitted. For new or expanding schools (i.e., those adding more students than would be expected in a typical year), preliminary enrollment is documented in October and allocations occur in January based on revised enrollment counts. Existing schools that are not expanding receive allocations in July based on the previous year’s enrollment.</p> <p>--</p> <p>December 2017 site visit: No changes were observed during the December 2017 visit; this element was still being implemented as proposed.</p>

Sources: *March 2017* Draft CSP Grant Webpage; OH Community Schools Webpage; CSP AUPs 11 29 2016 updated 02-08-2017; Federal Program Communication to Eligible Community Schools; Reallocation of ESEA and IDEA Grant Business Rules Starting SY 16-17

December 2017 Draft CSP Grant Webpage; OH Community Schools Webpage; CSP AUPs 11 29 2016 updated 02-08-2017; Federal Program Communication to Eligible Community Schools; Reallocation of ESEA and IDEA Grant Business Rules Starting SY 16-17; OH CSP Grant Webpage

Indicator 3.3: ALLOCATION OF CSP FUNDS. The proportion of grant funds reserved by the State for each activity does not exceed the allowable amount.

Table 3.3: ALLOCATION OF CSP FUNDS.		
Limits on the allocation of CSP funds.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Not more than 5% for administrative expenses associated with the program:</p> <p>In the application, the grantee proposed to utilize \$2,908,320 of the requested \$71,058,320 award (4.1%) toward administrative expenses.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). <p>March 2017 site visit: Due to delays in funding subgrantees, the grantee has elected to utilize a conservative approach in spending administrative funds in which allocation of administrative funds will be based on the number of subgrantees funded. Work toward accomplishing CSP grant goals thus far has been completed in kind by the ODE staff. Administrative funds will be utilized to pay for the independent monitor, who has yet to be hired. Controls have been implemented in the CCIP system to ensure no more than 5 percent of funds are allocated for administrative purposes and controls have been implemented in the Ohio Administrative Knowledge System (OAKS) to ensure no more than 5 percent of funds are spent on administrative expenses.</p> <p>--</p> <p>December 2017 site visit: No implementation issues with the 5% cap on administrative expenses were present. Due to delays in project implementation, ED approved the reduction of the ODE's grant from \$71,058,320 to \$49,380,957. The ODE plans to use \$2,230,954 (4.5%) of the revised award on administrative expenses. Thus far the grantee has requested and been reimbursed for \$11,000 of administrative funds to pay for the external monitor. This accounts for 0.02% of the revised award.</p>
<p>Not more than 10% to support allowable dissemination activities:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Implementing as proposed or necessary (explain below).

Table 3.3: ALLOCATION OF CSP FUNDS.

Limits on the allocation of CSP funds.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The application indicated that funds would only be used for planning and implementation grants. Dissemination grants were not included in the application narrative.</p>	<p><input checked="" type="checkbox"/> Not applicable</p>	<p><input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
<p>Not more than 10% for the establishment of a revolving loan fund:</p> <p>The application indicated that funds would not be utilized for a revolving loan fund.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>

Sources: *March CSP Fiscal Management Plan 2017*

December CSP Fiscal Management Plan; Budget Reduction Memo for FY 17 NCC Slate; RE: Ohio CSP Modification Request (email)

Indicator 3.4: ADMINISTRATION OF CSP FUNDS. The SEA administers the CSP funds and monitors subgrantee projects to ensure the proper disbursement, accounting, and use of Federal funds.

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.		
Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
2 CFR 200.302 Financial Management and 2 CFR 200.313 Equipment		
(1) <i>Financial reporting (e.g., complete disclosure of financial results)</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The Office of School Finance (OSF) is responsible for providing budget support to the OCS including budget management, monitoring, and guidance. The OSF staff complete financial monitoring on a monthly and quarterly basis. The ODE uses the Ohio Administrative Knowledge System Business Intelligence (OAKS BI) to track and report on grant budgets, revenues, and expenditures. OAKS BI reports are used to reconcile the SEA’s accounting system, Ohio Administrative Knowledge System Financials (OAKS FIN), and compare budgets housed in the CCIP to actual expenditures. Regarding subgrantees, the AUPs outline that sponsors will conduct regular subgrantee monitoring activities. Monitoring carried out by sponsors will include monthly enrollment and financial records reviews and twice-annual comprehensive reviews to ensure each subgrantee is in compliance with State and Federal regulations, abiding by their contract, and progressing toward their performance standards. Reports from all sponsor monitoring activities will be submitted to the OCS for review. In addition, subgrantees will be required to conduct an annual independent financial and/or single audit and submit reports to the ODE. -- December 2017 site visit: At the time of the December 2017 visit, no changes in the ODE’s financial reporting process were observed; the grantee was implementing as necessary. Subgrantees reported that sponsors conduct monthly enrollment and financial records reviews as described in the AUPs. During the December 2017 visit, subgrantees were in the process of submitting materials for their first comprehensive review but documents had not yet been reviewed by the ODE.
(2) <i>Accounting records (e.g.,</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Implementing as proposed or necessary (explain below).

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p><i>source and application of funds)</i></p>		<p> <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). </p> <p>March 2017 site visit:</p> <p>The grantee uses several systems to manage accounting records. The CCIP houses grantee and subgrantee budgets and is used to specify budget limits and controls. OAKS FIN is used to manage finances. As the SEA’s accounting system, all payments and financial transactions are stored in OAKS FIN. The OAKS FIN system utilizes accounting codes to separate funds for different grants, departments, and fiscal years. Budgets housed in the CCIP are aligned to those submitted and confirmed in OAKS FIN. The Central Payment System (CPS) serves as the mechanism for making payments after expenditures are approved. OAKS BI serves as the SEA’s data warehouse and maintains records of all financial data.</p> <p>In its review of the monitoring report, the grantee clarified that the OCS staff approves all subgrantee budgets in the CCIP before sending awards to the subrecipient and accepting Payment Cash Requests (PCRs) for reimbursement. The ODE posts allowable costs on the CCIP for review and reference for both recipients and school finance staff. PCRs are checked electronically against the subrecipient’s budget before school finance staff review them. The OSF will send PCRs to the OCS Grants Manager for allowable cost review and approval, and the OCS will seek approval from ED before approving payments in the CCIP.</p> <p>--</p> <p>December 2017 site visit:</p> <p>During the December 2017 visit, the ODE had sufficient procedures in place for managing accounting records and were following the same procedures detailed from the March 2017 visit. However, the ODE did not have adequate processes in place to ensure approved subgrant budgets were fully justified and supported by the budget narrative.</p> <p>A review of subgrantee budgets found that two differed between what was proposed in the application and the approved budget in the CCIP. In one case, the subgrantee was awarded contingent on a budget modification. This subgrantee modified their budget as requested, and the changes were captured and approved in the CCIP system. The modification utilized funds for additional supplies, including an iPad mini, locking file cabinets, and bean bag chairs. In the second case, the subgrantee described expenses in their application budget</p>

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>(3) Internal control (e.g., process and measures to account for funds, property, and assets)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>narrative that were \$5,096 less than the award of \$350,000. Based on the content of the subgrant application, which refers to a request for \$350,000 elsewhere, it is likely this discrepancy was a mathematical error on the part of the subgrantee, but the ODE did not ask the subgrantee for clarification or to align the narrative with the budget. The extra money appears to have been allocated to the supplies category in the finalized budget, but no budget revisions were logged in the CCIP post-award to align the narrative with the budget. The ODE was not aware of this discrepancy and did not provide documentation identifying when this budget change occurred and how monies were reallocated.</p> <p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The grantee created a fiscal management plan to outline policies, processes, and procedures for CSP funds. As one of the specific conditions imposed on the grant, ED is requiring that all funds be dispensed to the ODE on a reimbursement basis after approval from ED. To accomplish this the CSP grant will not fall under typical the ODE draw down procedures and instead, the CSP Project Director will complete weekly expenditure reimbursement requests and send payment requests to ED for approval. Funds will only be drawn after ED approval is granted. While subgrants have not yet been awarded, subgrantee payments will only be made on a reimbursement basis following the same process of approvals.</p> <p>State guidance requires that all assets are inventoried and reported to the Ohio Department of Administrative Services. --</p> <p>December 2017 site visit: The grantee has adequate internal controls in place at the State; however, subgrantees are not appropriately tagging CSP assets. Additionally, the PCR process as implemented has shifted from what was communicated to subgrantees in terms of timelines, ability to submit two PCRs per month, and documentation requirements.</p> <p>As required, all grantee and subgrantee payments are made on a reimbursement basis after review from the OCS, OSF, and ED</p>

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>staff. Although the ODE initially intended to submit weekly reimbursement requests, this was changed to twice per month to reduce review process burden for the ODE and ED. Subgrantees were told that reimbursements can be requested on the 15th and 30th of each month and began spending under the notion that they would be able to request and receive reimbursements every other week.</p> <p>In practice, reimbursements have taken longer than two weeks. Subgrantees raised issues regarding the timeliness of reimbursements due to several factors. First, subgrantees noted that the documentation required with their PCRs varied from submission to submission without any guidance in advance to inform them about changes to required documentation. This resulted in several rounds of submission, review, and approval between subgrantees, ODE, and ED, causing a delay in reimbursements. Second, the PCR submission process only allows one active PCR at a time such that subgrantees cannot begin the PCR process for new expenses until the previous PCR is reimbursed. These issues coupled together placed subgrantees in difficult financial positions as they were unable to submit for new expenses until the prior PCR was complete. Subgrantees reported that having clearer guidance on required documentation from the outset, the ability to submit new PCRs while other PCRs are pending, and more realistic information about the timeframe for reimbursement would have been helpful for financial planning purposes.</p> <p>Although State guidance requires that assets are inventoried, two of the three subgrantees had not yet implemented a tagging system to identify CSP purchases and did not appear to be aware that tagging is required. These subgrantees indicated they know what was purchased with CSP funds based on common sense (e.g., all new furniture was purchased with CSP funds; all curriculum was purchased with CSP funds), which may be problematic in the future when similar items are purchased through other funding sources.</p>

(4) Budget control (e.g., process and measures to compare outlays with budget amounts)

- Yes
- No

- Implementing as proposed or necessary (explain below).
- Implementation issues identified (explain below).
- Non-substantive changes in proposed activities (explain below).
- Promising practice(s) identified (explain below).

March 2017 site visit:

The grant administration team within the OSF is responsible for managing the grant lifecycle financials including monitoring

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
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grant activity and close-out, as well as establishing budget controls and the maintaining of grant records. This team works closely with staff in other units of the OSF and with OCS to carry out these responsibilities.

The overall grant budget and all subgrantee budgets will be input into the CCIP system. Budgets will not be approved by the OCS staff in the CCIP unless they adhere to the specific grant requirements. In its review of the monitoring report, the grantee clarified that the OCS approves overall grant budgets before creating them in the CCIP and OAKS FIN. The office submits subgrantee awards to the CCIP for Office of Grants Management approval. These include the OCS-approved subgrantee detailed budgets.

The CCIP budgets will then be submitted to Budget Management for approval and incorporation into the OAKS FIN system. Because all PCRs will be classified as high risk, all subgrantees will receive payments on a reimbursement basis. PCRs will require supporting documentation and will be reviewed by a Grants Payment and Analysis Senior Analyst to ensure allowability of costs and timing. Next, the PCR will be sent to the Office of Community Schools for review and approval. The office will forward the PCR to ED for review and approval. Once ED approval is secured, the PCR will be approved and the subgrantee will be reimbursed. Throughout the process, OAKS BI is used to track and report on grant budgets, revenues, and expenditures. The grant administration team uses OAKS BI to review and reconcile each Federal draw.

While this process appears to be highly regulated, the initial determinations of budget approvals, as well as PCR reviews, will rely on the OCS staff providing ample training and continued consultation with the OSF staff to ensure allowable costs are fully understood. Currently, the plan to train school finance staff and facilitate ongoing collaboration on allowable costs has not been articulated.

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December 2017 site visit:

The ODE had implemented a process to ensure greater coordination between the OCS and OSF to ensure CSP budgets are effectively monitored and managed. Greater collaboration and coordination among The OCS and OSF staff was observed during the December 2017 visit. Processes for communication are clearly documented in the CSP Fiscal Management Plan. Due to difficulties providing sufficient documentation to ED for subgrantee reimbursements early in the year, a dedicated OSF

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>(5) Allowable cost (e.g., procedures to determine allowable, allocable, and reasonable use of funds).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>staff member with a background in auditing is now assigned to handle all subgrantee reimbursement requests. The processes utilized by this individual serve as a pre-audit of all expenditures prior to reimbursement.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The grantee stated that the OCS Grants Manager, with the help of the OSF’s Senior Financial Analyst, will be responsible for determining whether expenses are allowable and should be reimbursed. While processes are currently in place to verify allowability for other grant programs, success in this arena requires training from and collaboration with the OCS staff. Currently, the parameters of allowable costs have not been conveyed by the OCS. Staff from both the OCS and OSF explained that some type of training would occur but the process for and content of this training has not yet been conceptualized. The OSF staff indicated that they will work with the OCS to consult on atypical requests but exact processes for facilitating and documenting these conversations and subsequent decisions has not been fully developed. In addition, while a list of allowable expenses is included in the draft RFA for subgrantees, details regarding how subgrantees will learn about allowable costs were not articulated by the ODE staff during the visit.</p> <p>--</p> <p>December 2017 site visit: The grantee was implementing this element as necessary. Greater collaboration and coordination among the OCS and OSF staff was observed during the December 2017 visit. Processes for communication are clearly documented in the CSP Fiscal Management Plan. A dedicated OSF staff member with a background in auditing is now assigned to review all CSP PCRs to provide a preliminary audit of spending. Subgrantees were provided with documentation and training about allowable costs and reported that the information they received about allowability was sufficient. In addition, subgrantees indicated they reach out to the OCS with any questions about allowability and have received prompt responses.</p>
<p>(6) Source documentation (e.g., evidence from transactions)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below).</p>

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p><i>that accompany accounting records)</i></p>		<p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: High-Risk Specific Condition #1 requires the ODE to submit documentation of all expenditures and supporting evidence with each payment request.</p> <p>All subgrantee expenditures will be made on a reimbursement basis through the submission of PCRs. PCRs will require the submission of source documentation to verify that spending is allowable and occurred within the appropriate time period. Grants Payment and Analysis staff will be responsible for reviewing PCRs and supporting documentation and these materials will be submitted to ED for final review and approval before reimbursements are made.</p> <p>--</p> <p>December 2017 site visit: The general process for providing source documentation to receive reimbursements occurred as planned. From the outset, the ODE ensured subgrantees were aware that all CSP funds are disbursed on a reimbursement basis and informed subgrantees that requests for reimbursement in the form of PCRs could be submitted twice per month.</p> <p>Subgrantees interpreted this guidance such that they expected reimbursements could be submitted and paid out every two weeks. Subgrantees reported challenges with this process and delays in reimbursements due to changing source documentation requirements and the inability to have more than one active PCR. Source documentation required by the ODE changed due to questions and requests for further information raised by ED after reviewing early PCRs. Subgrantees reported that they were unaware of changes to documentation requirements until after submitting a PCR. This created the need for back and forth between the subgrantees and the ODE to ensure proper documentation was submitted, resulting in delayed reimbursements. Subgrantees requested greater clarity from the ODE about changes to source documentation requirements.</p>
<p><i>(7) Cash management (e.g., timely disbursement of funds to not accrue interest)</i></p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p>

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>March 2017 site visit: All payments will be made on a reimbursement basis and because each charter school constitutes its own LEA, funds will be distributed directly to each subgrantee. Thus, interest accrual does not appear to be a potential issue.</p> <p>--</p> <p>December 2017 site visit: No changes were observed during the December 2017 visit; this element was being implemented as necessary.</p>		
Other Regulations		
<p>34 CFR 80.36 Procurement standards, including competitive bidding and contracting</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
<p>March 2017 site visit: The ODE requires competitive bidding for procurement and contracting. Purchases of less than \$500 require two verbal quotes and are authorized by the program office. Purchases of more than \$500 but less than \$25,000 require posting to the Department of Administrative Services (DAS) and ODE websites and must be approved by the Chief Financial Officer. Purchases of more than \$50,000 must be handled by DAS and require approval from Chief Legal Counsel. To ensure staff are knowledgeable about the procurement policies and procedures, all staff involved in the procurement process must participate in annual training.</p> <p>--</p> <p>December 2017 site visit: This element was being implemented as necessary. In addition to maintaining the processes detailed from the March 2017 visit, the ODE had also created a requirement for subgrantees to describe and maintain procurement policies. As part of the RFA, applicants are expected to describe their procurement policies and be prepared to submit them if requested. In addition, assurances listed in the RFA require subgrantees to develop written procurement policies and abide by all local, State, and Federal procurement policies.</p>		
<p>34 CFR 75.525 Conflict of interest</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below).</p>

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: To protect against conflicts of interest, both State employees and suppliers are expected to adhere to Ohio ethics and conflict of interest laws, including Ohio Revised Code Sections 102.01 to 102.09 and former Governor Strickland’s Executive Order 2007-01S for Ethics. Guidance on procurement procedures suggests certification language for all purchases verifying that the supplier has reviewed and adhered to relevant laws. The ODE management is required to attend an annual ethics training provided by the Ohio Ethics Commission to ensure they are familiar with the ethics policies.</p> <p>Further, the draft RFA indicates that subgrantees will be expected to adhere to the same ethics guidelines as are relevant to the ODE staff. Subgrant applicants will be required to submit their conflict of interest policy as part of the subgrant application.</p> <p>--</p> <p>December 2017 site visit: This element was being implemented as necessary and as detailed from the March 2017 visit. Subgrantees were required to submit their conflict of interest policy with their application as planned.</p>
34 CFR 80.32(e) Disposition of assets	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).

See below for additional detail.

Sources:	March 2017	CSP Fiscal Management Plan; Community School Suspension and Closing Procedures; DAS Directive GS-D-12; Draft Request for Applications
	December 2017	CSP Fiscal Management Plan; Community School Suspension and Closing Procedures; DAS Directive GS-D-12; Draft Request for Applications; CSP_RequestFor:Application; CSP_AllowableCosts; Subgrantee Application Narratives; Budget Modification History Log; Route Payment Emails between ODE and ED

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES Additional Information. Detailed Information.

Approach to ensuring that subgrantees receive subgrant funds in appropriate timeframe.	Provide detailed narrative about the grantee’s current approach.
Accounting Systems Process (e.g., flow of funds)	<p>March 2017 site visit:</p> <p>The accounting process is comprised of three systems that work together to ensure budgeted allocations are allowable, requests for reimbursements are allowable, payments are made in a timely fashion, and transaction records are maintained. The CCIP houses applications and budgets and serves as the tool to submit claims. The grantee and all subgrantees submit budgets to the CCIP. Budgets are reviewed by the OCS to ensure the expenses are allowable. After the OCS approves the budget in the CCIP, it is sent to the OSF for secondary approval by the Budget Management team. Staff from Budget Management then enter the approved budget into OAKS. OAKS includes several different modules with two modules, Financials (OAKS FIN) and Business Intelligence (OAKS BI), being most pertinent to the accounting process. Entering the budget into the OAKS FIN system places the budget items into the Chart of Accounts (COA), which ensures distinct accounting codes for different grants, projects, and fiscal years. OAKS BI serves as the data warehouse and stores all relevant fiscal information from the development of budgets through final expenditures.</p> <p>Reimbursement will be used for all CSP fund expenditures. After an expense is incurred, the subgrantee will complete a PCR and upload supporting documentation into the CCIP system. The CCIP system includes internal controls to verify that all necessary information has been submitted. After CCIP verification, the PCR is sent to the Central Payment System and reviewed by a Senior Financial Analyst in Grants Payment and Analysis. The PCR is reviewed for allowability of costs, time period, and cash management. If deemed allowable, the PCR is sent to ED for review. PCRs will be submitted to ED on a weekly basis. ED will conduct a secondary review of the PCR and determine if it is approved. After approval is granted the PCR will be sent to OAKS FIN for payment and Accounting Services staff will draw funds. Because each community school is its own LEA, funds are sent directly to the school after this process is complete.</p> <p>--</p> <p>December 2017 site visit:</p> <p>There were no changes to the accounting process observed during the December 2017 visit. Reimbursement processes changed slightly. After an expense is incurred, the subgrantee completes a PCR and uploads supporting documentation into the CCIP system. Although the ODE initially required some documentation along with the PCR, the specific documentation required to process the PCRs changed over time based on conversations with ED. Initially, PCRs were reviewed by a Senior Financial Analyst in Grants Payment and Analysis. To ensure greater consistency in the collection of appropriate source documentation, the ODE modified the process such that a dedicated OSF staff member with a background in auditing reviews PCRs and documentation, resulting in a pre-audit of all expenditures. The PCR is reviewed for allowability of costs, time period, and cash management. If deemed allowable, the PCR is sent to ED for review. PCRs are submitted to ED up to twice per month. ED conducts a secondary review of the PCR</p>

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES Additional Information. Detailed Information.

Approach to ensuring that subgrantees receive subgrant funds in appropriate timeframe.	Provide detailed narrative about the grantee’s current approach.
	<p>and determines if it is approved. In some instances, ED requested clarifications or additional source documentation. After approval is granted, the PCR is sent to OAKS FIN for payment and Accounting Services staff will draw funds. Because each community school is its own LEA, funds are sent directly to the school after this process is complete.</p>
Disposition of Assets	<p>March 2017 site visit: The ODE guidance on community school suspension and closure procedures outline processes for the disposition of assets in the event of a closure. This guidance indicates that schools should follow EDGAR liquidation procedures in 34 CFR 80.32 for items worth \$5,000 or more. Assets valued at less than \$5,000 should be disposed of per the school’s disposition plan and all dispositions should be tracked. Currently, no subgrants have been awarded and therefore school disposition plans were not reviewed.</p> <p>In addition to these general policies, the <i>Community School Suspension and Closing Procedures</i> guidance indicates that assets acquired through CSP funds must be first offered to other community schools. If no community schools take the assets, an auction sale will occur. Any remaining assets after the sale will be offered to public school districts. A written report outlining where assets were disposed must be provided to the OCS.</p> <p>--</p> <p>December 2017 site visit: Disposition of assets policies were still being implemented as described from the March 2017 visit. The ODE and subgrantees had policies in place for ensuring proper asset disposal in the case of community school suspension or closure.</p>

Sources: *March 2017 CSP Fiscal Management Plan; Community School Suspension and Closing Procedures*

December 2017 CSP Fiscal Management Plan; Community School Suspension and Closing Procedures; Route Payment Emails between ODE and ED

Indicator 3.5: USE GRANT FUNDS. The SEA ensures that subgrantees' use of Federal funds is allowable, allocable, and/or reasonable.

Table 3.5: USE OF GRANT FUNDS.		
Use of the grant funds for the approved budget categories.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Post-award planning and design of the educational program		
Refinement of the desired educational program and of the methods for measuring progress toward those results	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> No concerns regarding use of funds in this category (explain below). <input type="checkbox"/> Unique uses of funds identified (explain below). <input type="checkbox"/> Specific guidance on this topic provided by the SEA to subgrantees (explain below). <input type="checkbox"/> Allowable, allocable, or reasonable use issues identified (explain below). March 2017 site visit: The draft RFA uses the Federal statutory language regarding allowable expenses. -- December 2017 site visit: The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide provides detail about common expense and when they are and are not allowable. Subgrantees did not budget for, nor use funds for, refinement of the educational program.
Professional development of teachers and other staff who will work in the charter school	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> No concerns regarding use of funds in this category (explain below). <input type="checkbox"/> Unique uses of funds identified (explain below). <input type="checkbox"/> Specific guidance on this topic provided by the SEA to subgrantees (explain below). <input type="checkbox"/> Allowable, allocable, or reasonable use issues identified (explain below). March 2017 site visit: The draft RFA uses the Federal statutory language regarding allowable expenses. -- December 2017 site visit: The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide provides detail about common expense and when they are and are not allowable. Subgrantees did not budget for, nor use funds for, post-award planning and design professional development.

Other uses of funds for planning or program design

- Yes
 No

- No concerns regarding use of funds in this category (explain below).
 Unique uses of funds identified (explain below).
 Specific guidance on this topic provided by the SEA to subgrantees (explain below).
 Allowable, allocable, or reasonable use issues identified (explain below).

March 2017 site visit:

The draft RFA describes, “development and implementation of plans and systems to increase student academic proficiency rates, close achievement gaps and increase high school graduation rates” as an allowable ‘other’ expense related to post-award planning and design.

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December 2017 site visit:

The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide provides detail about common expense and when they are and are not allowable. Subgrantees did not budget for, nor use funds for, other planning or program design.

Initial implementation of the charter school

Informing the community about the school

- Yes
 No

- No concerns regarding use of funds in this category (explain below).
 Unique uses of funds identified (explain below).
 Specific guidance on this topic provided by the SEA to subgrantees (explain below).
 Allowable, allocable, or reasonable use issues identified (explain below).

March 2017 site visit:

The draft RFA uses the Federal statutory language regarding allowable expenses.

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December 2017 site visit:

The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide indicates funds can be spent on outreach materials including postage for mailers, development of brochures and postcards, radio spots, and signage during the implementation phase.

According to one subgrantee’s budget, \$25,000 of subgrant funds will be spent on a marketing outreach campaign (e.g., flyers, direct marketing). Thus far, this subgrantee requested and received a reimbursement of \$17,667.31 for marketing expenses. According to another subgrantee’s budget, \$43,000 of subgrant funds will be spent on branding and community awareness. Thus far.

Acquiring necessary equipment and educational materials and supplies	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>this subgrantee requested and received a reimbursement of \$9,864.41 for radio advertisements and postcard mailers.</p> <p><input checked="" type="checkbox"/> No concerns regarding use of funds in this category (explain below).</p> <p><input type="checkbox"/> Unique uses of funds identified (explain below).</p> <p><input type="checkbox"/> Specific guidance on this topic provided by the SEA to subgrantees (explain below).</p> <p><input type="checkbox"/> Allowable, allocable, or reasonable use issues identified (explain below).</p> <p>March 2017 site visit: The draft RFA uses the Federal statutory language regarding allowable expenses.</p> <p>--</p> <p>December 2017 site visit: The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide indicates funds can be used for expenses such as technology hardware, software, furniture, and books during the implementation phase.</p> <p>According to one subgrantee's budget, \$195,000 of subgrant funds will be spent on technology, software, furniture, and supplies. Thus far, this subgrantee requested and received a reimbursement of \$33,992.40 for technology and supplies expenses.</p> <p>According to another subgrantee's budget, \$204,775 of subgrant funds will be spent on furniture, technology, and supplies. This figure includes the Achievement Net program (\$35,100), which is bundled with professional development and coaching for teachers. Thus far, this subgrantee requested and received a reimbursement of \$141,954 for technology and furniture.</p> <p>According to another subgrantee's budget, \$180,656 of subgrant funds will be spent on supplies, furniture, and technology. Thus far, this subgrantee requested and received a reimbursement of \$3,140.50 for technology and software.</p>
Acquiring or developing curriculum materials	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p><input checked="" type="checkbox"/> No concerns regarding use of funds in this category (explain below).</p> <p><input type="checkbox"/> Unique uses of funds identified (explain below).</p> <p><input type="checkbox"/> Specific guidance on this topic provided by the SEA to subgrantees (explain below).</p> <p><input type="checkbox"/> Allowable, allocable, or reasonable use issues identified (explain below).</p>

March 2017 site visit:

The draft RFA uses the Federal statutory language regarding allowable expenses.

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December 2017 site visit:

The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide indicates funds can be spent on textbooks and curriculum during the implementation phase.

According to one subgrantee's budget (not yet reimbursed), \$100,000 of subgrant funds will be spent on curriculum. According to another subgrantee's budget, \$82,129 of subgrant funds will be spent on curriculum. Thus far, this subgrantee requested and received a reimbursement of \$11,724.37 for curriculum. According to another subgrantee's budget (not yet reimbursed), \$35,791.98 of subgrant funds will be spent on curriculum.

Other initial operational costs that cannot be met from State or local sources

Yes
 No

No concerns regarding use of funds in this category (explain below).

Unique uses of funds identified (explain below).

Specific guidance on this topic provided by the SEA to subgrantees (explain below).

Allowable, allocable, or reasonable use issues identified (explain below).

March 2017 site visit:

The draft RFA describes other initial operating costs considered allowable in situations in which the costs are not covered by State or local funds. These expenses include costs for office functioning, installation of new computers, personnel during initial implementation, and rental/occupancy costs prior to school opening.

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December 2017 site visit:

The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide indicates funds can be used for other expenses such as administrative furniture in the implementation phase and essential staff salaries in the implementation phase for up to three months prior to the school opening.

According to one subgrantee's budget, \$10,000 of subgrant funds will be spent on acquiring technology, furniture, and supplies to establish a main office. Thus far, this subgrantee requested and received a reimbursement of \$1,414.19 for initial office set up expenses.

According to another subgrantee’s budget, \$100,056.90 of subgrant funds will be spent on initial operating costs including the management organization start up services fee (which includes oversight of curriculum and development, teacher professional development, talent recruitment, supplies, and operations; \$68,977.56), setting up payroll services (\$3,000), direct dialing service (\$333.79), rent prior to school opening (\$627.18), compensation and benefits for the School Director and Dean of Family/Community Engagement prior to the school opening (\$23,118.37), and administrative office equipment (\$4,000). Thus far, this subgrantee requested and received a reimbursement of \$18,857.25 toward rent and salary and benefits for the School Director and Dean of Families.

Other uses of funds for initial implementation

- Yes
- No

- No concerns regarding use of funds in this category (explain below).
- Unique uses of funds identified (explain below).
- Specific guidance on this topic provided by the SEA to subgrantees (explain below).
- Allowable, allocable, or reasonable use issues identified (explain below).

March 2017 site visit:

No subgrants have been awarded to date and other uses of funds for initial implementation are not described in the RFA beyond what is described above. The RFA outlines expenses that are not allowable including the acquisition of a vehicle, construction, food, and school apparel for staff or students.

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December 2017 site visit:

The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide indicates funds can be used for other purposes including one-time professional development.

According to one subgrantee’s budget (not yet reimbursed), \$15,000 of subgrant funds will be spent on NWEA and Curriculum professional development and after school training stipends for time spent in professional development during the school’s first year of operation.

According to another subgrantee’s budget, \$15,000 of subgrant funds will be spent on professional development related to iReady and EPSON Whiteboards. Thus far, this subgrantee requested and received a reimbursement of \$10,500 for EPSON Whiteboards training.

According to another subgrantee's budget, \$33,495.09 of subgrant funds will be spent on compensation and benefits for teacher time attending a summer professional development institute, materials/curriculum for the institute, CGI training, and BookShop webinar. Thus far, this subgrantee requested and received a reimbursement of \$19,746.99 toward salary and benefits for the teachers during the professional development institute.

Dissemination activities (if applicable)

Assisting other individuals with the planning and start-up of one or more new public school(s) Yes No NA

No concerns regarding use of funds in this category (explain below).
 Unique uses of funds identified (explain below).
 Specific guidance on this topic provided by the SEA to subgrantees (explain below).
 Allowable, allocable, or reasonable use issues identified (explain below).

Developing partnerships with other public schools Yes No NA

No concerns regarding use of funds in this category (explain below).
 Unique uses of funds identified (explain below).
 Specific guidance on this topic provided by the SEA to subgrantees (explain below).
 Allowable, allocable, or reasonable use issues identified (explain below).

Developing curriculum materials, assessments, and other materials that promote increased student achievement Yes No NA

No concerns regarding use of funds in this category (explain below).
 Unique uses of funds identified (explain below).
 Specific guidance on this topic provided by the SEA to subgrantees (explain below).
 Allowable, allocable, or reasonable use issues identified (explain below).

Conducting evaluations and developing materials that document successful practices Yes No NA

No concerns regarding use of funds in this category (explain below).
 Unique uses of funds identified (explain below).
 Specific guidance on this topic provided by the SEA to subgrantees (explain below).
 Allowable, allocable, or reasonable use issues identified (explain below).

Other uses of funds for dissemination Yes No NA

No concerns regarding use of funds in this category (explain below).
 Unique uses of funds identified (explain below).
 Specific guidance on this topic provided by the SEA to subgrantees (explain below).
 Allowable, allocable, or reasonable use issues identified (explain below).

Sources: March Draft Request for Applications
2017

December 2017 Draft Request for Application; CSP_RequestForApplication; CSP Grant Allowable Costs Guide; Subgrantee Application Narratives; SCPA PCR; SCPA 016829-10192017111320 (002); Aug15_2017_ViewPCRAttachment; Aug15_2017_PCR_ScreenShot; 41744.74-09252017090346; 016850 SWOP CSP PCR; Budget Modification History Log

Indicator 3.6: LEA DEDUCTIONS. The State ensures that the LEA does not deduct funds for administrative expenses or fees unless the eligible applicant enters voluntarily into an administrative services arrangement with the relevant LEA.

Table 3.6: LEA DEDUCTIONS.		
SEA efforts to ensure LEA deductions are appropriate.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Inform LEAs and subgrantees regarding the LEA’s ability to deduct administrative expenses or fees.</p> <p>Per the application, under Ohio State statute charter schools are defined as LEAs. As LEAs, they directly receive State and Federal funding.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).
<p>Ensure any deductions are mutually agreed upon and voluntary.</p> <p>Per the application, under Ohio State statute charter schools are defined as LEAs. As LEAs, they directly receive State and Federal funding.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).
<p>Identify and resolve concerns related to LEA deductions from grant funds.</p> <p>Per the application, under Ohio State statute charter schools are defined as LEAs. As LEAs, they directly receive State and Federal funding.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).

Sources: N/A

Indicator 3.7: TRANSFER OF STUDENT RECORDS. The SEA ensures that a student’s records and, if applicable, individualized education program (IEP) accompany the student’s transfer to or from a charter school in accordance with Federal and State law.

Table 3.7: TRANSFER OF STUDENT RECORDS.		
SEA efforts to ensure timely transfer of student records.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Inform LEAs and charter schools about their responsibilities to transfer student records, including IEPs.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The OCS staff reported that in the past authorizers have received training on issues related to starting a community school, which included discussion on transfer of student records, but these trainings are not currently occurring or planned. Authorizers receive the <i>Community School Suspension and Closing Procedures</i> document and are expected to articulate necessary information to the community schools under their purview. There was no evidence suggesting that the OCS currently conducts any outreach to LEAs or community schools regarding records transfer. -- December 2017 site visit: No changes were observed during the December 2017 visit. While State law (ORC 3313.672), details LEA responsibilities for records transfer, the ODE was not engaged in activities at the time of the site visit to inform LEAs and charter schools about their responsibilities to transfer student records.
Ensure student records, including IEPs, are transferred according to State laws and guidelines.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: While guidelines for transfer of records related to school closures exist, it appears that guidelines for

Table 3.7: TRANSFER OF STUDENT RECORDS.

SEA efforts to ensure timely transfer of student records.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>transfer of records in other situations have not been developed. Agency-wide, the ODE is not permitted to house student records and the transfer of records occurs between LEAs. There is currently no mechanism for the OCS or ODE to verify that records, including IEPs, are transferred in a timely manner. Further, guidance for school closures delegates responsibility for records transfer to the authorizer.</p> <p>--</p> <p>December 2017 site visit:</p> <p>Due to statutory regulations in Ohio, the OCS staff are not permitted to handle student records. Although the OCS is available to support schools if needed, authorizers have primary responsibility for ensuring records transfer occurs as intended. Subgrantees noted that it can be difficult to obtain necessary records and school staff are often required to do extensive outreach, including having parents go to their child’s previous school to obtain records. One subgrantee described reaching out to their authorizer when difficulties arose and reported that the authorizer helped the school obtain necessary records. The remaining subgrantees did not reach out to their authorizer and instead attempted to obtain records on their own.</p>
<p>Intervene in transfer of student records, including IEPs, when records are not received.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>When delays in the transfer of student records arise and an OCS intervention is necessary, the OCS staff may work directly with community school staff, traditional school staff, and authorizers to facilitate the records transfer process. In cases where IEPs are delayed, the Office of Exceptional Children intervenes. The OCS representatives noted that they have had to step in to resolve issues and these experiences have been successful thus far. In the case of school closures, authorizers are expected to have copies of all student records in case files are not successfully delivered.</p> <p>--</p>

Table 3.7: TRANSFER OF STUDENT RECORDS.

SEA efforts to ensure timely transfer of student records.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Ensure that student records are appropriately transferred when a charter school closes.</p>	<p> <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable </p>	<p>December 2017 site visit: No changes were observed during the December 2017 visit.</p> <p> <input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). </p> <p>March 2017 site visit: The ODE has developed and disseminated guidance to be used if a community school is suspended or closed. This guidance places responsibility for ensuring transfer of student records in the hands of the authorizer. Authorizers are expected to ensure that original student records are returned to each student’s district of residence within 7 days of the school closure. Special education records are to be sent to the receiving school or school district’s special education administrators. When a school closes, the authorizer must complete a Suspension & Closing Assurance Form which confirms that records have been properly distributed. To encourage adherence to the guidance, Closure Process is an element in the <i>Authorizer Quality Practices Rubric</i> and authorizers are rated regarding their ability to carry out a closure process where records are transferred to home school districts in an orderly manner. While this is the case, it is unclear how OSC ensures appropriate transfer of student records during a school closure beyond delegating responsibility to the authorizer.</p> <p>--</p> <p>December 2017 site visit: No changes were observed during the December 2017 visit.</p>

Sources: *March and December 2017 Authorizer Quality Practices Rubric; Community School Suspension and Closing Procedures*

Indicator 3.8: RECORDKEEPING. All financial and programmatic records, supporting documents, statistical records, and other records of grantees and subgrantees related to the CSP grant funds are maintained and retained for grant monitoring and audit purposes.

Table 3.8: RECORDKEEPING.		
EDGAR regulations require grantees to:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Maintain recordkeeping system and practices.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The grantee maintains all grant files within their SharePoint, CCIP, and compliance systems. SharePoint houses all grant documents including the grant application, GANs, and correspondence with ED. The CCIP currently houses the overall grant budget. When the subgrant application process begins, the CCIP will house all subgrant applications and budgets. The CCIP also maintains a history log capturing changes to CCIP files over time. The compliance system houses all documents obtained during compliance evaluations. All relevant staff have access to the information in these systems and staff can have access granted or revoked as staffing changes. -- December 2017 site visit: The ODE continued to implement its recordkeeping system and practices as necessary at the time of the December 2017 visit. Subgrantees maintained all relevant records in appropriate formats including having hardcopy files and storing files electronically.
	<input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable	
Follow records retention policy and practices.	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The ODE adheres to Ohio Department of Administrative Services guidelines stating that files related to Federal grants must be retained until both State and Federal audits are complete, audit reports are released, and audit resolutions are issued or resolved. While this policy does not explicitly
	<input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable	

Table 3.8: RECORDKEEPING.

EDGAR regulations require grantees to:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>state that files will be retained for three years, conversation with legal staff during the site visit indicated that records are not destroyed until at least three years after the final audit is complete. While the ODE has a records destruction process, no files in the CCIP system have been destroyed to date. In addition, according to the draft RFP, subgrantees will be expected to maintain all records for three years after the submission of the final report.</p> <p>--</p> <p>December 2017 site visit:</p> <p>The ODE continued to follow the records retention policy described from the March 2017 visit. Subgrantees were aware of the need to retain their CSP records.</p>

Sources: *March 2017 CSP Fiscal Management Plan; Draft Request for Applications*

December 2017 CSP Fiscal Management Plan; Draft Request for Applications; CSP_RequestForApplication

Indicator 3.9: COMPLIANCE WITH GRANT CONDITIONS. The State has no significant compliance issues with Federal statutes, regulations, and the terms and conditions of the grant.

Table 3.9A: COMPLIANCE WITH GRANT CONDITIONS.		
SEA efforts to meet the terms and conditions of the grant.	Implementation Issue?	Detailed Information Provide a detailed narrative about the grantee’s approach.
<p>Comply with grant conditions and adhere to restrictions.</p> <p><input type="checkbox"/> Not applicable. The State does not have specific conditions placed on the grant.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> NA</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Progress has been made on several but not all specific conditions.</p> <p>See below for additional detail.</p> <p>--</p> <p>December 2017 site visit: The ODE is complying with all high-risk specific grant conditions. The ODE has completed hiring an independent monitor, forming an advisory committee, developing a Comprehensive Plan, developing a monitoring protocol, and making publicly available a charter school directory. Route payment, quarterly reporting, and ineligibility of dropout and recovery schools for subgrants are ongoing. The process for providing documentation of invoices for ED review is still being improved.</p> <p>See below for additional details.</p>
<p>Identify and resolve instances of noncompliance.</p> <p><input type="checkbox"/> Not applicable. The State does not have specific conditions placed on the grant.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> NA</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input checked="" type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Progress has been made on several but not all specific conditions.</p> <p>See below for additional details.</p> <p>--</p> <p>December 2017 site visit:</p>

Table 3.9A: COMPLIANCE WITH GRANT CONDITIONS.

SEA efforts to meet the terms and conditions of the grant.	Implementation Issue?	Detailed Information Provide a detailed narrative about the grantee’s approach.
<p>Ensure performance reports are timely and of acceptable quality.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Based on the October 2017 monitoring report, ED developed a corrective action plan for the ODE addressing any monitoring indicator that was largely met, partially met, or not met. The corrective action plan included 13 items. The ODE was able to address many of them by developing and gaining approval for key documents associated with the first subgrant competition (and also required by the High-Risk Specific Conditions), including the RFA, Comprehensive Plan, and monitoring protocol. Ten of the 13 items were satisfactorily resolved and closed by ED as of 12/4/2017. At the time of the December site visit, three items remained open as ED requested additional information and documentation from the ODE. These relate to how an LEA can serve as a CMO; the ODE’s processes for processing payments; and State guidance and processes related to transfer of student records. The ODE responded to ED with additional information about these elements on December 20, 2017.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Grantee submitted Annual Performance Reports and CSP Data Collection Forms in a timely manner. -- December 2017 site visit: The grantee continued to implement this element as necessary and as described from the March 2017 site visit. In addition, grantee is complying with High-Risk Specific Condition 3, which requires quarterly reporting.</p> <p>See additional details below.</p>
<p>Ensure timely and reasonable access to grant records and key personnel for monitoring purposes.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p>

Table 3.9A: COMPLIANCE WITH GRANT CONDITIONS.

SEA efforts to meet the terms and conditions of the grant.	Implementation Issue?	Detailed Information Provide a detailed narrative about the grantee’s approach.
		Grantee provided timely and reasonable access to documents and personnel for the site visit. -- December 2017 site visit: The grantee continued to implement this element as necessary and as described from the March 2017 visit.
Sources: <i>March 2017</i>	<i>ED letter to ODE dated September 14, 2016; Grant Award Notification U282A150023 Action Number 4</i>	
<i>December 2017</i>	<i>Ohio High Risk Condition Gantt Chart updated 1.12.18; ODE Corrective Action Plan Tracker 12.20.17</i>	

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>High-Risk Specific Condition 1:</p> <p>The ODE’s CSP SEA grant shall continue on route payment so that all payment requests are routed to the program office for approval prior to any funds being released. In addition, within 10 days of being notified of this condition and subsequently at least thirty days before the beginning date of each six-month budget period of the grant (October 1 and April 1), the ODE must provide to the Department an itemized budget that the program office will review and approve, as appropriate. When a payment request is submitted in the G5 system, the ODE must provide to the Department documentation of all expenditures and supporting evidence to justify the allowability of all costs included in the payment request. All requests shall be submitted to the Department in a timely manner and will allow for, at minimum, 48 hours turnaround time for program office review.</p>	<p>March 2017 site visit: Ohio’s current grant was awarded on September 28, 2015. On November 4, 2015, ED asked the ODE to not draw down funds while ED conducted a supplemental review of the ODE’s grant application. In a September 14, 2016 letter, ED informed the ODE that the supplemental review was complete and the SEA may begin conducting activities under its CSP SEA grant, subject to High-Risk Specific Conditions and Specific Conditions in the GAN.</p> <p>Between July 2015 and October 2016, the ODE revamped its authorizer evaluation process by convening an Independent Advisory Panel to make recommendations to improve the process, updating the authorizer evaluation process based on those recommendations, conducting the authorizer evaluations, and releasing the community school sponsor ratings. Throughout this period, the ODE could not award subgrants until eligible sponsors were identified.</p> <p>At the time of the site visit, the ODE had not drawn down any grant funds. All CSP SEA grant activities, such as developing the RFA and agreed-upon procedures and selecting an independent monitor, were paid in-kind with State funds. Therefore, the itemized budget and payment request process required of High-Risk Specific Condition 1 were not yet applicable. The ODE will only use grant funds to cover the independent monitor and subgrant awards. Other administrative costs will continue to be paid in-kind by the State.</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
	<p>--</p> <p>December 2017 site visit:</p> <p>The ODE was complying with this condition at the time of the December 2017 site visit, but there were still process efficiencies and standardized documentation procedures that needed to be adopted by the grantee to streamline the route payment process.</p> <p>The ODE started invoicing ED for grant payments to reimburse subgrant expenditures in August 2017. The ODE has submitted four requests to ED, not including one cancelled request. The ODE conducts two internal reviews of subgrant expenditures before submitting to ED for approval. The OCS Grants Manager first reviews the request. If it is complete and allowable, it is sent to an external monitor in the OSF for a detailed review of subgrantee invoices and to ensure the necessary, detailed documentation of expenditures is present. If the request passes both of these reviews, it is then submitted to ED for review and approval. Once ED approves, the ODE’s CFO requests the draw from G5. To date there has been quite a bit of back and forth between the ED and ODE before invoices have been approved to ensure requests are clear, allowable, and adequately supported with documentation. Procedures to improve the quality, consistency, and ease of documentation submitted to ED were still being developed at the time of the site visit.</p> <p>The ODE’s grant budget was revised in October 2016 and again in Fall 2017. For the 2017 revision, the ODE originally submitted a proposed budget to ED on September 1, 2017 and after multiple communications between the ED and ODE to review and revise, it was approved by the ED program officer on November 1, 2017.</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>High-Risk Specific Condition 2:</p> <p>The ODE shall hire an independent monitor approved by the Department to perform periodic Agreed-Upon Procedures (AUPs) that address the major areas of program implementation risk, including monitoring the SEA and subgrantees. The independent monitor will be hired at least 30 days prior to publishing the first Request for Applications (RFA) under ODE’s CSP SEA grant. The scope of these AUPs will be developed by the ODE in a process monitored by the Department. The Department will have direct, unfiltered access to the independent monitor and the records of the monitor, and the Department will require that any reports produced by the independent monitor be made available to the public. The independent monitor may be paid out of CSP SEA grants funds. The independent monitor will cost no more than \$250,000 per year.</p>	<p>March 2017 site visit:</p> <p>The ODE issued the Request for Competitive Sealed Proposals (RFP) for the independent monitor on January 31, 2017. The Department of Administrative Services posted the solicitation, answered questions, and received the sealed bids. Four offerors submitted proposals by the February 22, 2017 due date. A consensus meeting was held on February 28, 2017 to evaluate and score each proposal. The Department of Administrative Services planned to open the price proposals separately on Wednesday, March 1 but postponed the opening of the bids to allow time for negotiating with the offerors. For the purposes of meeting High-Risk Specific Condition 2, the date that the ODE accepts the vendor’s contract will be considered the hire date for the independent monitor.</p> <p>The AUPs were developed by the ODE in consultation with the Auditor of State and ED to guide the independent monitor’s review of the following high-risk areas: 1) Application & Selection of Subgrant Recipients, 2) Grant Recipient Claims and Payments, and 3) Monitoring and Performance. The AUPs will be finalized as part of the contract negotiations with the independent monitor.</p> <p>--</p> <p>December 2017 site visit:</p> <p>The ODE completed the hiring process of the independent monitor using a competitive bidding process and selected the accounting firm of Kennedy Cottrell Richards. LLC (KCR). The engagement letter with AUPs was signed on May 31, 2017 by KCR, the Auditor of State, and ED. KCR issued its first report on August 14, 2017 based on the monitoring period of July 1, 2016 to June 30, 2017 with confirmatory findings of all elements reviewed. KCR’s next annual report will include monitoring CSO on its subgrantee monitoring (including desk reviews and onsite visits), subgrant reimbursement process, the second round of the subgrant competition, and other CSP processes.</p>
<p>High-Risk Specific Condition 3:</p> <p>The ODE must submit to the Department quarterly performance reports (January 1, April 1, July 1, and October 1 of each year for the duration of the grant).</p> <p>a. The performance reports shall describe all grant activities and expenditures (capturing</p>	<p>March 2017 site visit:</p> <p>The ODE submitted a quarterly performance report for the period of January 1, 2016 through September 30, 2016 on October 21, 2016 and the update on community school audit findings and resolutions and Appendix C were submitted on November 7, 2016, deadline extensions were approved by ED. The ODE submitted the quarterly report for the period October 1, 2016 through December 31, 2016</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>activity through the last day of the prior month), including the following information:</p> <ul style="list-style-type: none"> i. updates on grant project timelines; ii. updates on the timeline for implementing the Authorizer Quality Performance Review, and how the implementation status impacts the grant budget; and iii. updates on audit findings and resolutions of audits involving charter schools in Ohio including the authorizers’ responsibility and involvement. <p>b. Semiannually (January 1 and July 1 of each year) the performance report shall also:</p> <ul style="list-style-type: none"> i. include a report on all obligations, expenditures, revenues, and activities under the grant, including: <ul style="list-style-type: none"> 1. a listing of the specific entities awarded CSP subgrants and the amount of those subgrants; 2. the authorizer of each subgrantee; 3. a description of the process by which subgrantees were selected for funding, including the criteria for evaluating subgrant applicants, and the scores and comments from subgrant competition peer reviewers; and 4. other information that the Department may determine is necessary to ensure public transparency and accountability regarding the ODE’s CSP SEA grant program. ii. be made available to the public and reviewed by the independent monitor under the agreed-upon procedures discussed in condition 2 above. 	<p>on December 27, 2016. Each quarterly report included the updates on the project timeline, updates on the timeline of the Authorizer Quality Performance Review, and update on audit finds and resolutions.</p> <p>The semiannual performance report for July 1, 2016 through December 31, 2016 was submitted with the last quarterly report on December 27, 2016. There were no obligations, expenditures, revenues, or activities paid for with grant funds to report.</p> <p>--</p> <p>December 2017 site visit: The ODE submitted progress reports to ED in 2017 as follows:</p> <ul style="list-style-type: none"> • 4/14/2017 (2-week extension on delivery approved by ED): Quarterly performance report for January 1-March 31, 2017; High-Risk Condition Gantt Chart updated 3/30/2017; updated Appendix C (report on school audits) • 6/29/2017: Quarterly performance report for April 1-June 30, 2017; High-Risk Condition Gantt Chart updated 6/28/2017; updated Appendix C (report on school audits) • 9/29/2016: Quarterly performance report for July 1-September 30, 2017; High-Risk Condition Gantt Chart updated 9/12/2017; updated Appendix C (report on school audits) <p>All reports were accepted and approved by the ED program officer. In October 2017, ED approved a permanent shift in the due dates for these reports from the 1st to the 15th of the month.</p>
<p>High-Risk Specific Condition 4:</p> <p>The ODE shall establish a Grant Implementation Advisory Committee (Advisory Committee). The Advisory Committee will consist of representatives from key stakeholder groups in Ohio such as nonprofits with relevant expertise in charter school authorizer quality; state charter school organizations; institutes of higher education with particular expertise in performance management; high-quality charter management organizations; and organizations that represent the interests of families with children in charter schools. In addition, the ODE may wish to include representatives of national</p>	<p>March 2017 site visit:</p> <p>At the time of the site visit, the Advisory Committee had been established and the first meeting was planned for March 3, 2017. The Plan for the Ohio Grant Implementation Advisory Committee outlines the Advisory Committee’s scope of work, the members’ commitment, and the make-up of the committee membership. The Advisory Committee is made up of Ohio stakeholders including representatives from institutes of higher education, Ohio community school sponsor organizations, nonprofits with expertise in community school sponsor quality, policy organizations, and national organizations with expertise in community school oversight and quality.</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>organizations with expertise in charter school oversight and quality. The ODE will create a charter for the Advisory Committee that sets forth roles, responsibilities, and membership, and includes rules that will address any potential conflict of interest issues; the charter will be subject to review and approval by the Department. The Advisory Committee shall not receive any compensation from ODE’s CSP SEA grant funds and shall be formed at least 30 days prior to the ODE publishing the first RFA under the ODE’s CSP SEA grant. The Advisory Committee will provide and ensure additional accountability with respect to the implementation of the ODE’s CSP SEA grant, to include co-signing the semiannual reports produced as part of condition 3 above.</p>	<p>During interviews with the site visit team, the ODE described the Advisory Committee’s scope of work. In addition to signing the semiannual reports, the Advisory Committee would also provide feedback on the RFA and the peer review process and may be convened quarterly to provide feedback throughout the implementation process.</p> <p>--</p> <p>December 2017 site visit:</p> <p>The Advisory Committee met on March 30, 2017, April 13, 2017, and September 29, 2017. The governance document reflecting the plan described above was adopted by the committee at its April meeting. The OCS Director described the group as a “helpful second set of eyes”. It reviews and approves the quarterly, annual, and semi-annual reports to ED, reviewed and provided feedback on the RFA, and raises questions and provides other feedback to the OCS on the grant. He noted that the OCS uses the committee in ways beyond those required in ED’s High-Risk Condition; for example, the committee provides more opportunities to get the word out about the grant and can review and advise on a range of documents and issues. Development of a grant Advisory Committee may be considered a best practice.</p>
<p>High-Risk Specific Condition 5:</p> <p>The ODE shall develop a comprehensive plan for administering its CSP SEA grant effectively and efficiently for the duration of the grant’s performance period. This plan must be submitted for review and approval by the Department prior to the ODE conducting a CSP subgrant competition and at a minimum, must describe the systems and processes the ODE will implement for the following:</p> <ul style="list-style-type: none"> a. authorizer evaluation and quality control, including an assurance that the ODE will, in the context of designing the subgrant competition, awarding, and monitoring CSP subgrants, take into account: <ul style="list-style-type: none"> i. the final authorizer ratings from the authorizer review process as well as, if appropriate, any additional information that reflects on authorizer performance; and ii. any additional information that may indicate increased risk when reviewing and monitoring compliance for an authorizer’s full universe of charter schools; 	<p>March 2017 site visit:</p> <p>At the time of the site visit, the ODE had not developed a comprehensive plan for administering its CSP grant. The ODE stated that rather than one document there are numerous separate policies that address High-Risk Specific Condition 5 and as decisions are made they will be put into writing and may be reviewed by the Advisory Committee before being sent to ED for review and approval.</p> <p>The site visit team notes that the separate policies that address High-Risk Specific Condition 5 were not available for review at the time of the site visit. The ODE had submitted the draft RFA to ED for feedback and the fiscal management plan was submitted to the site visit team for review, but the RFA process and the competitive subgrant award process were still in the developmental phase.</p> <p>--</p> <p>December 2017 site visit:</p> <p>Between the March 2017 site visit and the opening of the RFA competition, the ODE completed the Comprehensive Plan and simultaneously, the RFA, Review and Award Process document, Notice of Grant Award, and other related documents. The OCS coordinated the development of all of these documents with a large spreadsheet</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>b. subgrantee eligibility screening;</p> <p>c. the RFA process, including a copy of the RFA for review and approval by the program office prior to publication;</p> <p>d. the competitive subgrant awards process, including:</p> <p>i. pre-application training;</p> <p>ii. selection and training of reviewers;</p> <p>iii. budget reviews, internal screening, and risk assessment; and</p> <p>iv. award determination process;</p> <p>e. processing of subgrantee payments; and</p> <p>f. ensuring subgrantee adherence to all program requirements and the terms of their approved applications.</p>	<p>crosswalking grant requirements and needed actions to references in Federal and State documents and identification of each item for inclusion in the RFA, Comprehensive Plan, and other documents. The OCS coordinated closely with ED to review the documents being developed and gain their approval. The RFA was approved by ED on April 5, 2017 and the Comprehensive Plan on May 17, 2017, with the notification from ED that the ODE could then open its grant competition.</p> <p>The Comprehensive Plan provides a guide for the overall implementation of the grant and details processes required throughout the lifecycle of the grant. As completed and approved by ED, it contains sections on:</p> <ul style="list-style-type: none"> • Sponsor Evaluation and the Subgrant Competition (monitoring subgrantees and the sponsor evaluation) • Sponsor Evaluation and Quality Control • Subgrantee Eligibility Screening • Request for Application Process (request for application design, technical application development, applicant technical assistance, needs assessment advisory groups) • Competitive Award Process (review and award process/technical review checklist, subgrant application technical review, peer review scoring rubric, subgrant application peer review, score analysis, subgrant selection, award announcement) • Processing of Subgrantee Payments • CSP Subgrantee Adherence to Program Requirements (on-going fiscal monitoring, on-going monitoring by sponsors, fall desk review, spring site visit, annual grant activities report) • Corrective Action for Non-Compliance • Planning Evaluation Rubric • Implementation Rubric • The Department’s Compliance System • Annual Review and Update of the Monitoring Process and Protocols • The Department’s Adherence to Program Requirements (any special and high-risk conditions for the Ohio Grant (if applicable), quarterly, semi-annual and annual performance reports, grant implementation advisory committee, working with

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
	<p>the U.S. Department of Education, independent monitor, semi-annual submission of itemized budget, ED site visits and monitoring corrective action plans (as applicable))</p> <p>As noted above, the OCS has found the Comprehensive Plan extremely useful. Staff noted that it is a “go-to” document in guiding administration of the grant and was key to on-boarding the new Grants Manager. The OCS Director uses it as tool for what the program needs to do and as a way to hold the team accountable, and staff have plans for keeping it updated and using it in additional ways, such as to improve sponsor practices. Development of a Comprehensive Plan may be considered a best practice.</p>

High-Risk Specific Condition 6:

Prior to making any subgrant awards, the ODE must develop a subgrantee monitoring protocol. At a minimum, the monitoring protocol must address financial accountability and include a risk rubric and timeline for conducting monitoring activities that will apply to all subgrantees for the duration of the grant. This subgrantee monitoring protocol must be reviewed and approved by the Department prior to the ODE implementation. Department staff will be available to provide technical assistance to ODE, as necessary, to help ensure that ODE’s monitoring protocol establishes strong internal controls and mitigates areas of risk throughout the performance period of this grant.

March 2017 site visit:

Ohio’s Public Charter School Subgrant Monitoring Protocol outlines a plan for monitoring CSP subgrantees in the following four areas: 1) Eligibility and ongoing monitoring of sponsor’s eligibility, 2) Monitoring and Performance of Subgrantees, 3) Corrective Action Plan (CAP), and 4) School Closure. According to the protocol, subgrantee monitoring will include desk and onsite reviews by OSC and Office of Grants Management staff. Desk reviews will occur throughout the grant period while onsite monitoring will occur in fall and spring for first-year recipients and in the fall only in subsequent years. All recipients of the CSP subgrant will be considered high-risk and will be subject to the same monitoring. The OSC desk reviews will include ongoing review of documents from the subgrantee (e.g., policies and procedures, quarterly reports, annual performance reports) and sponsor (e.g., monthly financial and enrollment reports). Onsite, monitors will review subgrantee financial transactions and policies and procedures, observe classrooms, confirm data collected to demonstrate progress toward program objectives, and interview stakeholders. The Office of Grants Management will approve cash requests, review and approve final expenditure reports, provide technical assistance for fiscal matters, and review audit reports.

During interviews with the site visit team, the ODE described its unified plan for subrecipient monitoring in which all Federal entitlement programs conduct onsite monitoring once per year. The process is the same regardless of what grant is monitored. The ODE plans to include CSP into its unified subrecipient monitoring.

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
	<p>The site visit team notes that the unified subrecipient monitoring described by the ODE may not be sufficient for purposes of the grant as CSP monitoring goes beyond what is required for Title I or IDEA (e.g., lottery and admissions process, allowable costs, labeling equipment purchased with grant funds). Furthermore, the unified plan differs from the protocol provided to the site visit team. Finally, the site visit team notes that the current protocol is not a tool that would allow the ODE to assess subgrantee performance and compliance.</p> <p>--</p> <p>December 2017 site visit:</p> <p>The ODE completed development and received ED approval of its monitoring protocol in June 2017. In developing its protocol, the ODE crosswalked the monitoring indicators with the various grant requirements (i.e., assurances, Federal guidance, Ohio’s performance measures, and AUPs) so that every indicator in the rubric aligns to a requirement that the ODE must monitor to ensure subgrantee compliance. The ODE also referenced other state’s monitoring rubrics in developing its protocol.</p> <p>The monitoring rubric contains 33 indicators in the areas of:</p> <ul style="list-style-type: none"> • Program compliance • Fiscal compliance • Grant implementation • Performance on goals and objectives • Quality practices (implementation rubric only) <p>The monitoring protocol includes fall desk reviews and spring site visits annually and provides for corrective action plans as necessary. At the time of the site visit subgrantees were submitting data for the desk reviews. See Indicator 2.5 for more information.</p>
<p>High-Risk Specific Condition 7:</p> <p>In consultation with the Department, the ODE shall ensure it maintains and updates annually a centralized listing of all public charter schools that is easily accessible to the public—the listing will include the names of authorizers and show school performance under the state accountability framework as well as additional information that will help the public understand overall school performance (e.g., finance, operations, EMO relationships).</p>	<p>March 2017 site visit:</p> <p>The Community Schools Directory available on the SEA’s website includes a list of public charter schools, authorizers’ names, a link to the Ohio School Report Cards landing page where stakeholders could search for a school’s report card, and a link to an Organization Search landing page where additional information about overall school performance could be searched.</p> <p>During interviews the site visit team, the ODE acknowledged that the multiple landing pages was not the</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
	<p>ultimate goal and expressed interest in developing a centralized listing that would meet the requirements for High-Risk Specific Condition 7.</p> <p>--</p> <p>December 2017 site visit:</p> <p>As a result of this high-risk condition, the ODE undertook a project to design and add to its website a directory of community schools, sponsors, and operators. The project includes an interactive directory that allows parents and other users to easily find information about each school's location, educational focus, enrollment, sponsor, operator, five-year forecast, and Ohio School Report Card. Directories of these data elements for all community schools are also available in Excel spreadsheet format from links provided on the page. At the time of the site visit, while the data lists were public, the interactive directory had not yet gone live due to technical problems with including the 5-year forecasts for each school. The centralized listing was posted publicly on December 14, 2017.</p>
<p>High-Risk Specific Condition 8:</p> <p>The ODE shall be prohibited from awarding any CSP SEA grant funds to dropout recovery charter schools until the ODE has developed and received the Department’s approval on a plan to ensure that any subgrants to dropout recovery charter schools go to only schools that demonstrate the capacity to deliver a high-quality program and are authorized by the highest quality authorizers.</p>	<p>March 2017 site visit:</p> <p>The ODE does not intend to include dropout prevention and recovery schools as eligible subgrant applicants. The Notice of Grant Opportunity dated February 15, 2017 expresses this intention with the note, “Please note: Dropout Prevention and Recovery schools are not eligible for funding during this application cycle. Similarly, eSchools are not eligible for funding by the Ohio CSP subgrant.” The grantee will submit notification to ED in writing regarding their intent to exclude dropout prevention and recovery schools for the duration of the grant.</p> <p>--</p> <p>December 2017 site visit:</p> <p>No change observed from the March 2017 site visit. The April 2017 RFA (p. 6) states that dropout prevention and recovery community schools as defined in Ohio statute, as well as e-schools as defined in Ohio statute, are ineligible applicants for the subgrant.</p>
<p>Specific Condition 1 (revised from September 28, 2015 Grant Award Notification):</p> <p>Given the time necessitated to conduct our supplemental review, the Department will work with the ODE to revise the ODE’s CSP SEA grant budget. As of now, grant funds in the amount of \$32,671,373 have been awarded and this includes funding in the amount of \$7,118,964 for FY 15,</p>	<p>March 2017 site visit:</p> <p>The ODE has controls in place to ensure it does not spend more grant funds than allowed in each fiscal year and systems to track funds and activities separately. However, this specific condition is largely irrelevant because no grant funds were spent in Year 1 and Year 2 spending will not exceed the award. On October 1, any unobligated funds will automatically carry over to the next year and become Year 3 dollars and the ODE will have access to the entire</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>\$13,886,625 for FY 16, and \$11,665,784 for FY 17. Additional funding for continuations may be modified by the Department over the duration of the five-year grant based on the ODE’s performance and compliance with the specific conditions. The ODE may not obligate or disburse funds designated for future fiscal years until the start of that fiscal year. The ODE must track funds and activities separately for each of the three fiscal years that have already been awarded. Consistent with the current grant budget, for FY 16, the ODE will be awarded an additional \$1, and for FY 17, the ODE will be awarded the remaining continuation funds for FY 17, contingent on satisfactory grant performance. FY 18 and FY 19 continuation funding is contingent on overall grant performance.</p>	<p>\$32M. ED is no longer concerned that the ODE will overspend Year 1 or Year 2 grant funds. However, the site visit team notes that the dollars awarded in FY 15 have a limited shelf-life and will revert to the Treasury if unused within five years.</p> <p>--</p> <p>December 2017 site visit: The ODE’s grant budget was revised in October 2016 and again in Fall 2017. For the 2017 revision, the ODE originally submitted a proposed budget to ED on September 1, 2017, and after multiple communications between the ED and ODE to review and revise, it was approved by ED on November 1, 2017. Currently, the total grant award over five years is \$49,380,957. After a Year 1 award of \$32,671,373, the ODE was awarded \$1 in each of Years 2 and 3. For Year 4 \$1 is budgeted and for Year 5 \$16,709,581 is budgeted. The grantee had not exceeded its grant budget for any year to date.</p>
<p>Specific Condition 2 (GAN):</p> <p>The total recommended award amount of \$71,058,319 is an estimate based on the subgrant projections included in the approved application. The Department reserves the right to reduce continuation amounts based on performance, including actual need for additional funding. The ODE should consider the possibility of a reduction in continuation funding when incurring administrative costs.</p>	<p>March 2017 site visit: The ODE conservatively estimated the number of subgrants that may be awarded in the current budget period and planned to allocate less than 5 percent to administrative costs. The ODE has elected to use administrative funds solely to cover the cost of the independent monitor and is not charging rent, salaries, or other expenses to the grant. At the time of the site visit, the CFO indicated that \$110,000 had been allocated but spending will not occur until July 1.</p> <p>--</p> <p>December 2017 site visit: The ODE’s request for a revised grant budget included new projections of eligible subgrant applicants. The original estimate to fund 127 subgrantees over five years was reduced to approximately 68 subgrantees. The total grant award was reduced from \$71,058,319 to \$49,380,957.</p>
<p>Specific Condition 3 (GAN):</p> <p>The ODE shall ensure that the Authorizer Quality Performance Review system continues to include periodic review and evaluation, at least once every five years, throughout the life of the grant. Although the Authorizer Quality Performance Review system will look at periodic review and evaluation, it is not clear that effective authorizer</p>	<p>March 2017 site visit: Although the ODE requires authorizers to conduct reviews of charter schools at least twice a year, those reviews do not meet ED’s requirements for periodic review and evaluation which needs to be a meaningful high-stakes review that could result in the authorized public chartering agency taking appropriate action or imposing meaningful consequences on the charter school, if necessary. ED is concerned that such reviews may not take place at least</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>ratings require this element to be met. Therefore, the ODE shall ensure that an authorizer that is not performing periodic reviews and evaluations as required by Absolute Priority 1 will be designated ineffective for purposes of the CSP program and that no subgrants will be awarded to charter school developers with charter schools authorized by an authorizer rated as ineffective.</p>	<p>once every five years for charter schools with terms that exceed five years. At the time of the site visit, the ODE could not demonstrate that authorizers that are not performing periodic reviews and evaluations at least once every five years are designated as “Ineffective” in the sponsor evaluation process and no subgrants will be awarded to developers with agreements with those authorizers.</p> <p>--</p> <p>December 2017 site visit: In order for a sponsor’s schools to be eligible for the CSP grant, the sponsor must receive an overall rating of Effective or Exemplary on the sponsor evaluation and meet or exceed (scoring a 3 or higher) on the “Oversight and Evaluation: Site Visit Reports” and “Termination and Renewal Decision-making: Renewal and Non-renewal Decisions” standards in the Sponsor Quality Practices Rubric. See Indicator 2.1 for additional information.</p>
<p>Specific Condition 4 (GAN):</p> <p>The ODE’s proposed definition of high-quality charter school is approved for use for purposes of this CSP SEA grant with the following conditions:</p> <ul style="list-style-type: none"> a. The ODE must use its definition of high-quality charter school when designating charter schools as high-quality in relation to the CSP SEA grant; and b. The ODE must be able to demonstrate that any charter school that the ODE designates as a high-quality charter school for purposes of this CSP SEA grant has no significant compliance issues. Per the standards described in the ODE’s approved application, this would be demonstrated through evidence that: <ul style="list-style-type: none"> i. the charter school is in good standing with its authorizer; and ii. audits of the charter school conducted by the State Auditor or other independent auditor do not identify any significant compliance issues. 	<p>March 2017 site visit: During interviews with the site visit team, the ODE could not articulate a plan for using its definition of high-quality charter school in relation to the CSP grant. However, the ODE’s approved definition of high-quality charter school must be used anytime such schools are referenced in the grant application.</p> <p>Every charter school has a compliance review every year which is reviewed as part of the sponsor evaluation process. A vendor was contracted to conduct sponsor compliance reviews for the ODE. The vendor reviews each sponsor’s compliance with applicable rules and laws and randomly selects 10 percent of the sponsor’s schools for a similar compliance review. The program office reviews each school’s compliance review but needs to formalize the process.</p> <p>--</p> <p>December 2017 site visit: The ODE’s April 2017 RFA encourages applicants to consider a community school model with a track record of high-quality academic performance and specifies performance measures that are used to identify a high-performing community school model for the purposes of Ohio’s CSP grant. These performance measures for high quality are the same that the State applies to all schools and uses in identifying schools for best practices. However, the ODE’s reference to high-quality charter schools in the</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
	RFA does not include details about needing to be in good standing with the authorizer and not having any significant compliance issues.
<p>Specific Condition 5 (GAN):</p> <p>Prior to approving the use of weighted lotteries by charter school subgrantees under CSP grant award (U282A150023), the ODE must submit current information that demonstrates that State law permits the use of weighted lotteries consistent with applicable Federal laws and regulations, and the ODE must receive approval from the Department to move forward. For guidance on how the ODE can demonstrate that State law permits the use of weighted lotteries taking into account educationally disadvantaged students, please see section E of the CSP Nonregulatory Guidance that is available at http://www2.ed.gov/programs/charter/legislation.html</p>	<p>March 2017 site visit:</p> <p>The ODE does not intend to seek approval for the use of weighted lotteries by charter school subgrantees under this CSP SEA grant. The grantee will submit notification of this intent to ED in writing.</p> <p>--</p> <p>December 2017 site visit:</p> <p>No changes were observed during the December 2017 visit; the ODE was not allowing subgrantees to use a weighted lottery and did not intend to seek approval for this option.</p>
<p>Sources: <i>March 2017</i> ED letter to ODE dated September 14, 2016; Grant Award Notification U282A150023 Action Number 4; ODE website, Ohio’s Public Charter School Subgrant Monitoring Protocol; Notice of Grant Opportunity dated 02/15/17; Plan for the Ohio Grant Implementation Advisory Committee; RFP for Community School Program (CSP) Independent Monitor; Quarterly Performance Reports; Semiannual Performance Report; draft Request for Applications; draft Agreed-Upon Procedures; Community School Sponsor Evaluation Update Memo</p> <p><i>December 2017</i> Emails between ODE and ED on invoices; September 1, 2017 email from ODE to ED with proposed budget revision; November 1, 2017 from ED to ODE approving budget revision; Kennedy Cottrell Richards engagement letter (May 31, 2017); Independent Accountant’s Report on Applying Agreed-Upon Procedures (August 14, 2017); ODE Progress Reports submitted to ED on 4/14/2017, 6/29/2017, and 9/29/2016; email from ED to ODE approving shift in quarterly reporting dates from 1st to 15th of month (October 2017); Ohio Grant Implementation Advisory Committee meeting minutes from March 30, 2017, April 13, 2017, and September 29, 2017; Governance Document for the Ohio CSP Grant Implementation Advisory Committee; Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017); Ohio CSP Grant Administration Comprehensive Plan; Ohio’s CSP Subgrant Review and Award Process, Notice of Grant Opportunity, 2018 Ohio Charter Schools Program Sub-Grant Competition; CSP Grant Requirements Crosswalk; 4/5/17 email from ED to ODE approving RFA; 5/17/17 email from ED to ODE approving Comprehensive Plan; Charter School Program Grant Monitoring Rubrics; Indicators in the Rubric Spreadsheet; 6/28/2017 email from ED to ODE approving monitoring protocol; Directory of Community Schools, Sponsors and Operators; Ohio High Risk Condition Gantt Chart updated 1.12.18; Grant Award Notification Action Number 8; Budget Reduction Memo for FY 17 NCC Slate</p>	

4. OVERSIGHT OF CHARTER SCHOOL AND MANAGEMENT ORGANIZATION RELATIONSHIPS

This section of indicators is provided to assist SEAs to assess their own policies, practices, and procedures to ensure that charter school and management organization conditions do not promote the risks identified in the *Nationwide Assessment of Charter and Education Management Organizations Final Audit Report, ED-OIG/A02M0012, September 2016* as it pertains to CSP funds. Additionally, this section of indicators is intended for SEAs to use when requesting information from the CMOs and EMOs in their state, such as data submitted through the U.S. Department of Education *EDFacts* submissions. These indicators were added as part of FY 18 monitoring; the following tables therefore only contain data based on the December 2017 site visit.

- Monitor the relationships between charter schools and management organizations, including financial risk, lack of accountability over public funds, and performance risks
- Ensure accurate, complete, and reliable charter school data collected for *EDFacts* data files

Indicator 4.1: MITIGATING RISK OF CHARTER SCHOOL RELATIONSHIPS WITH MANAGEMENT ORGANIZATIONS. The SEA monitors charter schools and their management organizations to mitigate risks associated with those relationships, with respect to 1) financial risk; 2) accountability over federal funds; and 3) performance risk.

Table 4.1: Mitigating Risk of Charter School Relationships with Management Organizations

Risk Area	Are policies, practices, or procedures in place?	Summary How does the SEA monitor, assess, and mitigate risk between charter schools and management organizations?
Operating Responsibilities: How does the SEA ensure the relationships between charter school and their management companies mitigate risk?		
<i>Fiscal authority</i> – charter school boards should not cede fiscal authority to management organizations	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>December 2017 site visit:</p> <p>As part of the subgrant application process, the ODE requires that subgrantee applicants ensure and attest that any management organizations “remain at ‘arm’s length’ and [have] no involvement with the administration of the subgrant (see B-13 in the Federal CSP Nonregulatory Guidance dated January 2014).”</p> <p>To assess these relationships, the subgrant application process requires applicants to submit any contracts they have executed with a management organization for review. The terms of these operator contracts vary widely across charter schools. ORC 3314.024 requires that a management organization which receives more than 20 percent of a charter school’s annual gross revenues must provide a detailed breakdown of the cost of goods and services it provides (a review of operator contracts found some contracts which stipulate as high as a 97 percent continuing fee of school revenues). Anything below the 20 percent threshold does not require this level of detail and therefore makes it more challenging to compare the relative cost and value of operators across charter schools.</p> <p>Of the current subgrantees, all administer the CSP subgrant directly. However, outside of the CSP subgrant, management organizations at two of the charter schools hold fiduciary duties for the schools, carrying out the day-to-day implementation of financial policies and procedures. This variation in management organization involvement and control of financial operations may increase the potential for risk of abuse with funds. While the State has procedures in place to ensure fiscal authority is maintained by charter school boards, it is not clear that these procedures are sufficient to mitigate risk.</p>
<i>Accountability over public funds</i> – recipients are required to have internal controls to properly account for and spend	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>December 2017 site visit:</p> <p>As part of the application process, subgrantees agree to use funds in accordance with applicable Federal and State laws and plans and agree to administer CSP funds in compliance with those provisions. They are also required to maintain records for three years following completion of the grant (per 2 CFR</p>

Table 4.1: Mitigating Risk of Charter School Relationships with Management Organizations

Risk Area	Are policies, practices, or procedures in place?	Summary How does the SEA monitor, assess, and mitigate risk between charter schools and management organizations?
Federal and other public funds		200.333), including details on the amount of funds and how they were used. Finally, applicants must assure that they will have effective financial management systems which conform to the standards present in 2 CFR 200.302, which stipulates the ability to report financial data using means that verify compliance with program regulations and maintain effective internal control over the operations of the approved grant.
<i>Performance risk</i> – charter school boards should not cede operational authority to management organizations	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>December 2017 site visit:</p> <p>There is wide variation in the extent of operational authority charter schools have ceded to management organizations. Among the current CSP subgrantees, hiring is controlled by the management organization in all cases, though school personnel are considered employees of the charter schools in two of these cases (school employees –i.e., teachers and Principal—are considered management organization staff at the third charter school). While the board still has the authority to make the final employment determination in these cases, its ability to oversee operations may be hindered by affording the management organization so much latitude. Cases where school staff are considered management organization employees raises concerns about how the ODE is ensuring all educators are public school teachers and adhering to State requirements.</p> <p>This ceding of authority is also often an issue with regard to ownership of assets and intellectual property. For two of the subgrantees (and numerous other charter schools in a broader review of operator contracts), operator contracts give ownership of all curricular and intellectual property assets to the management organization. This poses a challenge to charter school autonomy and sustainability should the charter school decide to form a relationship with a different management organization. With regard to CSP, processes are not currently in place to ensure these types of assets are not purchased with CSP funds, as both tangible and intangible uses of CSP funds must remain in the public domain.</p>
Internal Controls: How does the SEA ensure that a charter school’s internal controls are sufficient to mitigate risk?		
<i>Conflict of interest (COI) policies</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>December 2017 site visit:</p> <p>The ODE requires subgrant applicants to submit their conflict of interest policy with the subgrant application. For current subgrantees, these policies detail that board members must disclose any existing conflicts of interest, recuse themselves from dealings related to a COI, and avoid apparent and actual conflicts of interest as outlined in EDGAR 34 CFR 75.525. Additionally, subgrantees assure that they will also abide by COI policies as</p>

Table 4.1: Mitigating Risk of Charter School Relationships with Management Organizations

Risk Area	Are policies, practices, or procedures in place?	Summary How does the SEA monitor, assess, and mitigate risk between charter schools and management organizations?
		detailed in 34 CFR 75.525 as well as with all Ohio statues and administrative rules pertaining to COI.
		Monitoring of community schools is largely the responsibility of sponsors. The types of review sponsors conduct are not likely to identify breeches to COI policy. Monitoring by the ODE of subgrantees had not yet occurred at the time of the December 2017 visit. There was no indication that the ODE had provided sponsors guidance on assessing and addressing COI violations.
<i>Segregation of duties policies</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	December 2017 site visit: Few sponsor contracts or management contracts detail policies for segregation of duties. The ODE did not have processes in place to monitor or examine schools’ internal controls in this area.
<i>Related-party transactions</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	December 2017 site visit: Sponsor contracts and board COI policies prohibit related-party transactions on the part of board members or school personnel. However, no such prohibitions are applicable to employees of management organizations. Given the close ties management organizations have with schools, this could pose a risk to charter school operations.
		The ODE requires subgrant applicants to state how agreements with management organizations were formed and whether it was an arms-length agreement, but a review of responses on the CMO/EMO Questionnaire suggests the role of management organizations in the formation of the schools is underrepresented. School leaders at all of the subgrantees had previously worked with or for the management organization, and board members at two of the three schools had prior relationships with management organization employees or with a different charter school that was also managed by that organization.
Financial Risks: How does the SEA ensure that charter school and management company policies do not pose a financial risk?		
<i>Waste, fraud, and abuse – recipients must maintain policies that ensure against the waste, fraud, or abuse of public funds</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: Much responsibility for preventing waste, fraud, and abuse rests with sponsor reviews, which the ODE has little influence over. However, in order to receive a CSP subgrant, applicants must have support from their sponsor, who in turn must sign subgrant assurances on how they will uphold the purpose of the grant and oversee the subgrantee. As part of these assurances, the sponsor agrees to monitor the community school’s compliance with all laws applicable to the school and terms of the contract. Should the school be found to have issues of noncompliance or unresolved audit findings, the sponsor must take steps to

Table 4.1: Mitigating Risk of Charter School Relationships with Management Organizations

Risk Area	Are policies, practices, or procedures in place?	Summary How does the SEA monitor, assess, and mitigate risk between charter schools and management organizations?
		<p>intervene in the school’s operation to address and correct those issues.</p> <p>A second procedure that helps mitigate waste, fraud, and abuse of CSP funds is a result of a condition placed on the ODE’s CSP grant. The route payment condition requires that all subgrantees must submit a PCR with proper documentation to obtain reimbursement from the ODE. The ODE staff review each PCR prior to processing the payment to ensure the allocability, allowability, and reasonableness of the CSP expenses. While not a voluntary process adopted by the ODE, the effect of this detailed review of subgrant expenses is to reduce the potential for waste, fraud, or abuse of CSP funds.</p>
<p><i>Procurement standards – recipients must use their own procurement procedures that reflect applicable state and local laws, provided that procurements conform to applicable Federal law</i></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>December 2017 site visit:</p> <p>As part of the application process, subgrantees must agree to utilize competitive bidding practices in compliance with applicable procurement regulations. Additionally, the subgrant assurances state that a subgrantee must comply with the procurement standards set forth in the U.S. Department of Education’s regulations which require Federal subgrant recipients to develop written procurement procedures and to conduct all procurement transactions “in a manner to provide, to the maximum extent possible, open and free competition. No employee, officer or agent of the community school may participate in the selection, award or administration of any contract supported by federal funds if a real or apparent conflict of interest exists.”</p>
<p><i>Management organization contracts – management contracts should ensure that governing boards retain control over funds and operations</i></p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>December 2017 site visit:</p> <p>As detailed above, a review of operator contracts shows wide variation in the extent of control governing boards retain over charter school funds and operations. These types of contracts raise questions about the extent of internal controls charter schools have in place to ensure proper oversight and management of grant funds and operations. Among the current CSP subgrantees, all technically held control and oversight of both financial and operational aspects of the charter schools. In practice, the management organization contracts afforded operators a great deal of control, from financial, to facilities, to hiring, to the educational plan. Contracts used suggestive language in reference to board authority rather than definitive statements (e.g., “[t]he Board may make final decisions on matters related to the operation of the school”). The ODE expects these types of relationships to decline over time. With the provisions afforded the State under HB2, the ODE must now</p>

Table 4.1: Mitigating Risk of Charter School Relationships with Management Organizations

Risk Area	Are policies, practices, or procedures in place?	Summary How does the SEA monitor, assess, and mitigate risk between charter schools and management organizations?
		provide operator rankings, which they expect will strengthen quality overall.
<i>Misuse of funds – recipients of Federal and other public funds are required to ensure they have internal controls to prevent putting funds at risk for misuse</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: The ODE requires subgrantees to manage grant funds according to project aims and all relevant statutes and policies. Additionally, in accepting grant funds, the subgrantee agrees that the ODE has the authority to take administrative sanctions, including revoking or terminating grant funds, as necessary if applicable laws or assurances are not being met, as allowed under 2 CFR 200.338, 34 CFR 74.62 and Ohio Revised Code Section 3301.07 (C). The ODE also provides guidance to subgrantees in the Fiscal Management Plan on allowable expenses to prevent misuse at the outset of awards.
Federal Funding Sources: Can the SEA connect and track each charter school in the State to each Federal-funding source?		
Title 1 Formula grant: --Improving Basic Programs Operated by Local Educational Agencies <i>(Catalog of Federal Domestic Assistance 84.010)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: All Federal pass-through grants and State grants are viewable in the CCIP. The system maintains records back to 2010. Users can view drawdowns, carryover, and other grant-related transactions based on their user-status in the CCIP. The CCIP is a grant-based system, meaning information is stored by grant rather than school or other entity. As such, it is possible to investigate which entities receive which grants but not immediately possible to track what grants a particular school receives. To examine school-based relationship requires additional manipulation of the data outside of the CCIP. Title 1 grants are viewable in this system.
SIG Formula grant: --School Improvement Grants <i>(Catalog of Federal Domestic Assistance 84.377)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: The ODE can connect and track SIG Formula grants to charter schools in the CCIP.
IDEA Formula grant: --Individuals with Disabilities Education Improvement Act of 2004, Part B <i>(Catalog of Federal Domestic Assistance 84.027)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: The ODE can connect and track IDEA grants to charter schools in the CCIP.
CSP Discretionary grants: --State Entity Grants <i>(Catalog of Federal Assistance 84.282A)</i> former State Educational Agency (SEA) under NCLB	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	December 2017 site visit: Current and prior SEA CSP grants are trackable in the CCIP. However, as the system only tracks Federal pass-through and State grants, individual CMO or Non-SE CSP grants are not viewable in the CCIP. The CCIP is currently structured as a risk-based grant system. The ODE hopes to transition in the next few

Table 4.1: Mitigating Risk of Charter School Relationships with Management Organizations

Risk Area	Are policies, practices, or procedures in place?	Summary How does the SEA monitor, assess, and mitigate risk between charter schools and management organizations?
--Non-State Entity Grants (Catalog of Federal Assistance 84.282B) former Non-State Educational Agency Grant under NCLB --CMO Grants, Charter School Replication and Expansion Grants (Catalog of Federal Domestic Assistance 84.282M)		years to a system that allows for the organization of data by entities in addition to grants (e.g., a school, a district, a sponsor).

Sources: *December 2017 Ohio-Monitoring-Rubric; ORC 3314; Statement of Sponsor Assurances; Subgrant Statement of Assurances; Review of Subgrant Applications; Review of Sponsor Contracts; Review of Operator Contracts; Ohio-CSP-Grant-Comprehensive-Plan; CSP Fiscal Management Plan, Charter Management Organization/Education Management Organization (CMO/EMO) Questionnaire; 3.4 Administration of CSP Funds Nov 2017; Indicator 3.5 Use of CSP Funds*

Indicator 4.2: OVERSIGHT OF EDFACTS DATA COLLECTION FOR MANAGEMENT ORGANIZATIONS. The SEA ensures accurate, complete, and reliable charter school data is collected for ED*Facts* data files.

Table 4.2: OVERSIGHT OF EDFACTS DATA COLLECTION FOR MANAGEMENT ORGANIZATIONS		
ED <i>Facts</i> Files	Is this data currently collected throughout the state?	Summary What, if any, are the existing data sources for these elements? How is the SEA collecting and reporting this data?
C190 — Charter Authorizer Directory: Can the State connect each charter school in their State to the authorizers from the Charter Authorizer Directory?		
<i>C190 - Can the state connect each charter school in the state by type of authorizer from the Charter Authorizer Directory? (ED<i>Facts</i> data collection, Charter Authorizer Directory, file spec C190)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: The ODE requires sponsors to submit and maintain data for the C190 file in the Ohio Education Directory System (OEDS). The ODE staff review and approve the charter school data submitted by sponsors annually. This approved data is then pulled by the IT department to form the ED <i>Facts</i> file for submission.
C196 — Management Organizations Directory: Does the State collect the following information on all CMOs and EMOs that operate charter schools?		
<i>Management Organization Name</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: Data on management organizations was not previously collected by the ODE. In order to obtain this data, the ODE administered a survey to school directors and treasurers that collected data on both operator characteristics and relationships with schools. Survey data was reviewed, validated, and followed up on by the ODE staff to ensure a 100 percent response rate and complete information.
<i>Organization Employer Identification Number (EIN)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: EINs were collected through the survey described above.
<i>Organization address location</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: Operator physical locations were collected through the survey.
<i>Organizations address mailing</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: Operator mailing addresses were collected through the survey.
<i>Organization management type (i.e., for profit, not-for profit, other)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: Management type was identified by survey respondents. The ODE is planning to embed these elements into OEDS to avoid the significant burden of survey administration in future years.
C197 — Crosswalk of Charter Schools to Management Organizations: Can the State connect the charter schools in their state to the management organizations from the Management Organization Directory described above (FS196)?		
<i>C197 – Crosswalk of Charter Schools to</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: The ODE did not previously have a complete record of the connections between charter schools and operators. The linkages

Table 4.2: OVERSIGHT OF EDFACTS DATA COLLECTION FOR MANAGEMENT ORGANIZATIONS

<i>Management Organizations</i>		were established by schools’ responses to the survey described above. Going forward, the ODE plans to integrate these elements into OEDS so schools can maintain current information on an ongoing basis.
C198 — Charter Contracts: Does the State assign and record a unique identification number to the contract (or charter) that authorizes the charter school to operate in the State under the State’s charter school legislation? Does the State collect the approval and renewal dates of such contracts?		
<i>C198 — Charter contract ID number</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: This was a new data element for the State. To create the element, the ODE concatenated the school’s IRN, the sponsor’s IRN, and the contract start date.
<i>C198 — Charter contract approval date</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: This element was already collected by the ODE and is updated annually when contract renewals come in during June.
<i>C198 — Charter contract renewal date</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: The same process was followed as for contract approval date.
Data Validation		
<i>Data Validation—Can the State validate charter school data submitted to ED Facts in file spec (FS) C029-Directory?</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: ED Facts data for the 2016-17 school year was not yet publicly available to independently validate the quality of charter school data submitted to ED Facts. The ODE staff reported working iteratively on the charter school data submission to ensure the files were formatted correctly and contained the correct information. An internal validation process was also in place whereby the ODE staff cross checked the information to make sure it aligned across different sources. Data also went through a review by the legal team, who verified through the Secretary of State website that schools, operators, and sponsors were valid legal entities. The ODE was late with its 2016-17 ED Facts submission due to the extent of effort required to collect and validate these new data elements.

Sources: *December 2017 Community-School-Directory; Operators Public List*

APPENDIX A DATA COLLECTION PROCESS AND METHODOLOGY

The CSP Monitoring Plan is being conducted with the assistance of WestEd (Contract # ED-CFO-10-A-0074). The plan assesses grantee performance and compliance using indicators based on Federal statute, EDGAR, non-regulatory guidance, and application requirements. A monitoring handbook was provided to the grantee in advance of the site visit and used to guide the monitoring process. The monitoring handbook specifies each monitoring indicator, its statutory or other sources, criteria for meeting each indicator, guiding questions, and acceptable evidence.

In conducting this comprehensive review, the site visit team carried out a number of major activities. These included:

- Reviewing key background documents provided by ED on the State’s CSP grant, including the grant application, grant award notice, and annual performance reports
- Researching and synthesizing other available information about the State grantee’s charter school program including relevant statutes; reports and evaluations; newspaper articles; and other data from government, research, and advocacy organizations
- Consulting with ED prior to the site visit about issues of specific concern in the State grantee’s administration of the CSP
- Arranging the site visit in coordination with State and charter school officials to identify State officials for interviews and select subgrantees to visit
- During the site visit interviews, collecting evidence of the State grantee’s compliance or performance with respect to each indicator. Materials and artifacts were collected from the grantee to document compliance with Title V, Part B Public Charter Schools Program statutes, regulations, and guidance
- Analyzing the evidence obtained and collecting any follow-up information necessary to produce this report

Two monitoring visits to Ohio occurred in 2017. The first site visit was conducted over a three-day period from February 27 to March 1, 2017. The site visit team met with members of the Ohio Department of Education (ODE) including members of the Office of Community Schools (OCS), Executive Director of the Center for Student Support and Education Options, Executive Director of Federal and State Grants Management, Assistant Director of the Office of Federal Programs, Chief Legal Counsel, Assistant Legal Counsel, and Chief Financial Officer. The team did not visit subgrantee schools as a part of this site visit because no schools were funded at the time of the visit.

The second site visit occurred from December 5-8, 2017. The site visit team again met with members of the ODE, including members of the OCS, the Executive Director of the Center for Student Support and Education Options, the Executive Director of Federal and State Grants Management, the Assistant Director of the Office of Federal Programs, and the Chief Financial Officer. As the first subgrant competition was completed between visits, the team also visited all three current subgrantees:

- *United Preparatory Academy East*: A Thomas B. Fordham Foundation-authorized school designed for grades K–5 that provides a college-prep education for underserved students of Columbus. The school opened in the 2017–18 school year and was awarded CSP implementation funds. At the time of the site visit, the school served 48 students in two Kindergarten classrooms.
- *South Columbus Preparatory Academy*: The school opened in the 2017–18 school year. At the time of the visit, the school served 79 students in grades K–4. The school is designed to serve 400 students in grades K–8, utilizing a curriculum model and philosophy that has been successful at three other schools in the state. The school was awarded CSP implementation funds.
- *Southwest Ohio Preparatory School*: As with the other subgrantees, the mission of this school is to prepare students for college and create a culture of high expectations. The school opened in the 2017–18 school year, serving grades K–8. At the time of the visit, 236 students were enrolled. The school was awarded CSP implementation funds.

At the three subgrantees, the site visit team interviewed school leaders and Treasurers. At select sites, the team also interviewed operator representatives, board members, a parent, and consultants.

After the visit, the site visit team and the grantee engaged in follow-up data collection to clarify unanswered questions and request additional information.

This report is an analysis and assessment of the data, grant award documents, interviews, and information gathered prior to, during, and following the December 2017 site visit to the State grantee. Findings in this report update those from the October 2017 monitoring report and reflect the site visit team’s data collection, observations, and analysis of the State grantee’s compliance and performance under the CSP grant from the beginning of the current grant period to the time of the site visit. Source documentation is noted within each indicator table. Additional notable documents (i.e., those that are related to identified promising practices or implementation issues) are identified below in Appendix C.

A draft copy of the monitoring report is provided to the grantee for review, with a request for technical edits and corrections accompanied by supporting documentation. The grantee’s response is included as an appendix to this report and carefully considered before the monitoring report is finalized. Hence, the final report will take into consideration the grantee’s response as well as all of the other evidence gathered during the monitoring process.

The main purpose of the grantee review process is to make the report as accurate as possible to assist Department staff in monitoring activities. Grantee responses are used to clarify or correct details about policies, practices, or procedures occurring up to the time of the site visit and may result in revisions to observations and ratings, if justified. However, if the grantee submits evidence of new or changed policies, practices, or procedures that occurred after the site visit, that information will not be reflected in the report findings and will only be included in the appendix. This additional information would be beyond the scope of the site visit and would therefore not influence any observation or rating.

APPENDIX B
INDICATOR PERFORMANCE SUMMARY FROM OCTOBER 2017 MONITORING
REPORT (MARCH 2017 SITE VISIT)

The following table shows the rating and recommendations for each indicator on which the grantees were observed as a part of the March 2017 site visit. The table also provides details about specific issues that affected any rating, promising practices, or other noteworthy highlights. The table is color-coded to provide a quick overview of the grantee’s associated risk in meeting the CSP grant requirements. The color-coding key is below the table.

Indicator	Rating	Recommendation	Notes (implementation issues, promising practices, noteworthy highlights)
Indicator 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.	Partially meets the indicator	Recommend Technical Assistance	Draft RFA does not include all required descriptions and assurances.
Indicator 1.2: ELIGIBLE APPLICANTS.	Fully meets the indicator	None	Requirement for sponsor approval goes beyond notification.
Indicator 1.3: DEFINITION OF CHARTER SCHOOL.	Does not meet the indicator	Requires Technical Assistance	Definition in draft RFA does not completely align with Federal definition (e.g., clauses on IDEA and elementary/secondary program missing).
Indicator 1.4: PEER REVIEW.	Does not meet the indicator	Requires Technical Assistance	Oversight of lotteries is indirect, through sponsor evaluations. Draft peer review documents are incomplete and inconsistent in desired qualifications for reviewers and methods for notifying, selecting, and training reviewers. Plans for using peer reviews to select subgrantees are undeveloped and do not take into account provisions in grant application (e.g., CEDO involvement, Recovery District Reserve).
Indicator 1.5: PROGRAM PERIODS.	Fully meets the indicator	None	State grant system only allows annual grant periods.
Indicator 2.1: QUALITY AUTHORIZING PRACTICES.	Partially meets the indicator	Recommend Technical Assistance	Robust authorizer (sponsor) evaluation framework is in place. However, high-stakes reviews may not take place at least once every five years for some community schools and technical assistance to authorizers may be limited.

Indicator 2.2: FLEXIBILITY AND AUTONOMY.	Does not meet the indicator	Recommend Technical Assistance	Flexibility and autonomy are outlined in existing state statute, however, there are potential implementation issues regarding conversion charter schools.
Indicator 2.3: SUBGRANTEE QUALITY.	Does not meet the indicator	Requires Technical Assistance	
Indicator 2.4: PLAN TO SUPPORT EDUCATIONALLY DISADVANTAGED STUDENTS.	Does not meet the indicator	Requires Technical Assistance	
Indicator 2.5: SUBGRANTEE MONITORING.	Does not meet the indicator	Requires Technical Assistance	
			specific monitoring content.
Indicator 2.6: DISSEMINATION OF INFORMATION AND BEST PRACTICES.			
			identification of best practices.
Indicator 3.1: STATE- LEVEL STRATEGY AND VISION.			
			stakeholders.
Indicator 3.3: ALLOCATION OF CSP FUNDS.			
Indicator 3.4: ADMINISTRATION OF CSP FUNDS.			

Indicator 3.5: USE OF GRANT FUNDS.			
Indicator 3.6: LEA DEDUCTIONS.			
Indicator 3.7: TRANSFER OF STUDENT RECORDS.			
Indicator 3.8: RECORDKEEPING.			
Indicator 3.9: COMPLIANCE WITH GRANT CONDITIONS.	Does not meet the indicator	Requires Technical Assistance	Sufficient progress has not been made on several high-risk conditions including High-Risk Specific Condition #5 which impacts the timeline for implementing the RFA.

Indicator Color Coding Key
Fully meets the indicator
Largely meets the indicator
Partially meets the indicator
Does not meet the indicator.

**APPENDIX C
LIST OF NOTABLE DOCUMENTS**

SECTION 1: SUBGRANT APPLICATION AND AWARD PROCESS

March 2017:

Draft Request for Applications

December 2017:

Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017)

Ohio CSP Grant Administration Comprehensive Plan

Ohio’s CSP Subgrant Review and Award Process

Grant Readers for Ohio's Charter School Program (CSP) Grant

CSP Grant Requirements Crosswalk

SECTION 2: CSP AND CHARTER SCHOOL QUALITY

March 2017:

Subgrantee Monitoring Protocol DRAFT

December 2017:

Request for Application-CSP

Sponsor Quality Practices Rubric

SECTION 3: ADMINISTRATIVE AND FISCAL RESPONSIBILITIES

March 2017:

Agreed-Upon Procedures

Request for Proposals (RFP) for Community School Program (CSP) Independent Monitor

Plan for the Ohio Grant Implementation Advisory Committee

Charter Schools Program Grant Fiscal Management Plan

ODE Monitoring Revisit 12/4-8

December 2017:

Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017)

Ohio CSP Grant Administration Comprehensive Plan

CSP Grant Requirements Crosswalk

Ohio High-Risk Condition Gantt Chart

ODE Corrective Action Plan

Kennedy Cottrell Richards engagement letter (May 31, 2017); Independent Accountant’s Report on Applying Agreed-Upon Procedures (August 14, 2017)

Governance Document for the Ohio CSP Grant Implementation Advisory Committee

Charter School Program Grant Monitoring Rubrics

Directory of Community Schools, Sponsors and Operators (webpage)

CSP Fiscal Management Plan

ODE CSP Grant (webpage)

SECTION 4: OVERSIGHT OF CHARTER SCHOOL AND MANAGEMENT ORGANIZATION RELATIONSHIPS

December 2017:

Charter Management Organization/Education Management Organization (CMO/EMO) Questionnaire

Grantee Comments

John R. Kasich, Governor
Paolo DeMaria, Superintendent of Public Instruction

June 6, 2018

Stefan Huh
Director, Charter Schools Program
U.S. Department of Education
400 Maryland Ave. S.W.
Washington, D.C. 20202

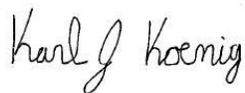
Dear Director Huh:

On March 13, 2018, the Ohio Department of Education received the draft Charter Schools Program (CSP) Monitoring Report prepared by WestEd for the U.S. Department of Education. The Ohio Department of Education (the Department) was afforded the opportunity to provide feedback on the draft report. Representatives from WestEd reviewed our recommendations/discussion and updated the monitoring report. On May 20, 2018, the Department was provided an updated version of the monitoring report. Overall, the Department is generally pleased with the report which shows our continued movement forward having addressed items identified during site visits and areas for continued growth.

Feedback from this report will be used as the Department continues implementation of CSP funds during the 2018-2019 school year.

Should you need additional information, please do not hesitate to contact me.

Sincerely,



Karl Koenig, Director
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Ohio Department of Education

Charter Schools Program

Monitoring Report

Draft Report

Prepared for the

U.S. Department of Education

Date: June 2018



WestEd 

Submitted by WestEd

June 2018

ED-OII-15-C-0051,
Option Period 2

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This document includes all indicators that were used for the 2016-2017 State Educational Agency (SEA) monitoring activities. These indicators were developed under the Elementary and Secondary Education Act (ESEA), as amended by No Child Left Behind Act (NCLB) (20 USC 7221-7221i). This version of the protocol has been updated based on the Nationwide Assessment of Charter and Education Management Organizations Final Audit Report, ED-OIG/A02M0012, September 2016.

For fiscal year 2017 and thereafter, ESEA has been amended by the Every Student Succeeds Act (ESSA), (20USC 7221-7221i). In fiscal year 2018, the indicators contained herein will be updated to reflect the ESSA language and in accordance with Charter Schools Program (CSP) priorities for monitoring of fiscal year 2017 and subsequent SE grantees.

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I. INTRODUCTION

Monitoring is the regular and systematic examination of a grantee's administration and implementation of a Federal education grant, contract, or cooperative agreement administered by the U.S. Department of Education (ED). Monitoring the use of Federal funds has long been an essential function of ED. ED monitors programs under the general administrative authority of the U.S. Department of Education Organization Act. Section 80.40(e) of Education Department General Administrative Regulations (EDGAR) also permits ED to make site visits as warranted by program needs.

ED policy requires every program office overseeing discretionary or formula grant programs to prepare a monitoring plan for each of its programs. The plans are designed to link established monitoring to achieving program goals and objectives; adhering to laws, regulations, and assurances governing the program; and conforming to the approved application and other relevant documents. Each principal office monitors (1) for results; (2) to ensure compliance with the law; and (3) to protect against waste, fraud, and abuse.

The purpose of the Charter Schools Program (CSP) Monitoring Plan is to assess the extent to which grantees are implementing their approved grant projects in compliance with Title V, Part B Public Charter Schools Program statutes, regulations, and guidance. The CSP monitoring objectives are threefold:

- Increase CSP fiscal and programmatic accountability at State and local levels
- Support and improve grantee capacity in carrying out the purpose of the CSP through the timely and efficient administration of Federal funds awarded under this program and other Federal education programs
- Assist grantees with the planning and implementation of high-quality charter schools

Thus, monitoring serves not only as a means for helping grantees achieve high-quality implementation of their CSP grant project, it also helps ED to be a better advisor and partner in that effort. CSP monitoring efforts are designed to focus on the results of grantees' efforts to implement critical requirements of the CSP using available resources and guidance. Information and data from grantee monitoring also assist to inform the program's performance indicators under the Government Performance Results Act.

The following report uses data collected as part of the December 2017 monitoring visit to document the status and progress ODE has made in implementing grant objectives. Findings in this report update those from the October 2017 monitoring report (based on data from the March 2017 site visit) and reflect ODE's compliance and performance under the CSP grant from the beginning of the current grant period to the time of the December 2017 site visit.

II. BACKGROUND INFORMATION ON GRANTEE

CHARTER CONTEXT, STRUCTURE, AND SIZE

BASIC CHARTER PROVISIONS

The Ohio General Assembly passed House Bill 215 in June 1997 establishing a pilot community school program in Lucas County. Community schools¹, which are charter schools in Ohio, can be sponsored by school districts, joint vocational districts, educational service centers, public universities, qualified nonprofits, and the Ohio Department of Education (ODE). Although conversion schools are allowed throughout the state, new start-ups are limited to challenged districts, including the eight largest urban districts. Community schools, whether start-ups or conversion schools, act as their own LEA.

Effective January 1, 2015, a new sponsor evaluation framework went into effect that rated sponsors annually on three components: the academic performance of students enrolled in schools under their sponsorship, adherence to quality practices, and compliance with applicable laws and rules. The Ohio Department of Education suspended the Sponsor Performance Review, also called the Authorizer Quality Performance Review (AQPR), in July 2015 and rescinded the ratings of the seven evaluations that had been completed at that point. Evaluation of the remaining 58 sponsors that were in process was suspended. ODE had learned that the initial ratings had omitted the academic performance of eSchools, as well as dropout prevention and recovery schools. The ratings also included schools that Ohio law excluded. As a result, an Independent Advisory Panel was appointed to make recommendations to improve the sponsor evaluation process and House Bill 2 (HB2) was passed which revised the sponsor evaluation system including the sponsor ratings. The sponsor evaluation process resumed in February 2016 following the effective date of HB2. New ratings were released in October 2016 for the 2014-2015 and 2015-2016 school years and in November 2017 for the 2016-2017 school year. See below for additional detail regarding HB2.

State Charter Law Summary	
Basic Components	Statute Summary
Charter Types	New start-ups and traditional public school conversions are allowed.
Authorizer Types (e.g., SEA, LEA, IHE, non-profit)	Multiple authorized public chartering agencies are allowed, including LEAs, IHEs, non-profit organizations, educational service centers, and the Ohio Department of Education.
LEA Status (e.g., own LEA or part of traditional LEA)	Ohio law allows charter schools to act as their own LEA.

¹ Charter schools are known as community schools in Ohio and authorizers are known as sponsors. The terms are used interchangeably throughout the report.

Charter Caps

State statute law allows conversion charter schools in all districts but limits start-up charter schools to “challenged” districts, including the eight largest urban school districts in the state. Ohio law allows five new eSchools per year and limits enrollment increases to no more than 25% per year above base enrollment for eSchools with fewer than 3,000 students and no more than 15% per year for eSchools with greater than 3,000 students.

Other

Charter schools may serve general education or dropout prevention and recovery programs and may provide instruction at site-based schools or eSchools, as virtual schools are called in Ohio.²

LAW/POLICY CHANGES SINCE GRANT APPLICATION

In October 2015, the Ohio legislature passed House Bill 2 (HB2), a charter reform law which significantly increased the transparency, accountability, and responsibility for sponsors, community schools, governing boards, and operators in Ohio. Among other things, the new law strengthened the SEA oversight of sponsors, encouraged quality authorizer practices, put limitations on low-performing community schools’ ability to change sponsors, increased independence and transparency of governing boards, and increased operator transparency. For a full review of HB2, see the Ohio Department of Education’s Community School Legislative History at <http://education.ohio.gov/getattachment/Topics/Community-Schools/Annual-Reports-on-Ohio-Community-Schools/Community-School-LegisHistory.pdf.aspx>.

Updated Law/Policy	Effective Date (Year or Pending)
HB2 required all sponsors, with the exception of two grandfathered sponsors, to enter into a contract with ODE to sponsor schools by July 1, 2017, established a sponsor-ODE contract renewal process, required sponsors to annually report the amount and type of expenditure made in providing oversight and technical assistance, and prohibited the sponsor of a community school from selling goods or services to that school for a profit.	February 1, 2016
HB2 clarified the procedures of the sponsor evaluation system, established a new rating of “Poor,” outlined incentives for “Exemplary” sponsors, and imposed sanctions for “Ineffective” and “Poor” sponsors.	February 1, 2016
HB2 prohibited school district employees from serving on the board of any community school sponsored by the district; required boards to employ an independent attorney for negotiations of the school’s contract with the sponsor or operator; required criminal background checks, annual disclosure statements, disclosure of board members on school websites, and annual trainings on public-records and open meeting laws; and reduced the maximum governing board member compensation to match compensation of district boards.	February 1, 2016
HB2 required new or renewed contracts between the governing board of a community school and an operator contain certain criteria, including a stipulation of which entity owns the facilities and	February 1, 2016

² At the time of both site visits, dropout prevention and recovery schools as well as eSchools were not eligible to apply for CSP subgrants.

property and provides that all personal property belongs to the school; the development and publishing of an annual performance report for operators; management companies that receive more than 20 percent of the gross annual revenue of a community school to provide a detailed accounting including the nature and costs of the goods and services it provides to the school.

The Office of Community Schools (OCS) is led by a Director who oversees the operations of the office, including the sponsor evaluation process. There is a separate office within the Department, the Office of School Sponsorship, that authorizes and directly sponsors 31 community schools. At the time of the site visit the OCS Director, who serves as the Project Director for CSP, reported directly to the Senior Executive Director of the Center for Student Support and Education Options who reports to the Deputy State Superintendent. Fully staffed, the Office of Community Schools includes 10 individuals: the Director; the Grants Manager, six Education Program Specialists; one Management Analyst; and one Administrative Assistant. In addition, two other staff members joined the OCS team to assist with development of CSP materials (e.g., the request for proposals, request for reviewers, communications planning) and implementation of the CSP grant, one working under the Senior Executive Director of the Center for Student Support and Education Options and one under the Senior Executive Director of the Center for Accountability and Continuous Improvement. At the time of both site visits, all ODE staff contributing to the CSP grant were funded in-kind through the State.

CHARTER SCHOOL SECTOR

As of January 2018, 340 charter schools were operating in the state. Community schools in Ohio are clustered around the state’s eight largest urban school districts (Akron, Canton, Cincinnati, Cleveland, Columbus, Dayton, Toledo, and Youngstown) and in Lorain County.

Charter School Sector Highlights			
Major Metropolitan Areas	FY17 Sponsors	FY17 Schools	Context Notes (i.e., sponsor ratings)
Akron (Summit County)	7	19	6 Effective sponsors, 1 Poor sponsor
Canton (Stark County)	5	8	5 Effective sponsors
Cincinnati (Hamilton County)	8	21	6 Effective sponsors, 2 Ineffective sponsors
Cleveland (Cuyahoga County)	11	82	9 Effective sponsors, 2 Ineffective sponsors
Columbus (Franklin County)	10	74	10 Effective sponsors
Dayton (Montgomery County)	11	30	8 Effective sponsors, 2 Ineffective sponsors, 1 Poor sponsor
Lorain (Lorain County)	4	9	4 Effective sponsors
Toledo (Lucas County)	9	36	8 Effective sponsors, 1 Ineffective sponsor
Youngstown (Mahoning County)	6	11	5 Effective sponsors, 1 Ineffective sponsor

Since 2000, 260 charter schools have closed in Ohio. Slightly more than half of the schools (136 schools) closed voluntarily. Another 30 percent were ordered to close by the authorizer. Twenty-four were closed as a result of Ohio’s automatic closure law and the rest were not renewed.

Charter School Closures		
Year	Number of Schools Closed	Reasons for Closure
2000	3	Financial viability; contractual non-compliance; other contractual issues
2001	7	Financial viability; academic viability; contractual non-compliance; academic non-compliance; other contractual issues; merged with another community school
2002	1	Financial viability; contractual non-compliance; other contractual issues
2003	1	Financial viability
2004	5	Financial viability; contractual non-compliance; other contractual issues; academic performance; other good cause
2005	7	Financial viability; contractual non-compliance; other contractual issues
2006	18	Financial viability; contractual non-compliance; other contractual issues; poor financial performance; no longer met founding need; merged with/converted to a traditional public school; non-renewed; other good cause
2007	8	Financial viability; contractual non-compliance; other contractual non-compliance; merged with another community school
2008	14	Financial viability; contractual non-compliance; other contractual issues; no longer met founding need; other contractual non-compliance; merged with/converted to a traditional public school
2009	20	Financial viability; academic viability; contractual non-compliance; other contractual issues; no longer met founding need; other contractual non-compliance; unable to find a new facility; closed by operation of law due to poor academic performance; contract expired
2010	25	Financial viability; academic performance; contractual non-compliance; no longer met founding need; closed by operation of law due to poor academic performance and financial viability
2011	10	Financial viability; contractual non-compliance; other contractual issues; no longer met founding need; closed by operation of law due to poor academic performance; sponsor unable to renew; school was not audited; unable to find a new sponsor; closed by sponsor
2012	16	Financial viability; contractual non-compliance; no longer met founding need; unable to find a new facility; closed by operation of law due to poor academic performance and financial viability
2013	19	Financial viability; contractual non-compliance; no longer met founding need; poor academic and financial performance; closed by operation of law due to poor academic performance; suspended contract, failed to remedy; non-renewed due to low enrollment; school converted to a STEM school; closed by governing authority-sponsor approved; failed to constitute a governing authority
2014	27	Financial viability; contractual non-compliance; no longer met founding need; closed by operation of law due to poor academic performance; sponsor non-renewed, unable to

2015	30	Financial viability; contractual non-compliance; academic non-compliance; no longer met founding need; unable to find a new sponsor; suspended contract, failed to remedy; merged into an ESC program; contract not renewed, unable to find a new sponsor
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2017	25	Financial viability; academic viability; poor rated sponsor; contract non-renewed; declining enrollment; governing authority decision to close; closed by sponsor; conversion to traditional public program; voluntary closure due to sponsor ceasing operation; voluntary closure due to board decision
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2018 (to date)	4	Financial viability; no longer met founding need
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CHARTER SCHOOL PROGRAM GRANT

GRANT HISTORY

Ohio has received five CSP grants to date: 1998, 2001, 2004, 2007, and 2015 for a total of \$224,335,926. This monitoring report is an examination of the grantee’s 2015 grant implementation and related high-risk conditions. A previous visit was conducted in March 2017 to monitor the implementation of the grantee’s 2015 grant and the related high-risk conditions. The implementation of the grantee’s 2007 grant was previously monitored in 2009.

Grant Award History			
Grant Award Number	Award Period	Award Amount	Number of Subgrants Funded
S282A980010	10/1/98-9/30/02	\$13,099,342	Unknown*
S282A010016	8/1/01-7/31/05	\$62,100,000	Unknown*
U282A040017	10/1/04-9/30/07	\$50,938,127	192
U282A070010	8/1/07-7/31/12	\$48,817,500	147
U282A150023**	8/1/15-7/31/20	\$49,380,957	68 (proposed)

* Subgrant funding information was not systematically collected prior to June 2007.
 **ODE was originally awarded \$71,058,319 to fund 127 subgrantees under Grant Award Number U282A150023; this award and the anticipated number of subgrantees was reduced in September 2017.

GRANT ADMINISTRATION ISSUES

Due to concerns about ODE’s ability to carry out grant objectives, ED put Ohio’s 2015 award on hold in September 2015 to conduct a supplemental review of ODE’s grant application. The following September, ED informed ODE that the supplemental review was complete and the SEA

could begin conducting grant activities, subject to High-Risk Specific Conditions and Specific Conditions in the GAN. The subsequent rollout of ODE’s CSP grant project was delayed due to the supplemental review as well as the implementation of ODE’s authorizer evaluation system.

Prior to the March 2017 site visit, ED expressed concern about the grantee’s ability to meet the high-risk specific conditions of the grant in a timely manner and in a way that would allow them to conduct a CSP subgrant competition on their desired timeline. Between March 2017 and the December 2017 visit, ED worked closely with ODE to develop a corrective action plan to address implementation issues and compliance with grant conditions. During the intervening months, ODE completed a large body of work, including addressing most of the corrective action plan drawn from the findings of the March 2017 site visit and the high-risk conditions. ED had only minor concerns about route payment documentation heading into the December 2017 visit.

ED may impose specific conditions to the grant award to address administrative and programmatic issues. If specific conditions are noted, they are included under Indicator 3.9.

PROMISING PRACTICES AND AREAS OF CONCERN FROM PREVIOUS MONITORING

A site visit was conducted in March 2017 to monitor implementation of ODE’s 2015 CSP grant. Findings from this visit were compiled in the October 2017 monitoring report, which identified several areas of concerns related to the implementation of the 2015 grant. Each of these issues is noted below. The complete summary table from the October 2017 monitoring report (based on the March 2017 site visit) can be found in Appendix B.

Indicator #	Areas of Concern (AC) from Previous Monitoring
1.1 Subgrant Application Descriptions and Assurances	AC: Draft RFA does not include all required descriptions and assurances.
1.3 Definition of Charter School	AC: Definition in draft RFA does not completely align with Federal definition (e.g., clauses on IDEA and elementary/secondary program missing). Oversight of lotteries is indirect, through sponsor evaluations.
1.4 Peer Review	AC: Draft peer review documents are incomplete and inconsistent in desired qualifications for reviewers and methods for notifying, selecting, and training reviewers. Plans for using peer reviews to select subgrantees are undeveloped and do not take into account provisions in grant application (e.g., CEDO involvement, Recovery District Reserve).
2.1 Quality Authorizing Practices	AC: Robust authorizer (sponsor) evaluation framework is in place. However, high-stakes reviews may not take place at least once every five years for some community schools and technical assistance to authorizers may be limited.
2.2 Flexibility and Autonomy	AC: Flexibility and autonomy are outlined in existing state statute, however, there are potential implementation issues regarding conversion charter schools.
2.3 Subgrantee Quality	AC: Subgrant application review materials are not fully developed. Draft documents provided are not internally consistent with subgrant application.

2.4 Plan to Support Educationally Disadvantaged Students	AC: There was not a specific plan for how the CSP grant would support student achievement for educationally disadvantaged students.
2.5 Subgrantee Monitoring	AC: Existing state infrastructure for monitoring is systemic and will provide a valuable mechanism for CSP subgrantee monitoring. However, there has been no development of CSP specific monitoring content.
2.7 Assessment of Performance Measure Data	AC: Draft performance measures have not been fully approved yet. Some performance measures may be challenging to measure (e.g., 2.4, 3.4).
3.1 State-Level Strategy and Vision	AC: Authorizer quality is a significant driver of the SEA's vision for growth and accountability. Recent staffing changes and turnover may inhibit immediate efforts to articulate vision and strategy.
3.2 Federal Programs and Funding	AC: ODE has not yet developed a dissemination and engagement plan to guide communication with key stakeholders.
3.4 Administration of CSP Funds	AC: Grants management division has strong fiscal systems in place; however, these systems are dependent on the program office effectively articulating allowable costs and ongoing collaboration between two divisions.
3.7 Transfer of Student Records	AC: SEA relies on authorizers to ensure that records are appropriately and effectively transferred. In the past, when issues have developed, the SEA has intervened when necessary.
3.9 Compliance with Grant Conditions	AC: Sufficient progress has not been made on several high-risk conditions including High-Risk Specific Condition #5 which impacts the timeline for implementing the RFA.

As noted above, over the course of 2017 ODE made substantial progress in strengthening its CSP grant and addressing the high-risk conditions and findings from the March 2017 site visit. By the time of the December 2017 site visit, ODE had addressed many of these areas of concern. This progress is summarized in the following section on indicator performance.

III. INDICATOR PERFORMANCE SUMMARY

The following table shows the rating and recommendations for each indicator on which the grantees were observed as a part of the December 2017 site visit and summarizes progress since the March 2017 site visit. A “+” indicates the rating has improved between the two visits, a “-” indicates the rating has declined, and a “=” indicates the rating has remained the same. The table also provides details about specific issues that affected any rating, promising practices, or other noteworthy highlights. The table is color-coded to provide a quick overview of the grantee’s associated risk in meeting the CSP grant requirements. The color-coding key is below the table.

Between the March and December 2017 site visits, ODE either maintained or improved upon the ratings for each of the indicators below. At the time of the March 2017 visit, seven indicators were rated “Does not meet”, five indicators were rated “Partially meets”, two were rated “Largely meets”, and seven were rated “Fully meets”. By the December 2017 visit, this shifted to zero indicators rated “Does not meet”, six rated “Partially meets”, one rated “Largely meets”, and fourteen rated “Fully meets”.

INDICATOR PERFORMANCE SUMMARY FROM DECEMBER 2017 SITE VISIT

Indicator	Rating	Recommendation	Progress from March 2017	Notes (implementation issues, promising practices, noteworthy highlights)
Indicator 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.	Partially meets the indicator	Requires Technical Assistance	+	RFA contains nearly all of the required descriptions and assurances; however, the request and justification of waivers is missing and a focused description of how CSP funds will be used in conjunction with other federal funds is lacking.
Indicator 1.2: ELIGIBLE APPLICANTS.	Fully meets the indicator	None	=	Subgrant application process, including the RFA and technical review, ensures the eligibility of applicants.
Indicator 1.3: DEFINITION OF CHARTER SCHOOL.	Fully meet the indicator	None	+	Definition in RFA aligns with Federal definition and no concerns were noted at subgrantee schools.
Indicator 1.4: PEER REVIEW.	Fully meets the indicator	None	+	State efforts to widely recruit and obtain a pool of qualified reviewers may be considered a best practice.
Indicator 1.5: PROGRAM PERIODS.	Fully meets the indicator	None	=	RFA conforms to Federal program periods. State grant system only allows annual grant periods.
Indicator 2.1: QUALITY AUTHORIZING PRACTICES.	Partially meets the indicator	Requires Technical Assistance	+	The sponsor evaluation process has improved authorizer quality. However, there are still issues that need to be addressed regarding charter contracts and authorizer accountability.

Indicator	Rating	Recommendation	Progress from March 2017	Notes (implementation issues, promising practices, noteworthy highlights)
Indicator 2.2: FLEXIBILITY AND AUTONOMY.	Fully meets the indicator	None	+	Previously identified issues with flexibility and accountability in conversion school contracts had been addressed, largely by 20 sponsors ceasing their sponsor responsibilities and ODE reviewing conversion school contracts against a checklist for compliance issues.
Indicator 2.3: SUBGRANTEE QUALITY.	Fully meets the indicator	None	+	Grant review materials and processes have been created, such as an internal review checklist and a scoring rubric.
Indicator 2.4: PLAN TO SUPPORT EDUCATIONALLY DISADVANTAGED STUDENTS.	Partially meets the indicator	Requires Technical Assistance	+	The RFA now includes Competitive Preference Points with an emphasis on serving disadvantaged students in challenging communities. More sophisticated subgrantee plans and monitoring plans are needed to increase the likelihood of increased academic performance with these student populations.
Indicator 2.5: SUBGRANTEE MONITORING.	Largely meets the indicator	Recommended Technical Assistance	+	The grantee has a detailed monitoring process and tool. However, no training plan is in place for monitors. Desk visits were in process at the time of the site visit; no on site monitoring had been conducted as of yet.
Indicator 2.6: DISSEMINATION OF INFORMATION AND BEST PRACTICES.	Fully meets the indicator	None	=	Community schools are considered an equal part of State policy for school improvement.
Indicator 2.7: ASSESSMENT OF PERFORMANCE MEASURE DATA.	Fully meets the indicator	None	+	Performance measures have been clarified and approved by ED.
Indicator 3.1: STATE-LEVEL STRATEGY AND VISION.	Fully meets the indicator	None	+	ODE has increased its capacity to execute the grant. A first subgrant competition has been held and subgrants made. Other processes to deliver on the state-level strategy and vision are in early phases or still emerging.
Indicator 3.2: FEDERAL PROGRAMS AND FUNDING.	Fully meets the indicator	None	+	Efforts to inform relevant individuals and organizations about federal funding, including CSP, are sufficient.
Indicator 3.3: ALLOCATION OF CSP FUNDS.	Fully meets the indicator	None	=	Administrative funds are only used to pay for an external monitor. All SEA staff time is provided in kind.

Indicator	Rating	Recommendation	Progress from March 2017	Notes (implementation issues, promising practices, noteworthy highlights)
Indicator 3.4: ADMINISTRATION OF CSP FUNDS.	Partially meets the indicator	Requires Technical Assistance	=	Although adequate systems to administer CSP funds at the SEA level are largely in place, issues were identified at the subgrantee level related to guidance for reimbursement source documentation, tagging of assets, and budget modification documentation.
Indicator 3.5: USE OF GRANT FUNDS.	Fully meets the indicator	None	=	SEA provides subgrantees with spending guidance and subgrantee purchases thus far are within guidance parameters.
Indicator 3.6: LEA DEDUCTIONS.	Fully meets the indicator	None	=	Charter schools receive subgrant funding directly from the SEA.
Indicator 3.7: TRANSFER OF STUDENT RECORDS.	Partially meets the indicator	Requires Technical Assistance	=	SEA relies on authorizers to ensure that records are appropriately and effectively transferred. In the past, when issues have developed, the SEA has intervened when necessary.
Indicator 3.8: RECORDKEEPING.	Fully meets the indicator	None	=	Efforts to maintain and retain records are sufficient.
Indicator 3.9: COMPLIANCE WITH GRANT CONDITIONS.	Partially meets the indicator	Requires Technical Assistance	+	ODE is complying with all high-risk specific grant conditions, though some corrective actions remain to be resolved. Development of a Comprehensive Plan and use of a grant advisory committee may be considered best practices.
Indicator 4.1: MITIGATING RISK OF CHARTER SCHOOL RELATIONSHIPS WITH MANAGEMENT ORGANIZATIONS	No Rating	Recommended Technical Assistance	N/A (new)	ODE has developed a monitoring protocol which does address some of the risks relationships with management organizations pose to CSP objectives. No monitoring has been performed to date, and it is not clear the process can mitigate risk for subgrantees in the short-term given the lack of authority ODE has over sponsors or operators.
Indicator 4.2: OVERSIGHT OF EDFACTS DATA COLLECTION FOR MANAGEMENT ORGANIZATIONS	No Rating	None	N/A (new)	ODE uses a combination of existing State data collection systems and individualized instruments to collect charter school data. ODE is working to systematize all charter school data collection to reduce burden.

Indicator Color Coding Key
Fully meets the indicator
Largely meets the indicator
Partially meets the indicator
Does not meet the indicator.

IV. FINDINGS

This section presents the site visit team's observations of the grantee's implementation and administration of the CSP grant for each indicator for both the March 2017 and December 2017 site visits. Each indicator is stated, followed by information from the grantee's approved grant application and the site visit team's observations and findings of grantee implementation. Detailed summaries of the site visit team's observations are provided for each indicator item throughout this report. Where appropriate, the report also identifies implementation issues, non-substantive changes, and promising practices. A double dash (--) separates content from the two site visits. Text above the double dash is from the October 2017 monitoring report (based on the March 2017 site visit); text below the double dash reflects updates based on the December 2017 site visit. The implementation checkboxes for indicators, however, reflect findings for the December 2017 site visit only.

1. SUBGRANT APPLICATION AND AWARD PROCESS

A major function of CSP grantees is to conduct application and award processes to distribute CSP funds to subgrantees in the State, including funds for new charter school planning and implementation as well as for the dissemination of successful charter school practices. A minimum of 95 percent of each State's CSP allocation is distributed to subgrantees through this process. This section focuses on the State's requirements of subgrant applicants and its processes for evaluating, selecting, and awarding subgrants. Specifically, this section addresses the State's performance in fulfilling its responsibilities to:

- Require subgrant applicants to submit an application with Federally required descriptions and assurances
- Determine that applicants are eligible to receive CSP subgrants
- Ensure that eligible applicants meet the Federal definition of a charter school
- Employ a peer review process to evaluate subgrant applications
- Ensure CSP subgrants adhere to allowable time periods

Indicator 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES. The State requires each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency that includes the descriptions and assurances required by Federal statute.

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.		
ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
(A) a description of the educational program to be implemented by the proposed charter school, including — (i) how the program will enable all students to meet challenging State student academic achievement standards; (ii) the grade levels or ages of children to be served; and (iii) the curriculum and instructional practices to be used;	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The first paragraph of section D (Research-Based Academic Program/Comprehensive Design Aligned with Standards) of the draft RFA asks for a description that refers to alignment to the Ohio’s Academic Content Standards, satisfying requirement (A)(i), and curriculum and instructional practices, satisfying requirement (A)(iii). Section A (Executive Summary) asks for a one-page summary introducing the community school and refers to the grade levels to be served, satisfying requirement (A)(ii). -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. ODE’s process for developing the content of its subgrant application is included in its Comprehensive Plan, which provides a guide for the overall implementation of the grant and details processes required throughout the lifecycle of the grant. As stated in the Comprehensive Plan, procedures for design of the RFA included reviewing the RFA used for the most recent application round as well as recent legislation, comments from

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
		<p>monitoring, advisory committee feedback, ED review, and other input for necessary changes. ODE also used a CSP Grant Requirements Crosswalk when developing its RFA and Comprehensive Plan to help ensure that all required elements were included.</p> <p>Ohio’s April 2017 Request for Applications requests description of aspects of the educational program to be implemented by the proposed charter school in the Cover Page, Executive Summary, and Section E. Section E, Educational Model (p. 42), asks applicants to “fully describe the academic program, curriculum, instructional practices and plans for establishing school culture.” It further specifies that “The curriculum should be research-based, aligned to Ohio’s standards and tailored to meet the needs of its anticipated student population.” The grade levels of the children to be served are to be entered on the Cover Page and incorporated in Section A, Executive Summary (p. 38). Section A also asks the applicant to describe how the school will prepare students for academic success and to introduce the educational philosophy and approach. The review criteria in the Subgrant Application Rubric refer to the same aspects of the school’s educational program description.</p>
<p>(B) a description of how the charter school will be managed;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Section G (Board Governance and Management Accountability) of the draft RFA asks for “detailed information describing the school’s strategies for managing the community school...”</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
<p>(C) a description of — (i) the objectives of the charter school, and (ii) the methods by which the charter school will determine its progress toward achieving those objectives;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Section I (p. 46) of the April 2017 RFA is titled Governance and Management Plan. It asks applicants to address the composition and selection process for the governing board, the preparation of board members and policies, and the process the school will use to develop policies and procedures in accordance with State and Federal laws. The board’s role is also referenced in Section J: Business Capacity and Continued Operation (p. 47), where the directions state, “The school’s plan for organization, management and financial viability details board oversight.” In addition, Section H, School Personnel and External Support (p. 45), seeks information on the school’s organizational structure, key staff positions, founders, and network of support. Further, Appendix 12 (pp. 66-67) of the RFA is a CMO/EMO Questionnaire that collects information which ODE uses to ensure subgrant recipients who contract with a CMO/EMO are independent of that management organization.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Section B.6: Appendix H: Performance Management Plan of the draft RFA asks for the school’s Goals/Objectives and Current Performance Management System, including the data, methods, analyses, and other details.</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
		<p>-- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Section F (p. 43) of the April 2017 RFA focuses on Schools Goals. It directs the applicant to “describe the academic and non-academic goals it will use to measure its success, as well as the methods it will use to assess progress toward these goals throughout the school year.” In addition, Appendix 9: Performance Management Plan (pp. 62-63), calls for applicants to provide a list of goals/objectives as well as the associated action/activity that will be used to assess progress under the grant. More detailed information on each of the grant goals, activities, and performance measures is requested in Appendix 11 (p. 65).</p>
<p>(D) a description of the administrative relationship between the charter school and the authorized public chartering agency;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
		<p>March 2017 site visit: Section G (Board Governance and Management Accountability) of the draft RFA asks for “detailed information describing...the relationship between the governing board and (1) the sponsor...”. The draft RFA also requires the applicant to submit a copy of the preliminary agreement or charter contract between the school and the sponsor.</p>
		<p>-- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Section A: Executive Summary (p.38) of the April 2017 RFA directs applicants to include a</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
<p>(E) a description of how parents and other members of the community will be involved in the planning, program design, and implementation of the charter school;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>description of “the administrative relationship between the community school and its sponsor.” Applicants are also required to submit a copy of the Preliminary Agreement or Executed Contract with the sponsor as Application Appendix 4.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Section H (Parent/Community Involvement and Marketing) of the draft RFA directs the applicant to “[p]rovide detailed information on the level of support that the community school has from prospective parents and community members and organizations, and how the school will ensure ongoing involvement.” It does not specifically mention involvement in the planning, program design, and implementation phases of the charter school. -- December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. Section G: Outreach and Engagement (44) of the April 2017 RFA directs applicants to “include plans for engaging families and community members in the school’s planning, development and continued operations.” In addition, Assurance 8 of the Statement of Assurances (p. 32) that the applicant must sign stipulates “That the SUBGRANTEE will provide reasonable opportunities for participation by teachers, parents, and other interested agencies, organizations and individuals in the planning for and operation of each program, as may be necessary according to statute.”</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
(F) 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);	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: Section I (Business Capacity and Continued Operation) of the draft RFA does not mention the school’s authorized public chartering agency. ODE staff acknowledged in the onsite interview the need to add the authorizer’s role in continued operation of the school to this section. -- December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. In the April 2017 RFA, a Statement of Sponsor Assurances (p. 36) completed and signed by the sponsor is required to be submitted as part of the subgrant application. On this Statement, the sponsor is directed 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.”
(G) a request and justification for waivers of any Federal statutory or regulatory provisions that the eligible applicant believes are necessary for the successful operation of the charter school, and a description of any State or local rules,	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
<p>generally applicable to public schools, that will be waived for, or otherwise not apply to the school;</p>		<p>March 2017 site visit: The draft RFA does not contain any mention of or place for applicants to provide a request and justification for waivers. -- December 2017 site visit: A request and justification of waivers was missing during the December 2017 site visit. The April 2017 RFA does not contain any mention of or place for applicants to provide a request and justification for waivers. However, the CSP Grant Requirements Crosswalk submitted by ODE as evidence of the process of developing the RFA and Comprehensive Plan shows that this subgrant application requirement was considered by ODE but excluded from the RFA because the State did not intend to allow subgrantees to request a waiver. During the monitoring interviews, ODE staff indicated that they would revise the RFA in the future to include a place for applicants to request and justify waivers.</p>
<p>(H) a description of how the subgrant funds or grant funds, as appropriate, will be used, including a description of how such funds will be used in conjunction with other Federal programs administered by the Secretary;</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
		<p>March 2017 site visit: While the draft RFA asks applicants to provide information on how the subgrant funds will be used, it does not in any place ask applicants to address how such funds will be used in conjunction with other Federal programs administered by the Secretary. --</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
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December 2017 site visit:

The subgrant RFA required a clear statement of how subgrant funds would be used but there was not an explicit requirement to describe how those funds would be used in conjunction with other Federal funds. Section B: Subgrant Project Goals, Budget, Budget Narrative and Evaluation Methods (p. 39) of the RFA anticipates that subgrant applications will fully describe the intended use of subgrant funds and, further, that the budget narrative will also include a description of the supplementary funding needed for each project goal. In addition, Section B states as a review criterion that “Each subgrant project goal aligns with the school’s mission, vision, educational program and other federal grant programs.” However, the RFA does not require itemization of the Federal programs or funding amounts that will be used in conjunction with the CSP funds. Only one of the three successful subgrant applications indicated the amount of grant and non-grant funds that would be used within each category of their proposed budget, but the sources of the non-grant funds were not specified. The other two applications did not address other funding beyond the grant funds that would be used to accomplish the subgrant project goals.

One of the review criteria in Section J: Business Capacity and Continued Operation (p. 47) also addresses the use of Federal program funds: “The school explains how other federal, state, local, or private funds will be used to assist the school in institutionalizing effective practices.” However, the use of Federal funds in conjunction with the subgrant funds was not specified in Section J of any of the three funded subgrant applications.

The RFA also requires applicants to submit a copy of the community school’s annual and long-term budgets, and last audited financial statement, as Appendix 3 to the application. A review of the Appendix 3 documents for the awarded subgrantees revealed variation in the specificity with which revenue sources were labeled as Federal programs.

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
<p>(I) a description of how students in the community will be — (i) informed about the charter school, and (ii) given an equal opportunity to attend the charter school;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Thus, while there is a clear focus in the RFA and applications on how subgrant funds would be used, how these funds would be used in conjunction with other Federal funds is given little if any attention. It would be difficult for ODE to ascertain from the information submitted in the application how the CSP subgrant funds would be used in conjunction with other Federal programs administered by the Secretary.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Section H (Parent/Community Involvement and Marketing) of the draft RFA asks the applicant to provide an executive summary of the school’s Marketing Plan and to describe the full Marketing plan in Appendix G, and a selection criterion provided in the draft RFA is that the executive summary “describes how students and parents in the community will be informed about the charter school...”. However, the draft RFA does not contain an explicit place or instructions for including this appendix.</p> <p>The requirement for a description of how students will be given an equal opportunity to attend the charter school is not explicit in the draft RFA. The draft RFA includes a section on Lottery and Enrollment Requirements, which states that “[t]he applying community school has an enrollment policy that includes admitting students on the basis of a lottery, if more students apply for admission than can be accommodated.” Applicants are required to submit the school’s enrollment policy and procedures, including a description of the</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
		<p>lottery, as Appendix A of the application package; however, the draft RFA does not contain an explicit place or instructions for including this appendix.</p> <p>--</p> <p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. Section G: Outreach and Engagement (p.44) of the April 2017 RFA asks applicants to include plans for engaging families and community members in the school; one review criterion for this section is “The school describes how students and parents in the community will be informed about the community school...”</p> <p>Page 5 of the April 2017 RFA cites U.S. Code, stating “community schools receiving CSP funds must provide all students in the community with an equal opportunity to attend the charter school.” Assurance 57 (p. 35 of the RFA) of the Statement of Assurances that applicants must sign also contains this clause. Applicants must include their school enrollment policy, including lottery protocol, as Appendix 1 to the application, thus describing how students in the community will be given an equal opportunity to attend the charter school.</p> <p>Instructions in the RFA for Appendix 8: Marketing Plan (p. 61) contain related expectations for components of the school’s marketing plan:</p> <ul style="list-style-type: none"> • “A clear description of how the school will inform the community about its enrollment process, procedures and deadlines;” and • “A description of how the marketing plan is multi-modal and increases access to the community school for all prospective students.”

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
<p>(J) an assurance that the eligible applicant will annually provide the Secretary and the State educational agency such information as may be required to determine if the charter school is making satisfactory progress toward achieving the objectives described in subparagraph (C)(i);</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Assurance 43 in the draft RFA has similar language to the required assurance except that it refers to information on the charter school making satisfactory progress toward achieving the stated project objectives, rather than toward the objectives of the charter school, as referenced by subparagraph (C)(i). -- December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. Assurance 46 (p. 35 of the RFA) of the Program-Specific Assurances that applicants must sign as part of the application states, "That the SUBGRANTEE will annually provide the U.S. Secretary of Education and ODE such information as may be required to determine if the community school is making satisfactory progress toward achieving the objectives described in subparagraph (C)(i)."</p>
<p>(K) an assurance that the eligible applicant will cooperate with the Secretary and the State educational agency in evaluating the program assisted under this subpart;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
<p>(L) a description of how a charter school that is considered a local educational agency under State law, or a local educational agency in which a charter school is located, will comply with Sections 613(a)(5) and 613(e)(1)(B) of the Individuals with Disabilities Education Act;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>March 2017 site visit: Assurance 18 in the draft RFA states, "The SUBGRANTEE shall cooperate in any evaluation by the Department and ED." -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Assurance 47 (p. 35 of the RFA) of the Program-Specific Assurances that applicants must sign as part of the application states: "That the SUBGRANTEE will cooperate with the U.S. Secretary of Education and ODE in evaluating the program assisted under this subpart." Assurance 18 (p. 33) also states: "The SUBGRANTEE shall cooperate in any evaluation by the DEPARTMENT." <input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The draft RFA does not in any place ask applicants to describe how the charter school or relevant local educational agency will comply with Sections 613(a)(5) and 613(e)(1)(B) of the Individuals with Disabilities Education Act. --</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
		<p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. Section D: Educationally Disadvantaged Students (p. 41) of the April 2017 RFA addresses what information the applicant proposal should include about recruiting, enrolling, and serving educationally disadvantaged students. One review criterion includes: "...a description of how the school will comply with sections 613(a)(5) and 613(e)(1)(B) of the Individuals with Disabilities Education Act." Community schools in Ohio are considered local educational agencies under State law.</p>
<p>(M) if the eligible applicant desires to use subgrant funds for dissemination activities under Section 5202(c)(2)(C), a description of those activities and how those activities will involve charter schools and other public schools, local educational agencies, developers, and potential developers; and</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
<p>(N) such other information and assurances as the Secretary and the State educational agency may require.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The draft RFA includes many other information requirements and assurances, and the Reporting section of the draft RFA states that "as part of the Federal CSP grant...subgrantees (and/or Sponsors) will be required to...submit interim reports,</p>

Table 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.

<p>ESEA Section 5203. Applications. (b) Each application submitted pursuant to subsection (a) shall (3) contain assurances that the State educational agency will require each eligible applicant desiring to receive a subgrant to submit an application to the State educational agency containing</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
		<p>reimbursement requests, and any other required information in a timely and efficient manner...".</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. The April 2017 RFA includes many other information requirements and assurances, including Assurance 42 (p. 34) addressing "Any additional assurances listed within the document library for a specific application as required by the ODE program office administering the program" and other assurances relating to Federal laws as well as program-specific assurances.</p>

Sources: *March 2017 Request for Applications, Ohio Community Schools Program, Community School Application for a Planning/Implementation Subgrant (draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft, draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft for tech editing 02 24 2017)*

December 2017 Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017); CSP Grant Requirements Crosswalk, Ohio CSP Grant Administration Comprehensive Plan

Indicator 1.2: ELIGIBLE APPLICANTS. The State ensures each applicant desiring to receive a subgrant meets the term “eligible applicant.”

Table 1.2: ELIGIBLE APPLICANTS.		
The State ensures each applicant desiring to receive a planning or implementation subgrant meets the term “eligible applicant,” including:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). <p>March 2017 site visit: As described in the draft RFA, “...eligibility to apply for the 2018 CSP subgrant includes: A community school developer/founder applying for a planning grant must hold a preliminary agreement describing the intention of an eligible sponsor and the developer to pursue...the execution of a community school contract...and [t]he applying community school must be sponsored by an eligible sponsor and...opened...or hold a community school contract...”. A copy of the preliminary agreement or executed contract is required to be included as Appendix E to the application. OCS staff stated that they will check that the document is submitted.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. ODE ensure that the school’s developer has applied to an authorized public charter authority to operate a charter school by stating relevant requirements on p. 6 of the April 2017 RFA and requiring that either a preliminary agreement (for planning subgrantees) or a community school contract (for implementation subgrantees) be submitted as part of the application.</p> <p>For planning applicants, “A community school developer/founder applying for a planning grant must hold a preliminary agreement describing the intention of an eligible sponsor and the developer to pursue, in good faith, the execution of a community school contract.” Further, the preliminary agreement must be “adopted prior to March 15, 2017, with an intention to open for the first time in the fall of 2018 if applying for a planning grant.”</p>

Table 1.2: ELIGIBLE APPLICANTS.

The State ensures each applicant desiring to receive a planning or implementation subgrant meets the term “eligible applicant,” including:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Ensure the school’s developer has provided adequate and timely notice to that authority under Section 5203(d)(3).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Community school applicants for implementation subgrants “must be sponsored by an eligible sponsor” and be entering or in its first or second year of operation.</p> <p>A copy of the preliminary agreement or executed contract (i.e., the charter) is required of all applicants to be submitted as Appendix 3 to the application. These documents are checked as part of the technical review.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The draft RFA states, “The applicant’s...sponsor must approve the school’s intention to apply for the CSP grant...”. This requirement ensures adequate and timely notice but also goes beyond it. -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. ODE ensure the school’s developer has provided adequate and timely notice to an authorized public chartering authority under Section 5203(d)(3) by requiring a Statement of Sponsor Assurances (p. 36 in the April 2017 RFA) be submitted as part of the subgrantee application. The sponsor’s signature on this document indicates not only notice but acknowledgment of several confirmations and assurances of the sponsor’s role with regard to the applying community school.</p>

Table 1.2: ELIGIBLE APPLICANTS.

The State ensures each applicant desiring to receive a planning or implementation subgrant meets the term “eligible applicant,” including:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Verify non-profit status of the charter holder.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: OCS has a checklist for reviewing the community school contracts that are submitted with the subgrant application. In the checklist, one required element is: “Each contract entered into between a sponsor and the governing authority of a community school shall specify the following: That the school shall be established as...(b) A public benefit corporation established under Chapter 1702 of the Revised Code, if established after April 8, 2003. The checklist also prompts the reviewer to ascertain if a copy of the Secretary of State certificate is provided. -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. For ODE’s 2017 subgrantee application process, verification of the non-profit status of the charter holder was accomplished by using the Comprehensive Continuous Improvement Plan (CCIP), the Department’s e-grant application system, for CSP submissions. To access CCIP, applicants must have an IRN (unique school identifying number) and to obtain an IRN a community school must provide documentation, including tax and funding information, relevant to its organizational status. Under Chapter 1702 of Ohio’s Revised Code a community school must be established as a nonprofit corporation (if established prior to April 8, 2003) or a public benefit corporation (if established after April 8, 2003). Page 19 of the April 2017 RFA contains technical assistance on how to obtain the access needed to enter CCIP if a user does not have an existing IRN or does not know if their organization has an IRN.

Table 1.2: ELIGIBLE APPLICANTS.

The State ensures each applicant desiring to receive a planning or implementation subgrant meets the term “eligible applicant,” including:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Award not more than one grant to a school.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The draft RFA states, “Community schools who have received CSP grants or subgrants in previous years are not eligible to apply.” (The draft also contains the comment that “This will be revised if a waiver for significant expansion is submitted to and approved by ED.”). Schools apply with an IRN, or Internal Retrieval Number, and the checklist for reviewing the community school contracts that are submitted with the subgrant application also prompts the reviewer to look for the community school’s IRN. The IRN is a unique identifier attached to each school and is used as the vendor number for the SEA to make payments. ODE staff stated that the IRN would be checked to ensure the applicant had not previously received a subgrant. However, it is not clear that OCS has an established process in place for conducting this check. -- December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. The April 2017 RFA makes clear that schools may not receive CSP funding under more than one grant. Page 6 of the April 2017 RFA states, “Community schools that received CSP grants directly from the U.S. Department of Education or Ohio subgrants prior to 2015” are ineligible for subgrants. (2015 is the start date of Ohio’s current SEA grant, so schools could not receive non-SEA grants after that time.) The prohibition on previous grants is also addressed in Assurance 56 of the Program-Specific Assurances (p. 35), which reads: “That the SUBGRANTEE assures it has NOT received CSP grant funds for the same or substantially similar purpose directly from the U.S. Department of Education or the Ohio Department of Education.” The Technical Review Checklist (p. 68) also includes the item that “Applicant has never received a CSP grant from the U.S. Dept. of Education or the Ohio Department of

Table 1.2: ELIGIBLE APPLICANTS.

The State ensures each applicant desiring to receive a planning or implementation subgrant meets the term “eligible applicant,” including:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>For dissemination applicants: ensure the charter school has been in operation for at least 3 consecutive years and has demonstrated overall success, including—</p> <ul style="list-style-type: none"> (i) substantial progress in improving student academic achievement; (ii) high levels of parent satisfaction; and (iii) the management and leadership necessary to overcome initial start-up problems and establish a thriving, financially viable charter school. 	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<p>Education.” ODE requested from ED a list of all Ohio schools that had previously received CSP funds (including through CMO grants) in order to conduct this check. Further, the subgrantees visited were all aware of the prohibition on receiving more than one start-up or implementation grant.</p> <input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).

Sources: *March 2017* Request for Applications; Ohio Community Schools Program; Community School Application for a Planning/Implementation Subgrant (draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft, draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft for tech editing 02 24 2017); Community School Contract Review Checklist 2016-2017, revised 03/08/2016

December 2017 Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017); Ohio Revised Code Section 3314.03(A)(1); Ohio Department of Education, Establishing A New Community School in OEDS; Ohio – CSP Awards Database 6.7.2017

Indicator 1.3: DEFINITION OF CHARTER SCHOOL. The State ensures each eligible applicant meets the term “charter school.”

Table 1.3: DEFINITION OF CHARTER SCHOOL.		
ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term ‘charter school’ means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
(A) in accordance with a specific State statute authorizing the granting of charters to schools, is exempt from significant State or local rules that inhibit the flexible operation and management of public schools, but not from any rules relating to the other requirements of this paragraph;	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The draft RFA states, “To be eligible for a Planning/Implementation subgrant, applicants must first conform to the Federal definition of a community school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)].” In this instance, it appears that the SEA has replaced “charter” with “community” in the draft RFA, which does not strictly adhere to the Federal definition. Assurances 39 and 41 also address compliance with the Federal definition of a charter school. Assurance 41 includes reference to the Ohio charter school statute, specifically, “The SUBGRANTEE operates in accordance with Ohio Revised Code, Chapter 3314, as applicable.” -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, “To be eligible for a planning or implementation subgrant, applicants must first conform to the federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]” and lists verbatim the definitions a – l contained in Federal law. ODE checks that applicants meet the Federal definition in the technical review of applications. No concerns were noted either at the State or school level about eligible applicants being exempt from significant State or local rules that inhibit the flexible operation and management of public schools in accordance with a specific State statute authorizing the

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>(B) is created by a developer as a public school, or is adapted by a developer from an existing public school, and is operated under public supervision and direction;</p>	<input type="checkbox"/> Yes	<p>granting of charters to schools. All subgrantees exhibited flexible operation and management of their schools under Ohio charter school law.</p>
	<input checked="" type="checkbox"/> No	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(a) Is created by a developer as a public school, or is adapted by a developer from an existing public school, and is operated under public supervision and direction." Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – l contained in Federal law. ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants being created by a developer as a public school, or adapted by a developer from an existing public school, and operated under public supervision and direction. All subgrantees operated as public schools and were governed by a board of directors.</p>
<p>(C) operates in pursuit of a specific set of educational objectives determined by the school's developer and agreed to by the authorized public chartering agency;</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: (b) Operates in pursuit of a specific set of educational objectives determined by the school's developer and agreed to by the authorized public chartering agency. The SEA replaced "charter" with "community" in the draft RFA. Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – l contained in Federal law. ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants operating in pursuit of a specific set of educational objectives determined by the school's developer and agreed to by the authorized public chartering agency. All subgrantees held charters with educational objectives agreed to by the school and its sponsor.</p>
(D) provides a program of elementary or secondary education, or both;	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). <p>March 2017 site visit: Assurance 41 of the draft RFA, which most closely mirrors the definition of a charter school contained in Section 5210(1) of the ESEA, fails to include the elementary and secondary</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>education clause. Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision.</p> <p>--</p> <p>December 2017 site visit:</p> <p>This element had been addressed and was being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – l contained in Federal law. ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants providing a program of elementary or secondary education, or both. Page 5 of the April 2017 RFA states that "the applicant must plan or implement...a general education school." The RFA goes on to state, "...for the purposes of this subgrant, the Department defines general education schools as community schools serving any grades from kindergarten through 12..." The subgrantees were operating schools with grade configurations encompassing K to 8.</p>
<p>(E) is nonsectarian in its programs, admissions policies, employment practices, and all other operations, and is not affiliated with a sectarian school or religious institution;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>Assurance 41 of the draft RFA includes the clause: "(c) Is nonsectarian in its programs, admissions policies, employment practices, and all other operations, and is not affiliated with a sectarian school or religious institution." Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision.</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – l contained in Federal law. ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants being nonsectarian and not affiliated with a sectarian school or religious institution. The one subgrantee who rented from a church had removed religious symbols and artifacts on the leased portion of the grounds.</p>
(F) does not charge tuition;	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). <p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(d) Does not charge tuition." Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>(G) complies with: the Age Discrimination Act of 1975, Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and Part B of the Individuals with Disabilities Education Act;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>lists verbatim the definitions a – l contained in Federal law. ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants charging tuition. The subgrantee schools charged minimal fees for special activities or other items if they did not provide them free of charge to students.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: “(e) Is in compliance with and will continue to comply with the Age Discrimination Act of 1975, Title VI of the Civil Rights Act of 1964, Title IX of the Education Amendments of 1972, Section 504 of the Rehabilitation Act of 1973, and Part B of the Individuals with Disabilities Education Act.” Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools’ compliance with this provision.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, “To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]” and lists verbatim the definitions a – l contained in Federal law. ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants complying with applicable Federal laws. For example, each subgrantee school provided a</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>(H) is a school to which parents choose to send their children, and that admits students on the basis of a lottery, if more students apply for admission than can be accommodated;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>program of special education for eligible students and ODE noted that it has specific procedures for handling any complaints about special education.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: “(f) Is a school to which parents choose to send their children, and that admits students on the basis of an annual lottery, if more students apply for admission than can be accommodated.” Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools’ compliance with this provision. -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, “To be eligible for a planning or implementation subgrant, applicants must first conform to the federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]” and lists verbatim the definitions a – l contained in Federal law. ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants being schools to which parents choose to send their children, and that admit students on the basis of a lottery, if more students apply for admission than can be accommodated. The RFA contains a section on lottery requirements and requires the school’s lottery policy to be submitted as Appendix 1 to the application. None of the subgrantees had more students apply for admission than could be accommodated, so none had yet employed a lottery.</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>(I) agrees to comply with the same Federal and State audit requirements as do other elementary schools and secondary schools in the State, unless such requirements are specifically waived for the purpose of this program;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(g) Agrees to comply with the same Federal and state audit requirements as do other elementary schools and secondary schools in the State." Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision. -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – I contained in Federal law. ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants complying with audit requirements. Each community school's last audited financial statement is required to submitted with Appendix 3 of the application.</p>
<p>(J) meets all applicable Federal, State, and local health and safety requirements;</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL.

<p>ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
		<p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(h) Meets all applicable Federal, state, and local health and safety requirements." Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision. -- December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – l contained in Federal law. ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants meeting applicable health and safety requirements. The April 2017 RFA contains Assurance 23 (p. 33) stating "That the SUBGRANTEE will comply with any applicable federal, state, and local health or safety requirements that apply to the facilities used for a project (34 CFR 76.683)." In addition, community school sponsors must submit to ODE a pre-opening checklist for each school every year that includes compliance with health and safety requirements. One subgrantee school that was renovating a building opened later than expected because it needed to wait to be cleared for the required occupancy approvals.</p>
<p>(K) operates in accordance with State law; and</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL.

ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>(L) has a written performance contract with the authorized public chartering agency in the State that includes a description of how student performance will be measured in charter schools pursuant to State assessments that are required of other schools and pursuant to any other assessments mutually agreeable to the authorized public chartering agency and the charter school.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(i) Operates in accordance with state law." Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools' compliance with this provision.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, "To be eligible for a planning or implementation subgrant, applicants must first conform to the federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]" and lists verbatim the definitions a – l contained in Federal law. ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants operating in accordance with State law. The April 2017 RFA contains Assurance 52 (p. 35) stating "That the subgrantee will comply with all applicable laws and rules." Further, Assurance 5 in the Statement of Sponsor Assurances (p. 36) reinforces the community school sponsor's responsibility to monitor the community school's compliance with all applicable laws and to take the necessary steps to intervene to correct problems.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Assurance 41 of the draft RFA includes the clause: "(j) Has a written performance contract with an authorized sponsor, rated exemplary or effective overall in the latest sponsor evaluation, that includes a description of how student performance will be measured in community schools pursuant to state assessments that are required of other public schools</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL.

<p>ESEA Section 5210. DEFINITIONS. (1) CHARTER SCHOOL The term 'charter school' means a public school that</p>	<p>Implementation Issue?</p>	<p>Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.</p>
		<p>and pursuant to any other assessments mutually agreeable to by the sponsor and the community school.” Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools’ compliance with this provision.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 site visit. Page 4 of the April 2017 RFA states, “To be eligible for a planning or implementation subgrant, applicants must first conform to the Federal definition of a public charter school in the Elementary and Secondary Education Act (ESEA) [P.L. 107-110, Section 5210(1)]” and lists verbatim the definitions a – l contained in Federal law. ODE checks that applicants meet the Federal definition in the technical review of applications.</p> <p>No concerns were noted either at the State or school level about eligible applicants having a written performance contract with an authorized charter school sponsor that includes a description of how student performance will be measured pursuant to prescribed assessments. As noted earlier, each applicant must provide a copy either of a preliminary agreement or executed contract with its sponsor as an appendix to the application. Under Ohio Revised Statutes 3314.03 (A)(3), every community school contract must include: “The academic goals to be achieved and the method of measurement that will be used to determine progress toward those goals, which shall include the statewide achievement assessments.”</p>

Sources: *March 2017 Request for Applications, Ohio Community Schools Program, Community School Application for a Planning/Implementation Subgrant (draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft, draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft for tech editing 02 24 2017)*

December 2017 Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017); Ohio Revised Code Section 3314.03 (A)(3)

Table 1.3: DEFINITION OF CHARTER SCHOOL Lottery and Enrollment Processes. Detailed Information.	
Approach to ensuring that lotteries and enrollment practices at all funded schools meet Federal guidelines.	Provide detailed narrative about the grantee’s current approach.
How lotteries for admission to charter schools will be conducted in the State, including student enrollment preferences or exemptions.	<p>March 2017 site visit:</p> <p>Provisions for charter school lotteries and student enrollment preferences and exemptions in the state are contained in ORC 3314.06. Division (H) of that statute states, “That, except as otherwise provided under division (B) of this section or section 3314.061 of the Revised Code, if the number of applicants exceeds the capacity restrictions of division (F) of this section, students shall be admitted by lot from all those submitting applications, except preference shall be given to students attending the school the previous year and to students who reside in the district in which the school is located. Preference may be given to siblings of students attending the school the previous year.” Division (B) (1) states, “That admission to the school may be limited to students who have attained a specific grade level or are within a specific age group; to students that meet a definition of "at-risk," as defined in the contract; to residents of a specific geographic area within the district, as defined in the contract; or to separate groups of autistic students and nondisabled students, as authorized in section 3314.061 of the Revised Code and as defined in the contract.” The statute also allows single-gender schools. Because no subgrants have been awarded to date, the site visit team was unable to assess subgrantee schools’ implementation of enrollment practices and lotteries.</p> <p>--</p> <p>December 2017 site visit:</p> <p>Ohio’s April 2017 RFA (pp. 8-9) contains an explanation of lottery and enrollment requirements for subgrant applicants, addressing Exemptions, Enrollment Policy and Weighted Lotteries. This section of the RFA cites and is in accordance with 20 USC 7221i(1)(H) and Section E of the federal CSP Nonregulatory Guidance. Among other provisions, it makes clear that the use of weighted lotteries and designated feeder patterns are not allowable for CSP subgrantees (the latter stipulation is repeated on p. 6 in the Ineligible Applicants section).</p> <p>Subgrant applicants are required to submit the community school’s enrollment policy, including lottery protocol, as Appendix 1 to the application. In the technical review, ODE staff check that the applicant does not have designated feeder patterns or weights associated with its lottery.</p> <p>The lottery and enrollment policies for all three of the subgrantees appeared to be in compliance with State law and Federal requirements. The team was unable to assess subgrantee schools’ lottery implementation because none of the schools were oversubscribed and needed to use a lottery.</p>

Table 1.3: DEFINITION OF CHARTER SCHOOL Lottery and Enrollment Processes. Detailed Information.

Approach to ensuring that lotteries and enrollment practices at all funded schools meet Federal guidelines.	Provide detailed narrative about the grantee’s current approach.
Use of weighted lottery (if applicable).	<p>March 2017 site visit: At the time of the site visit, ODE had decided not to seek approval from ED for the use of weighted lotteries by charter school subgrantees under the CSP grant award (per GAN Specific Condition 5). ODE staff planned to send an email to their program officer stating this.</p> <p>--</p> <p>December 2017 site visit: Ohio does not allow subgrantees to use weighted lotteries. Page 9 of the April 2017 RFA states, “The use of weighted lotteries is not permitted by community schools receiving CSP funds.”</p>
Mechanisms that exist for the SEA or authorizers to review, monitor, or approve lotteries or student enrollment preferences or exemptions from the lottery.	<p>March 2017 site visit: ODE staff stated that ODE’s role is to interact with the authorizer around their review of school lotteries. Sponsors are required to review charter schools’ policies and procedures to ensure they are in compliance. The SEA evaluates the sponsor on all laws and rules; oversight of the lottery is one of 300 items.</p> <p>--</p> <p>December 2017 site visit: Authorizer oversight of lotteries and the SEA evaluation of sponsors are the main mechanisms for reviewing, monitoring, and approving charter school lotteries and student enrollment preferences or lottery exemptions. ODE staff stated that lottery requirements are included in training for sponsors. In addition, the SEA collected and reviewed lottery policies as part of the Spring 2017 CSP subgrant application process.</p>

Sources: *March 2017* Ohio CSP Grant Application; Grant Award Notification U282A150023 – 16 (Sept. 14, 2016); Ohio Revised Code 3314.06
December 2017 Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017); lottery policies of subgrantee schools; Ohio Revised Code 3314.06

Indicator 1.4: PEER REVIEW. The State uses a peer review process to review and select applications for assistance under this program.

Table 1.4: PEER REVIEW.		
Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Identification and notification to peer reviewers: Ohio’s CSP application stated, “[Peer reviewers] will be recruited from among education practitioners in the state...” (p. 54).</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>March 2017 site visit: ODE’s plans for identifying and notifying peer reviewers were stated somewhat differently across sources and reflected a still-emerging process:</p> <ul style="list-style-type: none"> • Ohio’s draft agreed-upon procedures (AUPs, revised February 8, 2017) indicate “The Department will solicit applications from potential peer reviewers using the same communication means as listed in Section 1.3 [sic] above. Section 1.2 of those AUPs lists “a variety of means including direct e-mails to stakeholders (sponsors, schools, organizations); the Department’s Ed Connections Newsletter and Ohio Ed Updates; as well as posting the information on its website, Facebook, Twitter, “n”, and Instagram” for dissemination of public notice of the CSP grant. • The draft Call for Peer Reviewers states that it will “be posted on the Website as well as promoted thru [sic] Ed Connections Newsletter, Ohio Ed Updates, Ohio Delivery, and emailed to all stakeholders...” • During the site visit, OCS staff stated that the Call for Reviewers would be posted online and through two Department listservs, including one for authorizers. OCS staff also indicated that they would ask their advisory committee to distribute it and consult with the committee to “help get ideas about who we should be targeting for peer reviewers.” <p>--</p> <p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. ODE prepared a notification for potential grant reviewers for the Spring 2017 competition, <i>Grant Readers for Ohio’s CSP Grant</i>, explaining that the review process for its subgrant competition would include a technical review and a peer review, and stating its intention to establish an expert review team comprised of education stakeholders to score the subgrant applications using a detailed rubric with established</p>

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>criteria. The document describes that peer reviewers are selected on the basis of submitted qualifications, receive training to evaluate applications, and must be free of any conflicts of interest to ensure the scoring process is unbiased. More detail is provided in the document through several Q&As.</p> <p>The document specifies minimum and preferred qualifications for a peer reviewer:</p> <ul style="list-style-type: none"> • Minimum qualifications include, but are not limited to, background in one or more of the following areas of expertise: curriculum and instruction, law, governance, management, leadership, finance, school start-up, policy and community school operations. • Preferred qualifications include community school authorizing and accountability, community school policy, community school research and evaluation, community school development and implementation or community school grant administration. <p>ODE publicized the notice widely, including sending it to all community school sponsors and existing community schools in the state, as well as previous grant readers. Other dissemination mechanisms included Ed Connections, reaching approximately 10,000 emails; and ODE’s website, Twitter, and Facebook. ODE staff stated that their strategy for communicating the call for peer reviewers was to try to reach every possible outlet. This included direct outreach by OCS staff as well as network approaches such as asking the CSP Advisory Committee to disseminate the information. Out-of-state contacts were also included.</p>
<p>Composition and qualifications of peer reviewers: Ohio’s CSP application stated, “[Peer reviewers] will be recruited from among education practitioners in the state and will be screened for potential conflicts of interest.” “Each application will be scored by three reviewers.” (p. 54).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>March 2017 site visit: <u>Desired qualifications of peer reviewers:</u> ODE’s description was stated somewhat differently across sources:</p> <ul style="list-style-type: none"> • The draft AUPs state, “Peer reviewers must have direct community school and/or sponsorship knowledge and experience.”

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<input type="checkbox"/> Not specified in application		<ul style="list-style-type: none"> • The draft Call for Reviewers states, “We are seeking peer reviewers from various professions and backgrounds with an understanding of the community school sector and expertise in at least one of the following areas: community school authorizing and accountability, community school policy; community school research and evaluation; community school development and implementation; or community school grant administration. Peer reviewers may have expertise in various geographies, including urban, suburban, and rural communities.” • The draft Peer Review Application uses similar language to the Call for Reviewers but also mentions direct community school knowledge, and experience as a previous Community School Administrator. It asks applicants to self-assess their level of expertise in the 5 areas listed above (Community School Sponsoring and Accountability, etc.), as well as to provide a description of the applicant’s experiences, understanding, relevant experience, and skills. <p><u>Conflict of Interest:</u> The treatment of any conflicts of interest among peer reviewer applicants was unclear at the time of monitoring:</p> <ul style="list-style-type: none"> • The draft AUPs stated, “[Peer reviewers] must...demonstrate no conflicts of interest related to the applicant, the applicant’s intended Management Company, the applicant’s sponsor, or any CSP subgrantee.” • The draft Call for Reviewers warns that “if your organization intends to apply for a grant under any CSP competition, you may not be eligible to serve as a reviewer” and lists three other situations that would present a conflict of interest. • During the site visit interview, two sets of conflict of interest questions for the Peer Reviewer Application were discussed—one in development by legal staff and one contained in the draft Application specific to the program. ODE staff were not able to describe how an identified conflict would affect a reviewer’s potential selection or assignments.

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
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Selection of reviewers: The draft AUPs refer to scoring the peer reviewer applications and vetting the applicants using additional information, with the intention of “[selecting] more reviewers than may be needed for the subgrantee applicant pool...” It is unclear what additional information would be used, though the draft Peer Review Application contains a number of questions about prior monitoring experience on other ODE grants. During the site visit, ODE staff stated that they did not yet have a process for how they would use the information collected through the peer reviewer applications to select peer reviewers. OCS intends to have three reviewers for each application, but expressed that they feared they would not get any applicants. As peer reviewers had not been selected yet, the site visit team could not determine their actual composition and qualifications.

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December 2017 site visit:

This element had been addressed and was being implemented as necessary during the December 2017 site visit. Peer reviewer applicants submitted their application through a third-party vendor contracted by the state, who then submitted qualifying resumes to ODE. ODE convened a panel of 6-7 staff to review and score the resumes based on the minimum and preferred qualifications. Out of 59 resumes reviewed, the 20 with the highest scores were selected. All of those selected had charter school experience at a school, management company, or sponsor organization. All peer reviewers were external to ODE.

ODE used four peer reviewers to score each subgrant application. Because of the small number of applications, ultimately only a total of four peer reviewers were used.

ODE screened the peer reviewers for conflict of interest at two points in the review process. A pre-review form was used to identify if the reviewer was

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Reviewer guidance and training: Ohio’s CSP application stated, “Peer reviewers will be provided with an application evaluation rubric that will specify the criteria against which grants should be judged, and descriptors for awarding points for each criteria. Peer reviewers will be required to participate in a webinar that will review the criteria and discuss the scoring approach.” (p. 54)</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>affiliated with any of the applicants so that the reviewer could be removed from reviewing any applicant with which there was a conflict; a post-review form was also used to check if reviewers identified a conflict while reading the application.</p> <p>In addition to the peer reviewers, ODE used a technical review panel to review applications for eligibility, allowable uses of funds, and application completeness. This panel was comprised of four ODE staff with charter school or fiscal experience and was overseen by the OCS Director. Technical reviewers also completed pre- and post-review conflict of interest forms.</p> <p>March 2017 site visit: The draft AUPs state, “Peer reviewer training will be offered at two different times and will include a common application review and scoring for calibration.” The draft Call for Peer Reviewers is less specific, indicating reviewers will need to participate in an orientation session by webinar of approximately two hours prior to evaluating applications. It also does not mention that a rubric with criteria will be provided to reviewers. During the site visit, OCS described how reviewer training had occurred in the past but stated that the training for peer reviewers for the current grant was not yet developed.</p> <p>--</p> <p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. ODE staff conducted a four-hour Skype training for the selected peer reviewers on Friday, June 16, 2017, the week before the application scoring. The trainers explained the scoring rubric – also published in the RFA and aligned to the Comprehensive Plan – with its criteria, descriptors, and points. The rubric addresses all required sections of the application plus the four competitive preference priorities of strategic replacement, high need location, educational disadvantaged students, and</p>

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Use of peer reviews to select applications for funding: Ohio’s CSP application stated, “The results of the peer review process will be compiled and analyzed. ODE will define a minimum quality threshold for applications that will form a floor. Applications that have not reached the minimum quality threshold will not be funded. ODE will fund applications largely based on points awarded by the peer review process. ODE, however, will reserve the discretion to make awards that do not rely solely on points earned in the interest of meeting key geographic distribution objectives and to avoid any unintended concentrations of schools which could provide capacity in excess of need.” (pp. 54-55)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>proven educational model. The trainers used a scripted PowerPoint and responded to questions.</p> <p>Over the weekend of June 16-18, the peer reviewers were required to review and score a fictional CSP grant application created by ODE designed to illustrate potential application strengths and weaknesses. On Monday, June 19th, department staff conducted a conference call with the peer reviewers to calibrate the scoring of the fictional application. On this call the group reviewed the scoring of each criterion, including each reviewer’s scores and ODE’s expectations. The selected peer reviewers then conducted the actual scoring of applications beginning on Tuesday, June 20th.</p> <p>In addition, OCS conducted training for the ODE technical reviewers on the technical review checklist (also contained in the RFA). The CSP oversight committee reviewed the technical review group’s evaluation of the subgrant applications.</p> <p>March 2017 site visit: During the site visit, OCS staff indicated that they expect to use a consensus process among peer reviewers to arrive at each applicant’s score. OCS had not determined a cut score or the level of applications that would be funded. Staff expressed the expectation that most if not all of the applications received would score high enough to earn an award because only applicants with an effective or exemplary sponsor would be eligible.</p> <p>--</p> <p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. ODE used the results of the technical and peer reviews to select applications for funding. Out of the nine applications submitted, six were rejected in the technical review process because they did</p>

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<input type="checkbox"/> Not specified in application		<p>not provide convincing evidence that the school would be implementing a high-performing charter school model.</p> <p>The peer reviewer scores were used to select the remaining applications for funding. Scores for the section review criteria and competitive preference points entered by the peer reviewers in CCIP were processed by data managers to arrive at an average total score per application. The score analysis procedure, which includes removing outliers from the calculation, is described in the Comprehensive Plan.</p> <p>Page 76 of the RFA indicates that ODE will determine annually the minimum threshold of total points earned (excluding points earned for Competitive Preference Priorities) in order to be recommended for funding. Further, the Comprehensive Plan states that the quality cut score will be determined by natural breaks in the data at a level near 75 percent of the total available points or a minimum of 75 percent if there is no such natural break. All three applications scored by the peer reviewers were above 75 percent and were funded.</p>
<p>Other: The application also noted the role that community education development organizations (CEDOs) would play in selecting applications for funding: “The Department will partner with CEDOs in determining the priority for awards to eligible proposals. While maintaining complete quality control over the award process and grant use, the Department will allow CEDOs to prioritize awards among eligible applicants.” (p.15)</p> <p>Ohio’s CSP grant application described a \$10.25 million recovery district reserve and how these applications would be selected: “\$10.25 million will be reserved for</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>March 2017 site visit: OCS staff stated that they hadn’t thought about CEDO prioritization and were not sure if they would pursue this provision of the grant application.</p> <p>During the site visit, OCS staff stated that they were not sure how they were going to proceed with the recovery district reserve provision of the grant application.</p> <p>--</p> <p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 site visit. As part of its Spring 2017 CSP subgrant application process, ODE identified Needs Assessment Advisory Groups</p>

Table 1.4: PEER REVIEW.

Elements of the State’s peer review process.	Implementation Issue?	Detailed Information Describe components of peer review process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>the creation of high-quality schools in any recovery district designated by the state. Recovery districts are established for persistently under-performing districts in academic emergency status for multiple years. The criteria used to judge these applications will be the same as those used for other applications. The only difference is that schools located in the territory of the recovery district will not be competing with proposals from other parts of the state. For this reserved amount, however, there will still be adherence to the minimum quality threshold...”.</p>		<p>(NAAGs) in three of the state’s major urban areas and invited them to help define the competitive preference priorities for the urban area served by each. ODE held a webinar to explain the opportunity and provided each group with academic data on schools geographically located in their associated traditional public school districts as well as a form to record their locally-defined preference priorities. Although the identified NAAGs declined to participate in setting the competitive priorities for this subgrant competition, they indicated an interest in participating in later rounds. ODE staff stated they will continue to reach out to these three and additional groups for this purpose in later rounds.</p> <p>ODE developed procedures for using the recovery district reserve funds described in its CSP grant application, wherein successful CSP subgrant applicants in school districts designated in academic distress would be funded from this reserve. The procedures are described on page 7 of OCS’s May 2017 document, <i>Ohio’s CSP Subgrant Review and Award Process</i>. However, none of the subgrant applicants from the Spring 2017 competition were eligible to be funded from the reserve fund and it is unclear if there will be any future subgrant applicants who will be eligible. OCS staff stated that the reserve will be maintained so that it will be there should there be a demand to use it.</p>

Sources: *March 2017 Ohio CSP Grant Application; Draft AUPs, Draft Call for Peer Reviewers, Draft Peer Reviewer Application*
December 2017 Grant Readers for Ohio’s Charter School Program (CSP) Grant, Pre-Review Conflict of Interest Statement, Post-Review Conflict of Interest Statement, Peer Review Trainings Held by the Department, Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017), Ohio CSP Grant Administration Comprehensive Plan, Peer Review Scores and Comments for Independent Monitor, Technical Review Cover Sheets, Sample Decline Technical Letter, NAAG Webinar 4-19-17, Summary of Data Provided to the Needs Assessment Advisory Groups, Needs Assessment Advisory Group: Locally-Defined Preference Priorities, Ohio’s CSP Subgrant Review and Award Process

Indicator 1.5: PROGRAM PERIODS. CSP subgrants awarded by the State do not exceed the maximum program periods allowed.

Table 1.5: PROGRAM PERIODS.		
CSP subgrants awarded by the State do not exceed the maximum program periods allowed of:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Award not more than 36 months, of which the eligible applicant may use —	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: ODE makes annual grants only. The grant periods are July 1 – June 30. CSP grants are anticipated to be made in 3 separate annual awards: planning (up to \$100,000), Year 1 implementation (up to \$350,000), and Year 2 implementation (up to \$250,000). A subgrantee receiving all three phases of CSP funding would receive awards totaling not more than \$700,000 and 36 months. -- December 2017 site visit: No changes were observed during the December 2017 visit; ODE was still implementing this element as necessary. In addition, pp. 10-11 of the April 2017 RFA specifies the duration and types of subgrants. In the example given of a community school that has not yet opened for students and receives both planning and implementation awards, the award period would not exceed 36 months.
(A) not more than 18 months for planning and program design;	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).

Table 1.5: PROGRAM PERIODS.

CSP subgrants awarded by the State do not exceed the maximum program periods allowed of:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>March 2017 site visit: ODE makes annual grants only. CSP planning grants are anticipated to be made for one year (12 months) only.</p> <p>--</p> <p>December 2017 site visit: No changes were observed during the December 2017 visit; ODE was still implementing this element as necessary. Page 10 of the April 2017 RFA is clear that planning grants are for one year, not to exceed 12 months.</p>
<p>(B) not more than 24 months for the initial implementation of a charter school; and</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: ODE makes annual grants only. CSP implementation grants are anticipated to be made in two one-year awards: Year 1 implementation grants and Year 2 implementation grants. The total period of implementation funding for a subgrantee receiving both Year 1 and Year 2 implementation grants would not exceed 24 months.</p> <p>--</p> <p>December 2017 site visit: No changes were observed during the December 2017 visit; ODE was still implementing this element as necessary. Pp. 10-11 of the April 2017 RFA makes clear that implementation grants are for community schools in their first and second years of operation. In the example given of a Year One Implementation Award, the school’s CSP funding period would not exceed 24 months. All three of the successful subgrantees received an implementation year 1 subgrant for fiscal year 2018 with the opportunity to receive a year 2 implementation subgrant if quality and operational criteria are met.</p>

Table 1.5: PROGRAM PERIODS.

CSP subgrants awarded by the State do not exceed the maximum program periods allowed of:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
(C) not more than 2 years (24 months) to carry out dissemination activities described in Section 5204(f)(6)(B).	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).

Sources: *March 2017* *Ohio CSP Grant Application, Request for Applications, Ohio Community Schools Program, Community School Application for a Planning/Implementation Subgrant (draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft, draft provided as Indicator 1.1.1 Ohio.RFA.finaldraft for tech editing 02 24 2017)*

December 2017 *Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017); grant award letters to subgrantees*

2. CHARTER SCHOOLS PROGRAM AND CHARTER SCHOOL QUALITY

One of the key goals of the CSP is to support and encourage the development of high-quality charter schools. To do so, the SEA needs to establish policies and practices that promote high-quality charter schools. This section focuses on how the SEA furthers high quality in authorizing practices and authorizer oversight, charter school flexibility and autonomy, subgrant assessment and awards, supporting educationally-disadvantaged students, subgrantee monitoring, dissemination of best or promising practices, and assessing progress toward its own application objectives. It includes seven indicators that cover the State's role in:

- Providing for quality authorizer practices, including authorizer oversight and monitoring
- Affording charter schools a high degree of flexibility and autonomy
- Awarding CSP subgrants on the basis of the quality of the applications
- Assisting educationally-disadvantaged students
- Monitoring subgrantee achievement of project objectives
- Disseminating information and best practices of charter schools
- Assessing its application objectives

Indicator 2.1: QUALITY AUTHORIZING PRACTICES. State laws, regulations, or other policies provide for quality authorizing practices, and the SEA monitors and holds accountable the authorized public chartering agencies in the state so as to improve the capacity of those agencies to authorize, monitor, and hold accountable charter schools.

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools		
Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>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.</p> <p><input type="checkbox"/> Not specified in application</p> <p>As noted in the grant application, authorizers are required to review the charter school’s operations and its compliance with Federal and State laws and the terms of the contract. Required authorizer reviews include a pre-opening review; monthly reviews of financial and enrollment activity; twice annually comprehensive reviews; and renewal, termination/non-renewal, or suspension review. In addition, authorizers are required to provide ongoing monitoring of their schools’ academic and operational performance.</p> <p>Separately, ODE reviews authorizers through its Authorizer Quality</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>Sponsors monitor the community schools’ compliance with applicable laws and terms of the contract during the pre-opening monitoring visit conducted each July and August. Sponsors monitor and evaluate the fiscal performance and operation of the community schools through monthly reviews of financial and enrollment activity and twice yearly comprehensive reviews. Authorizers make written reports from school site visits available to ODE, upon request. Further, OAC 3301-102-05 requires sponsors to send academic and fiscal performance reports to parents annually.</p> <p>Additionally, the SEA publishes an annual report on its community schools every year, as required by ORC 3314.016. This report is focused on: academic performance; sustained student enrollment; fiscal accountability; and sponsor accountability and oversight. Moreover, for all its public schools, the SEA has an annual report card, which includes a letter grade.</p> <p>The SEA’s annual evaluation of community schools is published online and these reports go back to the 2003-2004 school year.</p> <p>--</p> <p>December 2017 site visit:</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Performance Review (AQPR). The AQPR evaluates the performance areas of: agency commitment and capacity, application process and decision-making, performance contracting, oversight and evaluation, termination and renewal decision-making, and technical assistance.</p>		<p>While ODE does not have authority to regulate authorizer practices, the State includes period review as an element on which it rates authorizers and has provided training on charter contracts that stresses high-stakes review as an expected practice. Additionally, ODE has limited eligibility to CSP subgrants to developers from authorizers who conduct period reviews at least once every five years, in accordance with Absolute Priority 1. As ODE was implementing this restriction as necessary, the State is complying with the expectation for CSP despite the sponsor issues described below.</p> <p>The 2017-18 Sponsor Quality Practices Rubric, in C.02, evaluates sponsor contracts to verify high stakes reviews are occurring at least once every five years. The rubric assigns zero points (out of a possible 4 points) for authorizers that do not conduct this high-stakes reviews. A review of sponsor contracts by the site visit team showed that more than half of the eight new charter contracts executed to begin in the 2017-2018 school year had a term of six years. This sponsor was not conducting a high-stakes review every five years. Additionally, in authorizing a contract for longer than the sponsor agreement’s term, this sponsor was not in compliance with its sponsor agreement with the State.</p>
<p>The State takes steps to ensure that the periodic review and evaluation at least once every five years takes place.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
<p>In the grant application, ODE proposed to evaluate authorizers annually on three components, one of which is quality practices. Quality practices include assessing the transparency of the charter contract, data-driven renewal and intervention decisions, annual and cumulative school reports,</p>		<p>March 2017 site visit: ODE evaluates sponsors annually on quality authorizing practices through the sponsor evaluation, as proposed. Specifically, the indicator, Contract Terms for Renewal and Non-Renewal, is in the Performance Contracting section of the evaluation. Sponsors must include academic performance measures in their contracts with community schools, which gives the sponsor the ability to terminate the contract and sponsors must conduct a high-stakes review at the end of the charter term.</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>and a high-stakes review at least every five years.</p> <p>The application notes that both law (ORC 3314.03) and rules (OAC 3301-05) require the annual evaluation of authorizers.</p>		<p>Initial community school contracts must not exceed five years in length (ORC 3314.03 (A)(k)(13) and upon renewal, may be for any length of time (ORC 3314.03 (E). Established schools may therefore not be subject to a high-stakes review at least once every five years if they are under a contract that exceeds five years.</p> <p>Furthermore, at the time of the site visit, although all sponsors were required to go through the sponsor evaluation process (i.e., all sponsors except those with schools open less than two years or with schools serving predominantly students with disabilities), there were varying degrees of accountability based on sponsor type. The SEA noted that sponsors receiving a poor rating would not be allowed to open new schools under the evaluation process; however, the SEA-operated sponsor was not subject to the same limitations but did note they exercised revocation proceedings on all charters rated as poor. All sponsors will be required to establish a contract with ODE by July 1, 2017 at which time all sponsors will be held accountable for contract requirements.</p> <p>--</p> <p>December 2017 site visit:</p> <p>At the time of the visit, all but two sponsors were in a sponsor agreement with ODE, and ODE was able to ascertain which sponsors were conducting high-stakes reviews at least once per five years through the AQPR. ODE was implementing this element as necessary.</p> <p>The two sponsors not under contract with ODE were grandfathered in under statute and would not need to enter into a contract unless they fell into the ineffective category for two years in a row. In addition, the Office of School Sponsorship was not required to enter into a sponsor contract. However, this office is evaluated annually and subject to oversight and corrective action at the discretion of OCS.</p> <p>In order for a sponsor’s schools to be eligible for a CSP subgrant, the sponsor must receive an overall rating of effective or exemplary on the sponsor evaluation and meet or exceed (scoring a 3 or higher) on the “Oversight and Evaluation: Site Visit Reports” and “Termination and Renewal Decision-making: Renewal and Non-renewal Decisions” standards in the Sponsor Quality Practices Rubric.</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The review and evaluation 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.</p> <p><input type="checkbox"/> Not specified in application</p> <p>As noted in the grant application, authorizers are required to review the charter school’s operations, compliance with Federal and State laws and the terms of the contract, and intervention and renewal decision-making.</p> <p>Required authorizer reviews include a pre-opening review; monthly reviews of financial and enrollment activity; twice annually comprehensive reviews; and renewal, termination/non-renewal or suspension review.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>Sponsors hold their community schools accountable for meeting the terms of the school’s charter and meeting or exceeding the student academic achievement requirements and goals during renewal, termination/non-renewal, or suspension reviews. Tools used by sponsors to collect a body of evidence are pre-opening onsite visits; monthly reviews of financial and enrollment activity; twice annual comprehensive reviews; and renewal/non-renewal or suspension reviews.</p> <p>A review by the site visit team of ten randomly selected community school contracts available on the SEA website showed that only 30% included performance metrics. The site visit team notes that the performance metrics in the charter contracts and the authorizer reviews based on them may not be sufficient to determine whether the charter schools are meeting the terms of their charters and meeting and exceeding the student academic achievement requirements of the law.</p> <p>--</p> <p>December 2017 site visit:</p> <p>ODE was implementing this element as proposed. Authorizers are held accountable for using the period review to determine if charter schools are meeting the student and academic achievement goals of their contract through the annual evaluation process. Evaluation criteria are detailed in the Sponsor Quality Practices Rubric and are publicly reported each year. Sponsor evaluation results inform the contract between ODE and the authorizer. ODE staff reported that some sponsors revised contracts with schools in order to obtain a higher sponsor rating, by filing an addendum. Further, about 20 sponsors ceased sponsoring in 2017 rather than complying with new expectations for sponsors.</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The application states that authorizers are evaluated each year based on three components, one of which is quality practices. Quality practices assess transparency of the charter contract; data-driven renewal and intervention decisions; annual and cumulative school reports based on multiple sources of data; and a high-stakes review at least every five years.</p> <p>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.</p> <p><input type="checkbox"/> Not specified in application</p> <p>As noted in the grant application, Ohio rule and law ensure that authorizers have a legal basis for taking appropriate action against a charter school, as necessary. Authorizer-school contracts must include a provision that authorizers can assume the operation of the school. Authorizers may place a school on probationary status, suspend the school’s operation, or terminate a school’s contract.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>A review of the eight new community school contracts executed this year reveal that performance measures are included in all contracts. Some contracts also note the metrics that will be used, benchmarks for different ratings, and performance targets.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Authorizers have the legal basis for taking appropriate action against charter schools as proposed in the grant application. A review of several pre-opening reviews, monthly review reports, and twice annually comprehensive reviews indicate that non-compliance with health and safety standards, failure to meet accepted standards of fiscal management, and violation of charter provisions could result in consequences including suspension of the school’s operation.</p> <p>Sponsors have the legal authority to take appropriate action against community schools, as proposed in the grant application. The SEA provided a spreadsheet with more than 100 community schools that have closed since 2011. This document includes components to determine if a sponsor is closing low-performing community schools. These components are: Contract Termination, Evidence-based Renewal, Cumulative Report on Performance, and Closure Process.</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The application also explains that in order for an authorizer to earn an effective or exemplary score on the quality practice rubric for the standard titled, Termination and Renewal Decision-making, Substandard: Contract Termination, the authorizer must terminate a charter school’s contract when there is evidence of extreme underperformance, an egregious violation of law, a violation of the public trust that jeopardizes students’ health and well-being or public funds, or unfaithfulness to the terms of the contract.</p>	<p>--</p>	<p>December 2017 site visit: There was no change noted during the December 2017 visit; the grantee was implementing this element as proposed.</p>
<p>Each charter school 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 authorizer.</p> <p><input type="checkbox"/> Not specified in application</p> <p>The application noted that ORC 3314.03 details what should be included in an authorizer’s contract with a charter school, which establishes the rights of both parties. This includes the</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Both program and legal staff at ODE review initial and renewal contracts between the sponsor and community school for contract provisions required by law and legal compliance.</p> <p>In a random review of ten community school contracts available online conducted by the site visit team, the school and authorizer’s responsibilities were consistently included in contracts. However, explicitly noting rights of the parties is not required by statute or rule and were not found in the contracts that were reviewed.</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>authorizer’s obligations to the school, and the school’s obligations to the authorizer.</p> <p>In addition, the application noted that school and authorizer rights are implicitly contained in contracts that include provisions for monitoring the school’s compliance, a description of the metrics and expectations for evaluating the school, and all laws with which the school must comply.</p>		<p>--</p> <p>December 2017 site visit:</p> <p>The eight new schools that opened in Fall 2017 are sponsored by two nonprofit authorizers. A review of the template contracts used by these two sponsors showed that neither entity includes rights of the parties in their contracts; however, responsibilities are included. Among these eight schools are all three of the current CSP subgrantees.</p>
<p>Charter schools conduct annual, timely, and independent audits of the school’s financial statements that are filed with the school’s authorized public chartering agency.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p>
<p><input type="checkbox"/> Not specified in application</p> <p>The application noted that ORC 117.10 requires an annual, independent financial audit of all charter schools. The authorizer is involved during the audit process and attends the exit conference with the school and the auditors. Each audit is shared with the school, authorizer, published to the Auditor of State’s website, and if material findings are noted, a notice is also sent to ODE.</p>		<p>March 2017 site visit:</p> <p>Annual financial audits would be conducted by the State Auditor or a financial auditor retained by the charter school. ORC 3314.03 (A)(11)(g) (effective April 16, 2017) requires the community school’s board to provide a copy of the school’s financial audit to their sponsor within four months of the end of the fiscal year. ODE program and grants fiscal management staff review the audit reports, submitted to the electronic CCIP grants management system by the school’s sponsor, to verify compliance.</p> <p>--</p> <p>December 2017 site visit:</p> <p>No change was noted during the December 2017 visit; the grantee was implementing this element as proposed.</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Charter schools are held accountable to demonstrate improved student academic achievement.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p>
<p><input type="checkbox"/> Not specified in application</p>		<p><input type="checkbox"/> Promising practice(s) identified (explain below).</p>
<p>The application stated that the sponsor evaluation process ensures that the State’s authorizers hold charter schools accountable for their schools’ academic achievement. Authorizers provide annual reports summarizing school performance through the sponsor evaluation instrument’s section on oversight and evaluation. Authorizers are also expected to establish measures for student proficiency, academic growth, graduation rates, attendance, and post-secondary enrollment (if applicable).</p>		<p>March 2017 site visit: ORC 3314 lists contract requirements, which includes academic goals and performance metrics to monitor progress toward academic goals. Although ODE reviews community school contracts for compliance with required components, it is not clear that the review process ensures that community schools are held accountable for demonstrating improved student academic achievement. A review of ten community school contracts conducted by the site visit team demonstrated a range of academic goals and performance metrics, a majority of which were either not included in the contract or appeared to be standard contract language that was not specific to the school (i.e., identical language used in multiple contracts reviewed).</p>
<p>In addition, Ohio’s charter schools are required to demonstrate improved academic achievement or face closure under State law. Report cards for general education charters are required by ORC 3314.02 while reports for dropout prevention and recovery charter schools under ORC 3314.017.</p>		<p>The SEA developed school report cards for community schools in 2009, as amended. During the transition to new State tests in mathematics and English language arts, Ohio suspended many of the consequences of the tests for 2014-15, 2015-16, and 2016-17 school years, including closure of community schools for poor performance.</p> <p>Since the SEA relies on sponsors to ensure community school quality, there is the potential for a myriad of performance expectations to result in less than optimal results. The SEA should consider increasing the sponsors’ capacity to effectively hold charter schools accountable for demonstrating improved academic performance. The SEA may think about the benefits to providing model contract language and related training for sponsors.</p> <p>--</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools

Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>December 2017 site visit:</p> <p>The grantee had addressed the issues described from the March 2017 visit and was implementing this element as proposed. A site team review of community school contracts for the eight new schools opened this year indicated that all contracts included at least a list of performance metrics. Some contracts had additional detail that benchmarked performance levels or included targets for performance.</p>
<p>All authorizers use student academic achievement for all groups of students as one of the most important factors when determining to renew or revoke a school’s charter.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
<p><input type="checkbox"/> Not specified in application</p> <p>According to the application, whether by authorizer action or as a result of Ohio’s automatic closure law, charter schools in the state have closed for failing to demonstrate improved academic achievement. As Local Report Cards and their measures were phased in for Ohio schools from years 2012-2013 through 2014-2015, so too were elements evaluated for school closure. ORC 3314.35 requires automatic closure of schools earning a D or F in two of three consecutive years and fails to meet expected value-added gains.</p>		<p>March 2017 site visit:</p> <p>ORC 3314.07 lists four reasons a charter may not be renewed or revoked, including extreme underperformance, an egregious violation of law, a violation of the public trust that jeopardizes students’ health and well-being or public funds, or unfaithfulness to the terms of the contract.</p> <p>Because the SEA’s accountability law for school closures permits a safe harbor, the automatic closure law was suspended until report cards resume for the 2017-18 school year.</p> <p>--</p> <p>December 2017 site visit:</p> <p>The grantee was implementing this element as necessary at the time of the visit. Schools receiving a C or higher on the school report card are eligible for renewal consideration. Schools in safe harbor from automatic closure can still be closed under their community school contract.</p>

Table 2.1A: QUALITY AUTHORIZING PRACTICES Periodic Review, Evaluation, and Oversight of Charter Schools		
Periodic review, evaluation, and oversight of charter schools	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The SEA monitors and holds accountable authorized public chartering agencies, so as to improve the capacity of those agencies to authorize, monitor, and hold accountable charter schools. (See Table 2.2c for detailed options.)</p> <p><input type="checkbox"/> Not specified in application</p> <p>The application explained that the State’s annual evaluation of authorizers holds authorizers accountable through the potential removal of their ability to sponsor. The State’s evaluation includes a review of academic performance; sustained student enrollment; fiscal accountability; and authorizer accountability and oversight, as required by statute.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>As required by statute, all but a few sponsors must enter into a contract by July 1, 2017 with the SEA. The contract details sponsor standards and serves as the foundation for accountability. Through annual evaluation, if the sponsor does not meet these performance standards, the contract may be severed. As mentioned above, this process is new and still in its first year of implementation. After July 1, most sponsors will be required to comply with their sponsor contracts with the SEA and be included in the authorizer evaluation. At the time of the site visit, the SEA’s plan to hold authorizers accountable had not yet been fully enacted since State/sponsor contracts were not due until July 1, 2017.</p> <p>--</p> <p>December 2017 site visit:</p> <p>The grantee continued to implement the element as proposed during the December 2017 visit. The State has codified its CSP grant program in a Comprehensive Plan, which includes sections on Sponsor Evaluation and Quality Control. Through the sponsor evaluation process, ODE monitors which sponsors, and their schools, are eligible for the CSP grant.</p>

Sources: *March 2017 Ohio Revised Code, Quality Practices Spreadsheet 2014-15*
December 2017 Ohio CSP Grant Comprehensive Plan, Request for Application-CSP, Sponsor Quality Practices Rubric, New Schools 2017-2018, Quality Document Upload Guidance-Preliminary

Table 2.1B: QUALITY AUTHORIZING PRACTICES Oversight of Authorizers.

Oversight of authorized public chartering agencies	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Oversight of authorized public chartering agencies – 1) The SEA ensures that authorized public chartering agencies are seeking and approving charter school petitions from developers with the capacity to create high-quality charter schools;</p> <p><input type="checkbox"/> Not specified in application</p> <p>As noted in the grant application, criteria regarding the approval of petitions are covered in one of the six areas of the sponsor evaluation. Authorizers are expected to provide evidence of an applicant’s comprehensive application and capacity to successfully execute its plans. The review and approval process should include a detailed review of the written application, an in-depth interview with finalists, and a thorough background review of the applicant’s experience and capacity.</p> <p>In considering petitions, authorizers determine the extent to which there is: a clear and compelling mission and vision, a quality educational program, a sustainable business, an effective governance and management structure, and quality staffing. Applicants must explain any never-opened, terminated, or non-renewed school, while also documenting educational, organizational, and financial performance records based on all existing schools.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The sponsor evaluation process includes Application Process, Timeline, and Clarity of Directions; Application Depth; Rigorous Criteria; Reviewer Expertise; Protocols and Training; and Rigorous Decision-Making.</p> <p>The first sponsor evaluation findings were reported in the Fall of 2016 and quality improvement plans were submitted in December. These plans are nascent and have not yet demonstrated effectiveness.</p> <p>ODE has consulted with NACSA and through State law has adopted NACSA’s <i>Principles & Standards for Quality Charter School Authorizing</i>, one of these standards is Application Process and Decision Making.</p> <p>--</p> <p>December 2017 site visit: The grantee was implementing this element as proposed during the visit. Additionally, OCS had conducted a training for sponsors on the topic of best practices for quality authorizing in August 2017 and included a guest speaker with charter school authorizing expertise.</p> <p>The 2016-2017 sponsor ratings released on November 14, 2017 included 2 exemplary, 21 effective, 13 ineffective, and 8 poor ratings. Of the 21 sponsors receiving a poor rating last year, only two are still sponsors. Both are currently utilizing the appeal process.</p>

Table 2.1B: QUALITY AUTHORIZING PRACTICES Oversight of Authorizers.

Oversight of authorized public chartering agencies	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>2) The SEA ensures that authorized public chartering agencies are approving charter petitions that incorporate evidence-based school models;</p> <p><input type="checkbox"/> Not specified in application</p> <p>Criteria for the application (petition) process and decision-making, though not using the term evidence-based models, assumes that the petition provides the kinds of information and data to support the education program proposed. For example, the criteria in the AQPR for application process and decision-making confirm that the authorizer’s application calls for an explanation of the academic impact of the proposed school model on the students and charter along with an explanation of the school’s curriculum, its alignment to the Ohio Standards and benchmarks, specific instructional materials to be used to implement the curriculum, and the process the school will follow to evaluate, review, and revise its curriculum on an annual basis. Data must include a needs assessment of the school’s target neighborhoods and student populations.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The sponsor evaluation process includes a review of criteria for the charter application process and decision-making, as proposed. However, the criteria do not require authorizers to provide information and data to support the education program as articulated in ODE's application. Sponsors are now working with NACSA to improve their application review process.</p> <p>The SEA hopes that by improving sponsor quality, more operators that have proven to be successful in other areas of the country will want to open community schools in Ohio.</p> <p>--</p> <p>December 2017 site visit: The grantee had implemented a new training for authorizers as of the December 2017 visit, but the rubric against which the State evaluates sponsors did not include the requirement that applicants explain and provide evidence for their school model. The Sponsor Quality Performance Rubric, in Indicator B.02, Rigorous Criteria for New Schools, required the applicant to describe seven areas of school planning and operations, as was demonstrated during the March 2017 visit, but it did not ask whether the applicant has an evidence-based approach.</p> <p>ODE provided training for authorizers at the beginning of the 2017-2018 school year at which they utilized outside authorizer expertise. This training included conducting a high-quality application process.</p>

Table 2.1B: QUALITY AUTHORIZING PRACTICES Oversight of Authorizers.		
Oversight of authorized public chartering agencies	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>3) The SEA ensures that authorized public chartering agencies are establishing measurable academic and operational performance expectations for all charter schools that are consistent with the State’s definition of a high-quality charter school;</p> <p><input type="checkbox"/> Not specified in application</p> <p>The application stated that ODE reviews each charter contract to ensure legal compliance and that ODE has developed examples of performance frameworks for use in charter contracts. ODE has insisted authorizers update their contracts, if needed, with performance frameworks that are appropriate, comprehensive, measurable, and specific in their metrics, as well as in the consequences and benefits of achievements of those goals and outcomes. Moreover, the authorizer review process reviews the extent to which rigorous and measurable gains criteria are in use.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Program and legal staff review charter contracts to ensure compliance with contract requirements and applicable laws, as proposed. Further, ODE has developed model performance frameworks that may be used in charter contracts and evaluates sponsors if they have used these performance measures. However, in a review of ten randomly-selected community school contracts conducted by the site visit team, only one had a specific performance accountability framework that would align with the SEA’s definition of high-quality charter school. Sponsors may need technical assistance to improve measurable academic and operational performance expectations in their community school contracts.</p> <p>The SEA and sponsors have begun to consult with external experts to improve academic performance, but that is at the beginning stage of development. The SEA will enter into performance agreements with sponsors by July 1, 2017 at which time the SEA will have more authority to influence expectations of sponsors.</p> <p>--</p> <p>December 2017 site visit: The grantee was implementing this element as proposed during the visit. Of the eight new school contracts executed in 2017, all included performance frameworks and some included specific metrics, benchmark levels, and performance targets.</p>

Table 2.1B: QUALITY AUTHORIZING PRACTICES Oversight of Authorizers.

Oversight of authorized public chartering agencies	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>4) The SEA ensures that authorized public chartering agencies are monitoring their charter schools on at least an annual basis;</p> <p><input type="checkbox"/> Not specified in application</p> <p>The application stated that as required in ORC 3314.03(D), an authorizer must monitor and evaluate the academic and fiscal performance and the organization and operation of the charter school at least annually. Authorizers are also required to conduct comprehensive site visits at least twice annually and conduct an onsite review every year prior to the school’s opening.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Authorizers monitor their charter schools through annual reports submitted to the SEA and verified during the sponsor evaluation process, twice annual comprehensive site visits, and a pre-opening onsite visit conducted every year. The sponsor evaluation process verifies that these monitoring activities take place through a representative random sampling of all sponsors. Required site visits are verified by program staff.</p> <p>--</p> <p>December 2017 site visit: No change was noted during the December 2017 visit; the grantee was implementing this element as proposed.</p>
<p>5) The SEA ensures that authorized public chartering agencies are basing renewal decisions on a comprehensive set of criteria which are set forth in the charter or performance contract; and revoking, not renewing, or encouraging the voluntary termination of charters held by academically poor-performing charter schools;</p> <p><input type="checkbox"/> Not specified in application</p> <p>The application stated that authorizers base renewal decisions on objective evidence as defined</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The sponsor evaluation process evaluates whether sponsors are basing renewal decisions on criteria set forth in the charter or performance contract, as proposed. Sponsors that do not meet the criteria are not explicitly ranked lower since the sponsor evaluation does not weight criteria. Sponsors that are rated ineffective or poor are subject to a quality improvement plan or revocation of their sponsoring</p>

Table 2.1B: QUALITY AUTHORIZING PRACTICES Oversight of Authorizers.

Oversight of authorized public chartering agencies	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>by the performance framework in the charter contract. In addition, authorizers only grant renewals to schools that are fiscally and organizationally viable based on criteria in the school’s performance contract, which includes rigorous and specific academic goals.</p>		<p>authority. At the end of the 2016-2017 school year, the first sponsors will lose their sponsoring authority due to under-performance.</p> <p>In addition, the SEA defines poor-performing for all public schools as those receiving a D or F on the school report card, according to ORC 3302.03. Charter schools that meet the SEA’s definition of academically poor-performing will be subject to the SEA’s automatic closure law after the 2017-18 school year as reiterated in ORC 3314.35.</p> <p>--</p> <p>December 2017 site visit: No change was noted during the December 2017 visit; the grantee was implementing this element as proposed.</p>
<p>6) The SEA ensures that authorized public chartering agencies are providing public reports on the performance of their portfolios of charter schools on an annual basis;</p> <p><input type="checkbox"/> Not specified in application</p> <p>The application stated that ORC 3314.03 (D)(3) requires the authorizer to report the results of their school evaluations each year. These are published on ODE’s website.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Sponsors submit their annual reports to ODE; other school review reports are available upon request. These annual reports are published on the SEA website by sponsor.</p> <p>--</p> <p>December 2017 site visit: No change was noted during the December 2017 visit; the grantee was implementing this element as proposed.</p>

Table 2.1B: QUALITY AUTHORIZING PRACTICES Oversight of Authorizers.		
Oversight of authorized public chartering agencies	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>7) The SEA ensures that authorized public chartering agencies are supporting charter school autonomy;</p> <p><input type="checkbox"/> Not specified in application</p> <p>The application noted that each school is established as a public benefit corporation (ORC 1720), and in addition, the quality sponsor review process requires the authorizer to provide evidence that it grants autonomy to charter school governing boards in operations.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The Oversight and Evaluation area of the sponsor evaluation process requires sponsors to provide evidence of respecting governing authority autonomy in operations, as proposed. However, no evidence was found to demonstrate the majority of charter schools were operating with autonomy, and there is a potential issue with conversion charter school autonomy. A review of ten contracts demonstrated contract provisions that may compromise autonomy such as: 1) Required sponsor-provided financial services; 2) Required sponsor-provided special education services; 3) Mandatory leases for school district-owned properties; and 4) The mandatory employment of a school district employee as Superintendent for the community school. Furthermore, at least half of the contracts required the school to recognize the sponsor’s collective bargaining agreement. (Collective bargaining agreements in and of themselves are not an issue, but the requirement to use them may compromise a charter school’s autonomy.)</p> <p>--</p> <p>December 2017 site visit: The grantee had addressed the issue with autonomy limitations and was implementing this element as proposed. Following the adoption of HB2, ODE anticipates fewer issues with conversion charter school autonomy. Since the last monitoring visit, ODE had reviewed many community school contracts, in particular conversion school contracts, to ensure autonomy was present. Authorizers that were not in compliance were notified. As a result, ODE staff reported anecdotally that many conversion schools were closing due to the new requirements in HB2.</p>

Table 2.1B: QUALITY AUTHORIZING PRACTICES Oversight of Authorizers.

Oversight of authorized public chartering agencies	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>8) The SEA ensures that authorized public chartering agencies are ensuring the continued accountability of charter schools during periods of transition to new State standards and assessments.</p> <p>The application explained that State law had made provision for the transition of assessment systems. District and school reports would continue to be generated. This allowed charter schools, in addition to all schools, to be held accountable for their performance during transition. Contracts must include provisions that charter schools will comply with academic performance requirements, including compliance with State assessments.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The SEA considers community schools in the same manner as all public schools, accountable for taking the SEA assessment and publicly reporting the school’s results. School report cards have continued to be generated during the current transition to new State assessments, the last being generated for the 2015-16 school year.</p> <p>--</p> <p>December 2017 site visit: The grantee was implementing this element as proposed. Report cards for the 2016-17 school year had been released by the December 2017 visit.</p>

Sources: *March 2017 Ohio Revised Code, Review of Community School Contracts*
December 2017 Review of Community School Contracts and Operator Agreements, Sponsor Quality Practices Rubric, Ohio CSP Grant Comprehensive Plan, Request for Application-CSP, New Schools 2017-2018

Table 2.1C: QUALITY AUTHORIZING PRACTICES Authorizing and Monitoring.

High quality authorizing and monitoring processes (as applicable based on content in approved grant application)	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>High-quality authorizing and monitoring processes – All authorized public chartering agencies in the State use one or more of the following: 1) Frameworks and processes to evaluate the performance of charter schools;</p> <p>ORC 3314.03(A)(3) requires charter contracts to include “academic goals to be achieved and the method of measurement that will be used to determine progress toward those goals, which shall include the statewide achievement assessments.” ORC 3314.03(A)(4) requires “performance standards by which the success of the school will be evaluated by the (authorizer).”</p> <p>Ohio’s authorizers base the renewal process and renewal decisions on a comprehensive analysis of objective evidence.</p> <p>Clear violations of the law or public trust identified during site visits or through other means represent grounds for the termination/revocation of a charter, particularly as they apply to health and safety, governance, finance, operations, and education programs.</p> <p>OAC 3301-102-05 mandates that charter school authorizers make written reports from school site visits available to ODE, upon request, and requires authorizers</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The sponsor evaluation instrument includes up to 24 compliance items under the categories Commitment and Capacity, Application Process and Decision-Making, Performance Contracting, Evaluation and Oversight, Termination and Renewal Decision-Making, and Technical Assistance and Sponsor Requirements in Rule and Law, as proposed.</p> <p>In the spreadsheet of 101 community school closures since the 2010-2011 school year provided by ODE, 11 of the closures were due to the closure law and 34 schools were ordered to close (e.g., contract noncompliance and nonviable finances). The rest of the schools closed voluntarily.</p> <p>Sponsors submit their annual reports to ODE and other school review reports are available upon request. These annual reports are published on the SEA website under each sponsor.</p> <p>The adoption of HB2 requires sponsors to evaluate their community schools each year and the SEA conducts a legal review of community school contracts. A review of ten community school contracts showed that only one had an accountability framework to assess the quality of the schools.</p> <p>--</p>

Table 2.1C: QUALITY AUTHORIZING PRACTICES Authorizing and Monitoring.		
High quality authorizing and monitoring processes (as applicable based on content in approved grant application)	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
to send academic and fiscal performance reports to parents annually by November 30. Additionally, authorizers are obligated to submit annual performance reports to ODE for their authorized schools under ORC 3314.03(D)(3).		<p>December 2017 site visit:</p> <p>The grantee had addressed the lack of performance frameworks in contracts by the December 2017 visit and was implementing this element as proposed. A review by the site team of the eight community school contracts for schools opening in Fall 2017 showed that all had a performance framework in their contracts, and that it was specific enough to provide evidence that the two parties had agreed on an objective process to monitor community school performance.</p> <p>In addition, the SEA's Comprehensive Plan explains how sponsors will be evaluated and rated in the Sponsor Evaluation and Quality Control section. Sponsor ratings are published on the ODE website each year.</p>
<p>2) Clear and specific standards and formalized processes that measure and benchmark the performance of the authorizer and provide for the annual dissemination of information on such performance;</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).
<p>The grant application explained that the Quality Practices Component of the annual sponsor evaluation is based on six quality practices, which are aligned with NACSA's principles and standards for authorizing. Three categories—agency commitment and capacity, application decision-making, and renewal and decision-making—are weighted. Possible ratings for the sponsor evaluation are exemplary, effective, ineffective, or poor.</p>		<p>March 2017 site visit:</p> <p>ORC 3314.016 requires annual evaluation of sponsors and these reports are published online. The first sponsor evaluation ratings were made public in the Fall of 2016. The SEA contracted with a third party to conduct the evaluations, Although sponsor evaluations are new to the SEA, the process has been implemented well and is strengthened by the fact that the criteria for evaluation are set in statute.</p> <p>--</p> <p>December 2017 site visit:</p> <p>No change was noted during the December 2017 visit; the grantee was implementing this element as proposed.</p>

Table 2.1C: QUALITY AUTHORIZING PRACTICES Authorizing and Monitoring.		
High quality authorizing and monitoring processes (as applicable based on content in approved grant application)	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>3) Authorizing processes that establish clear criteria for evaluating charter applications; or</p> <p>In the grant application, the State specified that authorizers are expected to follow a documented, systematic process for applications that cover four main areas of school planning and operations (education plan, governance, finance, and accountability). It is expected that the authorizer will involve multiple reviewers in assessing the written application, who have broad expertise and bring in others with specific knowledge, if needed. Authorizers are expected to train the reviewers on the use of the rubric, including rigorous criteria and differentiated scoring. The process calls for an applicant interview, additional due diligence in vetting, and engaging in data-driven decision involving the authorizer’s board.</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). <p>March 2017 site visit: The SEA’s sponsor evaluation does not review the four areas of school planning and operations mentioned in the application. Reviewer Expertise and Protocols and Training are components of the sponsor evaluation; however, there was not sufficient evidence presented to verify these components met the level of expectations specified in the application.</p> <p>--</p> <p>December 2017 site visit: The grantee had clarified expectations for reviewer qualifications but had not included the accountability plan in their authorizer evaluation. The Sponsor Quality Rubric, regarding new charter school applications in B.02, addresses the educational plan, governance and management structures, and a business plan as stated in the SEA’s grant application. However, an accountability plan is not included in the Sponsor Quality Rubric.</p> <p>B.04 addresses Reviewer Expertise and asks for reviewers to possess knowledge in the four areas mentioned in the application: education plan, governance, finance, and accountability.</p>

Table 2.1C: QUALITY AUTHORIZING PRACTICES Authorizing and Monitoring.		
High quality authorizing and monitoring processes (as applicable based on content in approved grant application)	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>4) Authorizing processes that include differentiated review of charter petitions for charter developers with one or more high-quality charter schools.</p> <p>The State’s application explained that the application and decision-making section of the sponsor evaluation establishes standards for authorizers in assessing petitions for new charter schools. Application requirements are expected to vary by type of applicant (existing charter operators, replicators, those seeking a different authorizer) in order to clearly capture the applicant’s history.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The SEA’s sponsor evaluation process includes a component for Rigorous Criteria for New Applicants, Including Any Affiliated with Previously Operating Schools. -- December 2017 site visit: No change was noted during the December 2017 visit; the grantee was implementing this element as proposed.

Sources: *March 2017* *Ohio Revised Code, Review of Community School Contracts*
December 2017 *Review of Community School Contracts and Operator Agreements, Ohio CSP Grant Comprehensive Plan, Request for Application-CSP, Sponsor Quality Practices Rubric, New Schools 2017-2018*

Indicator 2.2: FLEXIBILITY AND AUTONOMY. The SEA affords a high degree of flexibility and autonomy to charter schools.

Table 2.2: FLEXIBILITY AND AUTONOMY.		
Areas for charter school flexibility and autonomy.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Budget/Expenditures: According to the grant application, Ohio’s charter schools are “exempt from all state laws and rules pertaining to schools, school districts, and Boards of Education, except those laws and rules that grant certain rights to parents.”</p> <p>The application stated that charter schools have autonomy over their own budgets. There is clear statutory language mandating autonomy; the State directly funds charter schools; the schools monitor their own potential conflicts of interest; and the governing boards have authority to make autonomous decisions regarding budgets and expenditures.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: ORC 3314.01 (B) states that community schools are public schools that are independent of the school district. The Community Schools Act requires a bonded fiscal agent (3314.011); compliance with standards of financial reporting (3314.042); recognizes the community school as a LEA (3314.082); and receives payments directly from the department (3314.08).</p> <p>In Ohio, charter schools are exempt from following Operating Standards (Ohio Administrative Code 3301-35-01 – 15) and some State laws but, in general, charter schools follow most of the same laws as districts – with additional requirements specific to charter schools. In addition to statutes included in ORC 3314, ORC 3314.03 lists school district statutes that also apply to Ohio charter schools.</p> <p>In statute charter schools have autonomy over their budgets and expenditures; however, in practice conversion schools appear to have less autonomy. In a review of ten community school contracts there was evidence of the following requirements: 1) The school must use the sponsor’s financial services; 2) The school must use the district’s special education services; 3) The school must lease a district-owned property; and 4) The school must use a district employee as the school Superintendent. In addition, the financial autonomy of conversion community schools is in question when the</p>

Table 2.2: FLEXIBILITY AND AUTONOMY.

Areas for charter school flexibility and autonomy.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>sponsor’s board may appoint school board members, train these board members, and may assign district employees to the school, all of which were conditions that were found in the random sampling of community school contracts.</p> <p>--</p> <p>December 2017 site visit:</p> <p>This element was being implemented as necessary during the December 2017 site visit. Provisions are now in effect as a result of HB2 and ODE training for authorizers on contract provisions and have positively impacted community school flexibility and autonomy. While the SEA has limited authority to influence sponsor-community school contracts, SEA staff noted that when a sponsor is deficient in sponsoring expectations, they are notified and, if necessary, a corrective action plan is established. ODE has recently reviewed conversion school contracts to identify noncompliance provisions using the Internal Community School Contract Review Checklist 2016-2017. As flexibility and autonomy issues are identified by ODE, they are addressed on a case-by-case basis. These expectations are listed in the Comprehensive Plan on page 7.</p> <p>A random review of community school contracts revealed several schools have been closed since the March 2017 visit and none of the randomly reviewed contracts as a part of the December visit contained issues related to the flexibility and autonomy of community schools. All of the subgrantees visited indicated they had autonomy for their budgets and expenditures.</p>
<p>Personnel: The application stated that ORC 3314.04 exempts charter schools from all State laws and rules, except those delineated in the Community Schools Act. This means community schools are exempt from personnel</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>

Table 2.2: FLEXIBILITY AND AUTONOMY.

Areas for charter school flexibility and autonomy.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>laws and rules that pertain to all other public schools in the State.</p> <p><input type="checkbox"/> Not specified in application</p>		<p>March 2017 site visit:</p> <p>Although clear autonomy regarding personnel is detailed in statute, in a random review of ten community school contracts, the conversion school contracts stipulated provisions such as the governing authority needed to recognize the sponsor’s collective bargaining agreement and in at least one contract the school did not have any employees in their budget and were required to reimburse the district for employees. In addition, one contract required the school to use a school district staff member as the school’s Superintendent and the position reported to the sponsor’s Board of Education. The site visit team notes that conversion schools may not have sufficient flexibility and autonomy over personnel decisions.</p> <p>--</p> <p>December 2017 site visit:</p> <p>This element was being implemented as necessary during the December 2017 site visit. Since the last monitoring visit, ODE has explicitly communicated their expectations for authorizers to ensure flexibility and autonomy of personnel for their community schools, including conversion schools. ODE also reviewed contracts of schools that met certain conditions; for example, those that were established as a conversion school. This resulted in numerous authorizers being notified of noncompliance. Authorizers handled these notifications in a variety of ways including closure of the conversion school.</p> <p>A random review of community school contracts revealed many conversion schools had closed and none of the contracts reviewed as a part of the December visit contained flexibility and autonomy issues. Similarly, hiring decisions for personnel were controlled directly by each of the subgrantees visited.</p>

Table 2.2: FLEXIBILITY AND AUTONOMY.

Areas for charter school flexibility and autonomy.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Daily Operations: The application stated that charter schools are designated as LEAs; may acquire facilities; and have broad contracting authority to obtain all services necessary for the operation of a school as permitted under ORC 3314.01(B).</p>	<p>Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: In the SEA’s draft RFA, the applicant must describe the degree of flexibility and autonomy with which they operate, which is above and beyond that afforded to traditional public schools within the district.</p> <p>In a review of ten community school contracts, the site visit team notes there were provisions in conversion contracts requiring the schools to use sponsor fiscal and special education services. In addition, two contracts required the lease of sponsor-owned properties.</p> <p>--</p> <p>December 2017 site visit: This element was being implemented as necessary during the December 2017 site visit. Contracts randomly reviewed by the site visit team as a part of the December 2017 visit did not reveal issues with restricted community school daily operations autonomy. Likewise, no issues were found with this flexibility and autonomy among subgrantees.</p>

Sources: *March 2017* *Ohio Revised Code, Draft Ohio Department of Education, 2017 Public Charter School Program Planning & Implementation Grant RFA, Community School Contracts on the ODE Website, Community School Sponsor Websites*

December 2017 *Community School Contracts on the ODE Website, Community School Sponsor Agreements on the ODE Website, Internal Community School Contract Review Checklist 2016-2017*

Indicator 2.3: SUBGRANTEE QUALITY. The SEA awards grants to eligible applicants on the basis of the quality of the applications submitted.

Table 2.3: SUBGRANTEE QUALITY.		
SEA efforts to award grants on the basis of quality.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The SEA has criteria for subgrantee and application quality to assess CSP applicants and award subgrants: The application listed five competitive preference priorities: strategic replacement (10 points); high need location (8 points); educationally-disadvantaged students (5 points); proven educational models (5 points); and dropout prevention and recovery (3 points). Additionally, the application listed twelve planning grant application criteria and six implementation grant application criteria for planning grant recipients who wish to apply for continued funding.</p> <p>For each of these criteria, applications were to be scored reflecting categories similar to those used by the U.S. Department of Education: “Not Addressed,” “Poorly Developed,” “Adequately Developed,” “Well Developed,” and “Fully Developed”. These categories were associated with score points ranging from “0” for “Not Addressed” to “4” for “Fully Developed”.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The current draft RFA does not align with the competitive preference priorities outlined in the SEA’s grant application. Additionally, the draft rubric that the SEA intends to use to evaluate subgrant applications does not include the five competitive preference priorities stated in the application. The final criteria for evaluation and potential weighted components in the rubric were still undetermined at the time of the site visit.</p> <p>--</p> <p>December 2017 site visit: This element was being implemented as necessary during the December 2017 visit. The RFA included the competitive preference priorities (Section K of the application narrative) as stated in the application. There are criteria for evaluating these preference priority points in the associated rubric.</p> <p>OCS used this rubric in 2017 to evaluate subgrant applicants.. This rubric uses a zero to four-point scale. Sections and points for each section include executive summary (4); subgrant goals, budget narrative, and evaluation methods (24); school community (12); educationally disadvantaged students (16); educational model (20); school goals (16); outreach and engagement (12);</p>

Table 2.3: SUBGRANTEE QUALITY.

SEA efforts to award grants on the basis of quality.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>How the SEA uses these criteria to review and award CSP subgrant applications:</p> <p>As noted in the grant application, peer reviewers will be provided with an application evaluation rubric that will specify the criteria against which grants should be judged, and descriptors for awarding points for each criterion. Each application will be scored by three reviewers.</p> <p>According to the application, the State will use a peer review process to score applications and determine a minimum score for fundable applications. In addition, local community education organizations will advise ODE on grant awards.</p> <p>The application also stated the right to make awards that do not rely solely on points earned in the interest of meeting key geographic distribution objectives and to avoid any unintended concentrations of schools that could provide capacity in excess of need.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p>school personnel and external support (12); governance and management plan (12); and business capacity and continued operations (20).</p> <p>Nine subgrant applications were received from schools sponsored by two eligible sponsors. The rating system used is as proposed in the grant application.</p> <p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>There was a lack of consensus on the draft criteria and how these would be used to determine high-quality subgrant applications. A final tabulation of possible points and a cut score for funding was not finalized at the time of the visit. Furthermore, OCS staff did not have a plan for consulting with community organizations about subgrant awarding decisions, as proposed.</p> <p>--</p> <p>December 2017 site visit:</p> <p>This element was being implemented as necessary during the December 2017 visit. In addition to the peer review cited in its application, the SEA used a technical review process to review applications it received in May 2017. Technical reviewers included SEA personnel who used a checklist to determine the completeness of a school’s application and its eligibility to continue to the peer review process. The technical review process is detailed in two places, the State’s Comprehensive Plan and the Review and Award Process.</p>

Table 2.3: SUBGRANTEE QUALITY.

SEA efforts to award grants on the basis of quality.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The SEA demonstrates a high-quality process to determine the quality of the CSP applicant and application, including considering the review of the applicant during the charter authorization process (i.e. use of rubrics, hearings, rigor).</p> <p>Ohio will identify those authorizers that will be invited to work with developers on school applications for CSP. Only authorizers that are rated “exemplary” or “effective” under the State’s quality evaluation criteria will be invited to participate. A meeting of invited authorizers will be held at the beginning of the project to review the grant criteria described above and to explain the State’s objectives under the CSP program. Authorizers will be solicited regarding their needs for assistance during the process of identifying high-quality development projects and putting together high-quality proposals. ODE will provide assistance as appropriate and work collaboratively with authorizers to ensure a sufficient pool of strong proposals. Additionally, in partnership with NACSA, ODE will develop a series of tools and trainings that will be made available to</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>In the May 2017 subgrant competition, nine applications were received and three met the quality criteria and standards to pass the technical review. SEA staff noted that applicants who did not pass the technical review were able to explain their educational program but could not substantiate that their model would meet the needs of their targeted student population. The SEA plans further technical assistance for schools not passing the technical review of their subgrant applications.</p> <p>There were nine subgrant applications submitted in 2017 and only three passed the technical review and underwent a peer review. All three of these subgrants were funded.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Under the evaluation system required by HB2, sponsors received a rating in the Fall of 2016. These ratings were lower than expected with none of the sponsors scoring Exemplary, 5 rated Effective, 39 rated Ineffective, and 21 of the sponsors rated Poor. As proposed, only developers working with sponsors rated Exemplary or Effective will be invited to submit subgrant applications. OCS did not articulate a plan for collaborating with authorizers to ensure a pool of strong applicant proposals and at the time of the visit did not have plans to develop a series of tools or trainings to provide best practices and professional development throughout Ohio.</p> <p>--</p> <p>December 2017 site visit:</p>

Table 2.3: SUBGRANTEE QUALITY.

SEA efforts to award grants on the basis of quality.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>authorizers across the state. These materials and trainings will provide best practices and professional development throughout Ohio to ensure high-quality authorizing across the state, yielding high-performing charter schools.</p> <p><input type="checkbox"/> Not specified in application</p>		<p>This element was being implemented as proposed during the December 2017 visit. The SEA conducted a series of training workshops and webinars to convey expectations for subgrant applications. Qualifying sponsors and their charter schools were invited to this training. Training webinars were posted to the ODE website. Additionally, SEA staff noted that a quarterly meeting of sponsors, called the Sponsor Quality Network, is planned to enhance communication between sponsors and with ODE.</p>
<p>The State uses the Federal definition of <i>academically poor-performing charter school</i> or an alternative definition that is at least as rigorous and as noted in the approved grant application.</p> <p>In their application, the State committed to using the Federal definition for poor-performing charter schools for the CSP grant program.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The SEA revised its definition of academically poor-performing charter school to align with recent legislative changes in State law. Ohio law now defines a poor-performing charter school as a school receiving a D or F on the performance index score and a score of D or F for the value-added progress dimension, on the most recent report card (Ohio Revised Code 3314.034). This modification was approved by ED.</p> <p>--</p> <p>December 2017 site visit: This element was still being implemented as necessary during the December 2017 visit; no changes were noted.</p>
<p>The State uses the Federal definition of <i>high-quality charter school</i> or an alternative definition that is at least as rigorous and as noted in the approved grant application.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>

Table 2.3: SUBGRANTEE QUALITY.

SEA efforts to award grants on the basis of quality.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The State’s application committed to using the Federal definition for high-quality charter schools in the CSP subgrant program.</p> <p><input type="checkbox"/> Not specified in application</p>		<p>March 2017 site visit:</p> <p>For the purposes of this grant, ODE is using the same definition for a high-performing community school that it is using as part of the SEA’s charter classroom facilities grant program, offered through the Ohio Facilities Construction Commission (ORC 501.10). This modification was approved by ED.</p> <p>The SEA’s definition for high-performing is:</p> <ol style="list-style-type: none"> 1. If the charter school is a dropout prevention and recovery model, its rating should be “Overall Exceeds Standards” rating. 2. If the charter school serves any combination of 9-12 grades the Four-Year Graduation Rate must meet the equivalent of A or B and the Performance Index must meet either the equivalent of A, B, or C or must have increased for the previous three years of operation. 3. If the charter school serves any combination of 4-8 grades, the overall value-added measure must meet the equivalent of A or B and the Performance Index must meet either the equivalent of A, B, or C or must have increased for the previous three years of operation. 4. If the charter school serves only a combination of K-3 grades, the K-3 Literary measure must meet the equivalent of A or B. <p>The site visit team notes that the SEA does not currently use its definition of high-quality charter school for the purposes of this grant.</p> <p>--</p>

Table 2.3: SUBGRANTEE QUALITY.

SEA efforts to award grants on the basis of quality.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>December 2017 site visit: This element had been addressed and was being implemented as necessary during the December 2017 visit. The April 2017 edition of the Request for Application-Ohio, on page 5, includes the definition for a high-performing community school. This includes:</p> <ol style="list-style-type: none"> 1. If the community school serves any combination of ninth through 12th grades, the Four-Year Graduation Rate must meet the equivalent of A or B and the Performance Index must meet either the equivalent of A, B or C or must have increased for the previous three years of operation. 2. If the community school serves any combination of fourth through eighth grades, the overall value-added measure must meet the equivalent of A or B and the Performance Index must meet either the equivalent of A, B or C or must have increased for the previous three years of operation. 3. 3. If the community school serves only a combination of kindergarten through third grades, the K-3 Literacy measure must meet the equivalent of A or B.

Sources: *March 2017 Ohio Revised Code; Community School Contracts on the ODE Website; ODE Letter to U.S. Department of Education dated November 18, 2015*
December 2017 Community School Contracts on the ODE Website, Ohio CSP Grant Comprehensive Plan, Request for Application-CSP

Table 2.3: SUBGRANTEE QUALITY Use and monitoring of definitions of academically poor performing and high quality charter schools.

Usage and monitoring of definitions for <i>academically poor performing</i> and <i>high quality charter schools</i> .	Provide detailed narrative about the grantee’s current approach.
<p>How and for what purposes does the State use the definition of academically poor-performing charter school?</p>	<p>March 2017 site visit: If a charter applicant has performed poorly, the applicant would not be eligible for replication. Additionally, poor-performing community schools must obtain approval from ODE before changing sponsors and the definition is used for the SEA’s automatic closure law.</p> <p>--</p> <p>December 2017 site visit: No change was noted during the December 2017 visit; the definition of academically poor-performing charter school was still being used in the same way.</p>
<p>How and for what purposes does the State use the definition of high-quality charter school?</p>	<p>March 2017 site visit: There was no indication from the interviews with ODE staff that the definition was operationalized.</p> <p>--</p> <p>December 2017 site visit: The SEA now uses a technical review process that includes a checklist tool to document whether an applicant has met certain criteria, including eleven eligibility criteria, one of which is if the applicant is planning or implementing a high-performing community school. The 2017 technical review process eliminated six of nine CSP subgrant applicants due to their inability to demonstrate the school would be a high-performing school with a track record of high-quality performance.</p>
<p>How does the State monitor subgrantees and other charter schools to determine whether they are academically poor-performing or high-quality?</p>	<p>March 2017 site visit: The SEA intends to use performance on the school report cards to determine whether schools are high-quality or academically poor-performing. Otherwise, the SEA’s programmatic monitoring is not developed at this time.</p> <p>--</p> <p>December 2017 site visit: The SEA’s new monitoring tool includes indicators for monitoring Indicators of Quality, including Quality Board Membership, Effective Board Functioning, Effective System of Leadership, Effective Professional Development, Culture of High Expectations, and Data Driven Decision Making. In addition, in D.05 Performance Monitoring of the Sponsor Quality Rubric, sponsors are required to regularly monitor their schools’ academic performance. Sponsors that do not meet this requirement are notified via certified mail and put on a corrective action plan.</p>

Sources: *March 2017* *ODE Letter to U.S. Department of Education dated November 18, 2015*
 December 2017 *Sponsor Quality Rubric*

Indicator 2.4: PLAN TO SUPPORT EDUCATIONALLY DISADVANTAGED STUDENTS. The State is supporting educationally-disadvantaged students as noted in the approved grant application.

Table 2.4: EDUCATIONALLY DISADVANTAGED STUDENTS		
Quality of the plan to support educationally disadvantaged students.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The SEA’s charter school program assists students, particularly educationally disadvantaged students, in meeting and exceeding State standards and reduces or eliminates achievement gaps for educationally disadvantaged students.</p> <p>ODE will assist disadvantaged students in meeting and exceeding State standards through the AQPR’s emphasis on high-quality authorizing, which is expected to drive to the development of more high-quality schools. ODE will also serve educationally disadvantaged students by increasing the number of high-quality schools and effective seats where they are most needed, primarily in the Ohio 8 districts, an alliance comprised of the Superintendents and Teacher Union Presidents from Ohio’s eight urban school districts (Akron, Canton, Cincinnati, Cleveland, Columbus, Dayton, Toledo, and Youngstown).</p> <p>CSP subgrantees will be held accountable for their results in reducing or eliminating achievement gaps through measures (annual measurable objectives) reported on the Local Report Card. Additionally, the Office of Quality School Choice (OQSC) will conduct a study of best practices for reducing achievement gaps and disseminate findings from the study to subgrantees</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).
		<p>March 2017 site visit: As proposed in the grant application, ODE is encouraging high-quality authorizing through its sponsor evaluation process. At the time of the site visit, five authorizers were rated Exemplary or Effective and developers with agreements with those authorizers will be eligible to apply for CSP subgrants. It remains to be seen if the sponsor evaluation process will assist educationally-disadvantaged students in meeting and exceeding State standards or if the CSP subgrant program will increase the number of high-quality schools and effective seats.</p> <p>Ohio’s school report cards contain a component for Gap Closing. These data are monitored and reported each year for all public schools, including community schools.</p> <p>The SEA’s focus for disseminating best or promising practices has been on strategies and techniques to improve its lowest-performing schools, in the Ohio 8 districts. Aligning with this focus and using the SEA’s rubric, ODE will study subgrantee schools that are closing the achievement gap and distribute these findings along with all public schools.</p>

Table 2.4: EDUCATIONALLY DISADVANTAGED STUDENTS

Quality of the plan to support educationally disadvantaged students.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>including technical assistance, as needed, to support schools in the implementation of best practices.</p> <p>Ohio’s strategies for reducing or eliminating achievement gaps are shown in several actions: the Ohio Improvement Process; funding changes (e.g. facility funds) which make additional resources available; and early learning and career and college readiness strategies, which drive academic improvement and close achievement gaps.</p> <p><input type="checkbox"/> Not specified in application</p>		<p>ODE utilizes a statewide school improvement process that will also be used by community schools. An emphasis within this work is to improve high schools, also a priority for OCS. Community schools were included in the new Ohio Facilities Construction Commission, effective April 6, 2017.</p> <p>Most CSP grant materials have not yet been developed. There are priority points in the draft RFA for serving educationally-disadvantaged students, but how these priority points will be applied in the grant review process has not been determined. There was not a specific plan for how the CSP grant would impact student achievement for educationally-disadvantaged students.</p> <p>--</p> <p>December 2017 site visit: This element was being implemented as proposed during the December 2017 visit. The RFA includes optional Competitive Preference Points that place an emphasis on schools serving educationally or socioeconomically disadvantaged students in the State’s most challenged urban communities. Competitive Preference Points are awarded for Strategic Replacement (up to 10 points); High Need Location (up to 8 points); Educationally Disadvantaged Students (up to 5 points); and Proven Educational Model (up to 5 points).</p> <p>In addition, other components of the RFA, such as Educational Model, School Goals, and a Plan for Educationally Disadvantaged Students, address high-performing schools.</p>
<p>The SEA has a plan to ensure that charter schools attract, recruit, admit, enroll, serve, and retain educationally disadvantaged students equitably and in a manner consistent with IDEA and civil rights laws, as applicable.</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>

Table 2.4: EDUCATIONALLY DISADVANTAGED STUDENTS

Quality of the plan to support educationally disadvantaged students.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The Department’s notice of grant opportunity will require applicants to build into their proposals a plan for recruiting, enrolling, and retaining disadvantaged students. In their plans, applicants will be asked to explain how they expect to engage diverse populations during initial enrollment drives and throughout the grant period. Community outreach efforts will be consistent with Ohio statute and will describe promising practices for reaching underrepresented student populations and their families. Such practices may include orientations, mailings, and partnerships with community leaders and organizations.</p> <p>In a manner consistent with ODE’s plans to disseminate best practices for reducing achievement gaps, OQSC will disseminate best practices for recruiting, enrolling, serving, and retaining disadvantaged students, including practices employed by subgrantees.</p> <p><input type="checkbox"/> Not specified in application</p>		<p>March 2017 site visit:</p> <p>The SEA’s draft notice of grant opportunity notifies applicants that the grant program prioritizes serving students who are educationally or socioeconomically disadvantaged. The notice does not explain that the applicant will need to submit a plan for community outreach efforts nor does it say that promising practices for recruitment should be used by the applicant.</p> <p>During interviews with the site visit team, ODE did not articulate a plan for OCS to disseminate best practices for recruiting, enrolling, serving, or retaining educationally-disadvantaged students.</p> <p>--</p> <p>December 2017 site visit:</p> <p>The SEA has implemented its plan to require subgrant applicants to describe how it will recruit, serve, and retain educationally disadvantaged students as part of the RFA. However, applicant responses to these required elements were not complete enough to allow ODE to assess the quality of applicants’ plans and their ability to meet the needs of this student population.</p> <p>The State’s RFA includes a prompt that asks the applicant to describe how outreach has been made to potential families, and specifically asks about outreach to educationally disadvantaged student populations.</p> <p>Section D: Educationally Disadvantaged Students of the RFA asks the applicant to explain its plans for recruiting, serving, and retaining educationally disadvantaged students. The site visit team’s review of subgrant applications identified that applicants’ responses to this section were superficial. They did not mention specific staff, a connection to the school budget, how full-time and/or itinerant staff would serve students, what staff</p>

Table 2.4: EDUCATIONALLY DISADVANTAGED STUDENTS

Quality of the plan to support educationally disadvantaged students.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>The SEA encourages innovation in charter schools that are designed to improve the academic achievement of educationally disadvantaged students.</p> <p>As noted in the grant application, clear, comprehensive plans for innovation, designed to improve achievement for disadvantaged students, will be encouraged of every applicant. Ohio plans to award subgrants to applicants with a strong sense of best practices in charter school innovation, and how those innovations will meet the learning needs of targeted populations. One of the criteria used to evaluate CSP grant applications will be the innovativeness of the academic plan.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>position had ultimate responsibility for servicing students with special needs, how student achievement data would inform decision-making, or other details that would clearly identify how applicants planned to operationalize these services effectively.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The draft RFA does not include plans for awarding subgrants based on innovativeness. Applicants are asked to explain the effectiveness of their proposed educational program, but not the program’s innovativeness.</p> <p>State staff articulated that by improving sponsor quality, they hope to attract high-quality schools that have been proven to be successful in other states. They believe a high-quality sponsoring environment will encourage operators to thrive, thereby increasing innovation.</p> <p>--</p> <p>December 2017 site visit: This element was being implemented as proposed during the December 2017 visit. The State’s RFA included a prompt for the applicant to address how innovative programs, interventions, and/or plans to support all populations of educationally disadvantaged students will be addressed.</p>
<p>The SEA has a plan to monitor all charter schools to ensure compliance with Federal and State laws, particularly laws related to educational equity,</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p>

Table 2.4: EDUCATIONALLY DISADVANTAGED STUDENTS

Quality of the plan to support educationally disadvantaged students.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>nondiscrimination, and access to public schools for educationally disadvantaged students.</p> <p>OQSC uses a CSP Grant Site Monitoring Form that includes performance objectives, action steps and benchmarks described in the subgrant application. Evidence, ratings, and actions needed are documented for each item. ODE will monitor compliance quarterly to ensure that applicable Federal requirements and performance goals are being met and that the expenditure of Federal funds is in accord with all applicable laws and regulations. Programmatic goals will also be reviewed to confirm that they have or are in the process of achieving objectives and are adhering to the program’s governing assurances.</p> <p>During the monitoring process, if a Corrective Action Plan (CAP) is required, OQSC continues monitoring activities to ensure that the school has successfully implemented the CAP. Failure to cooperate with OQSC’s monitoring efforts will result in early termination of the subgrantee’s award, including the return of any previously distributed funds.</p> <p>The previously mentioned CCIP is a unified grants application and verification system that consists of two parts: the Planning Tool and the Funding Application. It will be used to monitor subgrantees’ compliance by tracking goals, strategies, action steps, district goal amounts for all grants, budgets, budget details, and other related pages. Subgrantee applications are filed electronically in CCIP, with all steps in the review and</p>		<p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: At the time of the site visit, the grantee’s draft monitoring protocol did not include plans to ensure compliance with Federal and State laws related to educational equity, nondiscrimination, and access to public schools for educationally-disadvantaged students.</p> <p>Sponsors are rated each year on three primary areas, which includes compliance with Federal and State laws. However, there was no plan in place to monitor compliance directly for CSP grant-funded schools.</p> <p>--</p> <p>December 2017 site visit: The State has monitoring protocols developed but they do not explicitly address educational equity, nondiscrimination, and access to public schools for educationally disadvantaged students. Similarly, the Sponsor Quality Practices Rubric does not explicitly address compliance in these areas. Other program offices at the State provide monitoring for some Federal and State laws, but evidence was not provided that this monitoring adequately ensures compliance with educational equity and nondiscrimination laws.</p> <p>The State has Grant Monitoring Rubrics and conducts a Fall desk review and a Spring onsite visit for all subgrantees. This is in addition to standard monitoring through CCIP and the Grants Fiscal Office. The monitoring tool includes indicators in the categories of: program compliance, fiscal compliance, grant implementation, performance on goals and objectives, and quality practices (implementation rubric only). There is no indicator in the monitoring tool that explicitly addresses educational equity,</p>

Table 2.4: EDUCATIONALLY DISADVANTAGED STUDENTS

Quality of the plan to support educationally disadvantaged students.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>approval process documented. Any subgrantee that fails to adhere to their approved plans in the CCIP could face corrective action from ODE, up to and including the revocation and repayment of grant funds.</p> <p><input type="checkbox"/> Not specified in application</p>		<p>nondiscrimination, and access to public schools for educationally disadvantaged students.</p> <p>Compliance with some Federal and State laws are monitored directly by the State through State accountability, financial, and other programs. The State still indicated they plan to use a Corrective Action Plan if an issue is identified at any point during the monitoring process.</p> <p>The Grant Monitoring Rubric also includes an indicator that addresses a school’s compliance with the preliminary agreement and/or charter contract with its sponsor. The State relies on the school’s sponsor to ensure compliance with Federal and State laws, which are delineated in most charter contracts, and the State expects sponsors to ensure compliance during their onsite monitoring visits. However, the Sponsor Quality Practices Rubric by which the State assesses sponsors does not address sponsor oversight of compliance with Federal and State laws for educational equity, nondiscrimination, and access to public schools.</p>

Sources: *March 2017 Ohio Revised Code*
December 2017 Request for Applications-CSP, CSP Grant Monitoring Rubric

Indicator 2.5: SUBGRANTEE MONITORING. The SEA monitors subgrantee projects to assure approved grant and subgrant objectives are being achieved.

Table 2.5: SUBGRANTEE MONITORING.		
Elements of subgrantee monitoring.	Implementation Issue?	Detailed Information Describe components of subgrantee monitoring process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities
<p>Regularly monitor subgrantee projects (e.g., schedule for on-site and/or desk monitoring):</p> <p>As noted in the grant application, sponsors will conduct semi-annual reviews based on criteria and rubrics provided by ODE. These reviews will include the following components: compliance with State operational requirements; quality and success of academic program; quality and success of operational management; and quality, stability, and soundness of financial management.</p> <p>The application further notes that the State plans to conduct yearly reviews of authorizer monitoring, conduct multiple visits to each CSP subgrantee, and require each subgrantee to provide project goals and performance measures that align with the subgrantee’s objectives in opening the school.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>March 2017 site visit: ODE monitors charter school authorizers through its sponsor evaluation process, as proposed. That process ensures that authorizers are conducting semi-annual reviews of charter schools and reports are provided to the SEA.</p> <p>The draft monitoring protocol contains a list of items that will be reviewed during the SEA’s desk reviews and Fall and Spring onsite monitoring. Financial audit reports will be reviewed annually. Each subgrant recipient will be considered high-risk and therefore monitored onsite twice a year. However, no monitoring schedule was proposed for desk reviews.</p> <p>--</p> <p>December 2017 site visit: The grantee was implementing this element as proposed during the December 2017 visit. The SEA has a monitoring rubric that it will use for Fall desk and Spring onsite reviews. At the time of the December 2017 visit, subgrantees had submitted the requested documentation needed for the desk review, but it had not been reviewed yet. The first onsite visits are planned for Spring 2018.</p> <p>ODE has defined a comprehensive monitoring plan that includes annual monitoring of all subgrantee schools each year they are receiving CSP funds. Monitoring visits will be conducted using the CSP Subgrant Monitoring Rubric.</p>
<input type="checkbox"/> Not specified in application		

Table 2.5: SUBGRANTEE MONITORING.

Elements of subgrantee monitoring.	Implementation Issue?	Detailed Information Describe components of subgrantee monitoring process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities
<p>Select subgrantees to be monitored using a risk-based or other strategic approach in accordance with monitoring plan:</p> <p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Not specified in application</p>		<p>March 2017 site visit:</p> <p>The grants fiscal management system provides a sophisticated risk-based analysis. The electronic system uses multiple components to analyze risk and make recommendations for monitoring.</p> <p>It is anticipated that while the SEA’s CSP grant is considered High Risk, all CSP subgrantees will be monitored each year. Monitoring will include both fiscal and program staff. The monitoring tool and related policy have not been created by program staff.</p> <p>--</p> <p>December 2017 site visit:</p> <p>The grantee continued to have access to the risk-assessment system as described from the March 2017 visit. Additionally, the grantee was in the process of monitoring all subgrantees as described above. The SEA had developed a monitoring plan that utilizes both program and fiscal staff.</p>
<p>Use trained monitors to monitor subgrantee projects in accordance with monitoring plan:</p> <p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Not specified in application</p>		<p>March 2017 site visit:</p> <p>State staff reports that Grants Fiscal Management will have one designated staff member participate in all CSP subgrantee monitoring reviews and visits. The SEA plans for fiscal and program staff, working together on all monitoring, to train each other with their respective expertise. Program staff has not yet been determined. The monitoring plan, on the program side of the department, has not been developed and the components for monitoring training are not determined.</p> <p>--</p> <p>December 2017 site visit:</p> <p>At the time of the December 2017 visit, a formal plan was not in place to train monitors, and monitoring was to be conducted by staff new to CSP. The new CSP Grants Manager and a new Grants Fiscal Management staff member were tasked with carrying out CSP subgrantee monitoring. There was no written plan for training staff to conduct monitoring visits. In the short term, ODE staff that previously worked with the CSP program will remain involved to provide mentoring and guidance to staff conducting the monitoring visits.</p>

Table 2.5: SUBGRANTEE MONITORING.

Elements of subgrantee monitoring.	Implementation Issue?	Detailed Information Describe components of subgrantee monitoring process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities
<p>Systematic monitoring processes align with monitoring plan and allow the SEA to assess a subgrantee’s progress in meeting the performance objectives and other programmatic components outlined in subgrant applications:</p> <p>The application stated that ODE will require each subgrantee to provide project goals and performance measures that align with the subgrantee’s objectives in opening the school. ODE will evaluate these goals annually by requiring an annual report from the subgrantee. Inability to meet or exceed goals and performance measures will be taken into account when the subgrantee applies for the next year’s funding.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>March 2017 site visit: At the time of the site visit, the grantee had developed a draft monitoring protocol. The protocol included a plan to assess each subgrantee’s progress in meeting its project goals and objectives by verifying data collected to determine progress. The draft includes plans to verify sponsor eligibility prior to and during the subgrant period; monitor and ensure compliance of the subgrantee during the project period; and enforce any Corrective Action Plans that may be developed during Fall and Spring site visits.</p> <p>State fiscal management includes a statewide electronic grants management system with myriad features such as a monitoring dashboard, history log, document repository, communication tool, and compliance monitor. Information for the CSP grant must be supplied by program staff and had not been done at the time of the visit. Although the electronic system is comprehensive, its effectiveness is largely dependent upon program staff to input information needed to monitor subrecipients. Although some programmatic evidence was provided for planned monitoring, it was not fully developed.</p> <p>--</p> <p>December 2017 site visit: At the time of the December visit, the grantee was implementing this element as necessary. The CSP Grant Monitoring Rubric includes a section for Progress on Project Goals in which the SEA monitors the school’s implementation of project goals. There is also a section for Grant Implementation that evaluates the implementation of plans submitted with the subgrant application.</p> <p>Subgrantee schools submit requested documentation to the State in CCIP and the monitoring tool includes a list of documents that should be submitted. The SEA has indicated a plan to allow for greater usability across grant programs within CCIP that would reduce the paperwork burden on CSP subgrantees.</p>

Table 2.5: SUBGRANTEE MONITORING.

Elements of subgrantee monitoring.	Implementation Issue?	Detailed Information Describe components of subgrantee monitoring process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities
<p>Systematic monitoring processes align with monitoring plan and allow it to assess a subgrantee’s fiscal control and fund accounting procedures (including program requirements and allowable costs):</p> <p>The State’s CCIP system is an electronic unified grants application and verification system that consists of a Planning Tool and the Funding Application. It will be used to track goals, strategies, action steps, district goal amounts for all grants, budgets, budget details, and other related information. Any subgrantee that fails to adhere to their approved plans in CCIP could face corrective action from ODE, up to and including the revocation and repayment of grant funds.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>March 2017 site visit: The SEA uses a sophisticated, electronic grants management system with experienced staff that created and continue to use the system. This system, CCIP, is used for all State grants. CCIP utilizes numerous mechanisms to ensure quality fiscal control and ensure grants fiscal compliance.</p> <p>Despite the advantages of the CCIP system, the site visit team notes the lack of staff with CCIP expertise within OCS at the time of the visit. This poses a risk that information about CSP program requirements and allowable costs may not be effectively managed and communicated to fiscal staff through CCIP.</p> <p>--</p> <p>December 2017 site visit: Fiscal monitoring practices were being implemented as proposed during the December 2017 visit. The CSP Grant Program Monitoring Rubric contains a section on Fiscal Indicators in which policies such as conflict of interest, procurement, inventory control, and budget management policies are reviewed. School policies are uploaded for the desk review monitoring.</p> <p>Communication across the SEA has improved with the development of the Ohio CSP Grant Comprehensive Plan, in which various department staff worked collaboratively to document the process for CSP grant operations across departments. This, along with new staff members assigned to the CSP grant, have improved grant management.</p>
<p>Monitoring processes include formal follow-up or corrective action plans for identified deficiencies:</p> <p>According to the application, the State intended to follow-up with monitoring findings via two routes: 1) For issues</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>March 2017 site visit: As proposed, ODE plans to rely on the community school’s sponsor to rectify compliance issues that may arise. This plan assumes the SEA and the sponsors have the capacity and appropriate staff needed to promptly identify these deficiencies and ensure issues are addressed in a timely manner. Program staff, not grants fiscal staff, would have the primary responsibility to ensure corrective action plans are addressed and monitored by</p>

Table 2.5: SUBGRANTEE MONITORING.

Elements of subgrantee monitoring.	Implementation Issue?	Detailed Information Describe components of subgrantee monitoring process. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities
<p>identified by the authorizer, the authorizer will work with the school to either immediately rectify the compliance issue or to develop a corrective action plan that will lead to compliance in an expeditious manner; and 2) For issues identified through CSP subgrant monitoring, ODE will communicate with the authorizer in a similar process to rectify or create a corrective action plan. When a corrective action plan has been put into place, the State’s future monitoring activity will include a review of the corrective action plan commitments. Schools will know that extended non-compliance will lead to termination of their charter.</p>		<p>the sponsors and schools. At the time of the visit, there were issues about the availability of appropriate staff and their capacity to assume these responsibilities with fidelity.</p> <p>--</p> <p>December 2017 site visit:</p> <p>During the December 2017 visit, ODE continued to plan to rely on sponsor to rectify compliance issues identified. Additionally, ODE had developed a monitoring tool that communicates its expectations for subgrantee performance and explains the monitoring process. Schools have been provided the monitoring protocol and at the time of the visit, had submitted requested documentation. ODE staff reported already providing technical assistance to subgrantees as subgrantees prepared for the first desk review.</p> <p>The monitoring rubric contains a requirement for a corrective action plan if a subgrantee is not in compliance with reporting requirements. The grantee is hopeful that new staff and staff newly assigned to the CSP grant will positively impact the monitoring process, including following up on deficiencies through corrective action plans or through technical assistance.</p>

Not specified in application

Sources: *March 2017 Ohio Revised Code, Subgrantee Monitoring Protocol DRAFT*
December 2017 Ohio CSP Comprehensive Plan, Request for Applications-CSP, Sponsor Quality Practices Rubric, CSP Subgrant Monitoring Rubric

Indicator 2.6: DISSEMINATION OF INFORMATION AND BEST PRACTICES. The State disseminates best or promising practices of charter schools to each local educational agency in the State (as applicable).

Table 2.6: DISSEMINATION OF BEST OR PROMISING PRACTICES.		
Elements of dissemination of best or promising practices.	Implementation Issue?	Detailed Information Describe components of dissemination subgrants. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Dissemination subgrants		
<p>Utilization of dissemination subgrants to identify and disseminate best or promising practices of charter schools to each LEA in the State:</p> <p><input checked="" type="checkbox"/> Not applicable. The State is not issuing dissemination subgrants.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input checked="" type="checkbox"/> Not applicable</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p>
Dissemination of information and best practices strategy:		
<p>Identification and selection of best or promising practices (including use of dissemination subgrants and other efforts, as applicable):</p> <p>The application stated that the State will form and regularly convene a Charter School Promising Practices Dissemination Network, which will be led by ODE staff and coordinated by a steering committee. The steering committee will determine the “seal of approval” for best or promising practices from charter schools.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>There is a plan to use the SEA’s definition of “best or promising” practices and dissemination information collected through the department’s school improvement efforts. Statewide best and promising practices conferences are planned for November 2017 and Summer 2018 and will be advertised through the department’s typical statewide network. The results of sponsor evaluations will inform which community school practices should be highlighted for dissemination.</p> <p>--</p>

Table 2.6: DISSEMINATION OF BEST OR PROMISING PRACTICES.

Elements of dissemination of best or promising practices.	Implementation Issue?	Detailed Information Describe components of dissemination subgrants. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>December 2017 site visit:</p> <p>There is now a database of statewide performance data and a desire to use this data to identify best practices in content area and grade level. These data will inform decisions on where additional technical assistance is needed.</p> <p>The School Improvement Institute will now include OCS in planning future conferences and there will be expanded outreach.</p> <p>Community schools can affiliate with one of sixteen local Education Service Centers that identify best or promising practices in all public schools with a shift toward evidence-based practices.</p>
<p>Dissemination of best or promising practices of charter schools to each LEA in the State (including dissemination subgrants and other efforts, as applicable):</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
<p>The application detailed a dissemination plan for charter school best or promising practices. This plan provides further detail for the proposed steering committee previously mentioned. Special topics such as discipline, school climate, and racial and ethnic diversity were specified in the plan.</p>		<p>March 2017 site visit:</p> <p>The SEA plans to disseminate best or promising practices statewide for all public schools. The steering committee, with representatives from LEAs that sponsor community schools, will oversee dissemination of best or promising practices to LEAs, as proposed. The research and resources designated for dissemination will be housed in the SEA’s online resource center and the already-established network of Education Service Centers will be used to disseminate these best or promising practices. In addition, webinars and conferences, for which LEAs are already networked, will be used to disseminate practices.</p>
<p><input type="checkbox"/> Not specified in application</p>		<p>--</p>

Table 2.6: DISSEMINATION OF BEST OR PROMISING PRACTICES.

Elements of dissemination of best or promising practices.	Implementation Issue?	Detailed Information Describe components of dissemination subgrants. Add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Ability to ensure that disseminated information reaches all LEAs in the State:</p> <p>The application explained that the State will identify and disseminate promising practices in a host of relevant educational and operational areas, paying particular attention to identifying promising practices relative to racial and ethnic diversity. In addition, the State will leverage the Ohio Education Research Center. The application stated that a detailed dissemination plan will be developed in the future.</p> <p><input type="checkbox"/> Not specified in application</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p>December 2017 site visit:</p> <p>Community schools are fully integrated in the State system for disseminating best or promising practices. Education Service Centers continue to play the predominant role in distributing these best or promising practices to schools. For example, a community school Principal presented at the statewide conference, the School Improvement Institute.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>The SEA plans to use: 1) It’s Ohio Educational Research Center to further refine data analysis, 2) The steering committee to develop a detailed dissemination plan, 3) Webinars and conferences already used by the SEA for all its public schools, and 4) Further identify practices through the CSP grant program.</p> <p>--</p> <p>December 2017 site visit:</p> <p>There was no change from the previous monitoring visit; this element was still being implemented as proposed.</p>

Sources: *March 2017 N/A*
December 2017 Community School Principal Presentation

Indicator 2.7: ASSESSMENT OF PERFORMANCE MEASURE DATA. The State demonstrates appropriate data collection and interpretation strategies to meet its application objectives.

Table 2.7: ASSESSMENT OF PERFORMANCE MEASURES DATA.		
Objective 1: (Problem Identification and Grant Setup) Provide high quality educational options to Ohio’s most disadvantaged students by stimulating the creation of high quality applications for the creation of new schools.		
Performance Measure	Performance Measure Data Review	Notes
<p>Performance Measure 1: The percentage of charter schools, opened prior to July 1, 2016, that are identified as poor performing</p> <p>--</p>	<p><input type="checkbox"/> No concerns with data quality or performance measure interpretation</p> <p><input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain)</p> <p><input type="checkbox"/> Unable to assess (explain)</p>	<p>March 2017 site visit*: This metric is included in the SEA’s annual performance report and school report cards. These data are confirmed by the SEA’s Data Governance Committee prior to release.</p>
<p>Percentage of community schools meeting or exceeding the standard of a combined score of B on all applicable graded measures:</p> <ul style="list-style-type: none"> • Value-Added (Overall, VA for Lowest 20%, VA for Students with Disabilities, and VA for Gifted) • Performance Index • Indicators Met • Annual Measurable Objectives (AMO) • K-3 Literacy Improvement • 4-year Graduation Rate • 5-year Graduation Rate • Prepared for Success <p><i>Target: 80% of schools meet the standard on the overall performance component score or make improvement</i></p>	<p>Data Quality/Interpretation Concerns:</p> <p><input type="checkbox"/> Inconsistent units of measure over time</p> <p><input type="checkbox"/> Data not aligned with performance measure</p> <p><input type="checkbox"/> Inconsistent wording of performance measure over time</p> <p><input type="checkbox"/> Incomplete or missing data</p> <p><input type="checkbox"/> Other (specify)</p>	<p><i>*At the time of the visit only a draft of these objectives and measures was available and the final was not yet approved.</i></p> <p>--</p> <p>December 2017 site visit**: During the December visit, it was noted that not all community schools will have a school report card due to State policy specifications. This missing data may impede the State’s ability to assess this measure going forward.</p> <p><i>**All performance measures were revised and approved by ED as of April 5, 2017. Updated measures are listed below the double dash in the left column.</i></p>

Table 2.7: ASSESSMENT OF PERFORMANCE MEASURES DATA.

Objective 1: (Problem Identification and Grant Setup) Provide high quality educational options to Ohio’s most disadvantaged students by stimulating the creation of high quality applications for the creation of new schools.

Performance Measure	Performance Measure Data Review	Notes
<p>Performance Measure 2: The percentage of applications received that earn 75% or more total points on the application evaluation rubric.</p>	<p><input checked="" type="checkbox"/> No concerns with data quality or performance measure interpretation <input type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain)</p>	<p>March 2017 site visit: The application evaluation rubric has not been finalized. --</p>
<p>--</p> <p>The percentage of applications (planning and implementation) received from eligible participants that earn 75% or more total points on the application evaluation rubric</p> <p>Target: 80% of applications received 75% or more total points on the application evaluation rubric</p>	<p>Data Quality/Interpretation Concerns: <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)</p>	<p>December 2017 site visit: All three funded subgrant applications scored 75% or above and will be reported in the next APR. Individual scores were 78, 88, and 93%.</p>
<p>Performance Measure 3: The percentage of eligible proposed schools awarded a CSP planning subgrant that earn 75% or more total points on the plan evaluation rubric that measures successful planning activities.</p> <p>--</p> <p>Target: 90% of awarded subgrantees earn 75% or more total points on the plan [sic] evaluation rubric</p>	<p><input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain)</p> <p>Data Quality/Interpretation Concerns: <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)</p>	<p>March 2017 site visit: The evaluation rubric to measure successful planning activities has not been finalized. --</p> <p>December 2017 site visit: This measure is not applicable yet. All subgrantee applications were for implementation grants this year.</p>

Table 2.7: ASSESSMENT OF PERFORMANCE MEASURES DATA.

Objective 1: (Problem Identification and Grant Setup) Provide high quality educational options to Ohio’s most disadvantaged students by stimulating the creation of high quality applications for the creation of new schools.

Performance Measure	Performance Measure Data Review	Notes
<p>Performance Measure 4: Percentage of schools opened with CSP subgrant funds that are located in priority geographic areas and/or serving economically disadvantaged students</p> <p>--</p> <p>Target: 90% of the schools opened with CSP funds are located in priority geographic areas and/or serving economically disadvantaged students</p>	<p><input checked="" type="checkbox"/> No concerns with data quality or performance measure interpretation</p> <p><input type="checkbox"/> Performance measure not applicable at time of site visit (explain)</p> <p><input type="checkbox"/> Unable to assess (explain)</p> <p>Data Quality/Interpretation Concerns:</p> <p><input type="checkbox"/> Inconsistent units of measure over time</p> <p><input type="checkbox"/> Data not aligned with performance measure</p> <p><input type="checkbox"/> Inconsistent wording of performance measure over time</p> <p><input type="checkbox"/> Incomplete or missing data</p> <p><input type="checkbox"/> Other (Specify)</p>	<p>March 2017 site visit:</p> <p>No schools have been awarded a subgrant at this time. However, this metric aligns with the SEA’s planned competitive preference priorities for its subgrant program, as proposed. This is defined as a “high needs location.”</p> <p>--</p> <p>December 2017 site visit:</p> <p>This year’s funded subgrantee applications were from Columbus and Cincinnati, both high needs locations.</p>
<p>Performance Measure 5: Percentage of students attending schools opened with CSP subgrant funds (planning and implementation) that are identified as economically disadvantaged or a racial minority</p> <p>--</p> <p>Target: 100% of the schools opened with CSP subgrant funds maintain a 60% or higher population of students who have been identified as economically disadvantaged or a racial minority.</p>	<p><input type="checkbox"/> No concerns with data quality or performance measure interpretation</p> <p><input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain)</p> <p><input type="checkbox"/> Unable to assess (explain)</p> <p>Data Quality/Interpretation Concerns:</p> <p><input type="checkbox"/> Inconsistent units of measure over time</p> <p><input type="checkbox"/> Data not aligned with performance measure</p> <p><input type="checkbox"/> Inconsistent wording of performance measure over time</p> <p><input type="checkbox"/> Incomplete or missing data</p> <p><input type="checkbox"/> Other (Specify)</p>	<p>March 2017 site visit:</p> <p>The data in this performance measure are available through the SEA database.</p> <p>--</p> <p>December 2017 site visit:</p> <p>The window for collecting these data closes in January at which time baseline data will be reviewed.</p>

Sources: *March 2017 CSP Grant Performance Measures Draft 1-24-17*
December 2017 CSP Grant Performance Measures – Final 2017-04-05

Objective 2: (Operationalizing the Subgrants) Stimulate the creation of high performing charter schools that operate successfully under the CSP program utilizing quality practices

Performance Measure	Performance Measure Data Review	Notes
<p>Performance Measure 1: The percentage of charter school sponsors evaluated as Exemplary or Effective based on the legislatively required evaluation</p> <p>--</p> <p>Target: Annual increase in the percentage of community school sponsors evaluated as Exemplary or Effective leading to 75% by 2021</p>	<p><input checked="" type="checkbox"/> No concerns with data quality or performance measure interpretation</p> <p><input type="checkbox"/> Performance measure not applicable at time of site visit (explain)</p> <p><input type="checkbox"/> Unable to assess (explain)</p> <p>Data Quality/Interpretation Concerns:</p> <p><input type="checkbox"/> Inconsistent units of measure over time</p> <p><input type="checkbox"/> Data not aligned with performance measure</p> <p><input type="checkbox"/> Inconsistent wording of performance measure over time</p> <p><input type="checkbox"/> Incomplete or missing data</p> <p><input type="checkbox"/> Other (specify)</p>	<p>March 2017 site visit: The SEA must evaluate sponsors each year according to HB2 requirements.</p> <p>--</p> <p>December 2017 site visit: There are currently 53%, or 24 out of 55 sponsors, earning the rating of Exemplary or Effective. This is more than last year.</p>
<p>Performance Measure 2: Percentage of schools that open under the CSP grant that scores 80% or more total points on the implementation rubric</p> <p>--</p> <p>Target: 80% of applicable schools score 80% or more total points on the implementation rubric</p>	<p><input type="checkbox"/> No concerns with data quality or performance measure interpretation</p> <p><input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain)</p> <p><input type="checkbox"/> Unable to assess (explain)</p> <p>Data Quality/Interpretation Concerns:</p> <p><input type="checkbox"/> Inconsistent wording of performance measure over time</p> <p><input type="checkbox"/> Data not aligned with performance measure</p> <p><input type="checkbox"/> Inconsistent units of measure over time</p> <p><input type="checkbox"/> Incomplete or missing data</p> <p><input type="checkbox"/> Other (specify)</p>	<p>March 2017 site visit: The implementation rubric has not been developed yet. Implementation subgrants are planned for Year 4 of the grant.</p> <p>--</p> <p>December 2017 site visit: This will be reported in the April 2019 APR.</p>

Objective 2: (Operationalizing the Subgrants) Stimulate the creation of high performing charter schools that operate successfully under the CSP program utilizing quality practices

Performance Measure	Performance Measure Data Review	Notes
<p>Performance Measure 3: The percentage of schools opened under the CSP grant that show improvement in their scores on the quality practices area of the CSP subgrant implementation rubric, show improvement in that area</p> <p>--</p> <p>Target: 100% of the schools that open under the CSP grant but did not receive all points on the quality practice area of the CSP subgrant implementation rubric, show improvement in that area</p>	<p><input type="checkbox"/> No concerns with data quality or performance measure interpretation</p> <p><input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain)</p> <p><input type="checkbox"/> Unable to assess (explain)</p> <p>Data Quality/Interpretation Concerns:</p> <p><input type="checkbox"/> Inconsistent units of measure over time</p> <p><input type="checkbox"/> Data not aligned with performance measure</p> <p><input type="checkbox"/> Inconsistent wording of performance measure over time</p> <p><input type="checkbox"/> Incomplete or missing data</p> <p><input type="checkbox"/> Other (specify)</p>	<p>March 2017 site visit: Implementation subgrants are planned for Year 4 of the grant. The implementation rubric has not been developed yet. Data will be collected on the quality practices area, which will be quantifiable and discreet.</p> <p>--</p> <p>December 2017 site visit: This will be reported for the first time in the 2019 APR.</p>
<p>Performance Measure 4: Percentage of schools operating under the CSP grant that achieves or exceed the report card related performance targets set forth in their contracts or are making improvement toward the identified targets</p> <p>--</p> <p>Target: 80% of schools meet their identified performance targets or make improvement</p>	<p><input type="checkbox"/> No concerns with data quality or performance measure interpretation</p> <p><input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain)</p> <p><input type="checkbox"/> Unable to assess (explain)</p> <p>Data Quality/Interpretation Concerns:</p> <p><input type="checkbox"/> Inconsistent units of measure over time</p> <p><input type="checkbox"/> Data not aligned with performance measure</p> <p><input type="checkbox"/> Inconsistent wording of performance measure over time</p> <p><input type="checkbox"/> Incomplete or missing data</p> <p><input checked="" type="checkbox"/> Other (specify)</p>	<p>March 2017 site visit: The performance targets in community school contracts are very extensive and should be narrowed down to manageable metrics that are predominantly consistent across contracts. The universe of metrics that must be collected under this measure's current wording is vast because it includes all performance measures in community school contracts.</p> <p>--</p> <p>December 2017 site visit: This will be reported in the 2019 APR after report cards are released in September 2018.</p>

Sources: *March 2017 CSP Grant Performance Measures Draft 1-24-17*
December 2017 CSP Grant Performance Measures – Final 2017-04-05

Objective 3: Increased academic performance by students attending charter schools

Performance Measure	Performance Measure Data Review	Notes
Performance Measure 1: The percentage of charter schools identified as high performing --	<input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain)	March 2017 site visit: The SEA's annual performance report requires this metric and school report cards generate these data. --
Performance Measure 1: The percentage of community schools identified as high performing Target: 5% annual increase in the percentage of community schools identified as high performing	Data Quality/Interpretation Concerns: <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)	December 2017 site visit: High performing is defined as receiving an A or B on the school report card's performance index. This will be reported in the 2018 APR using report cards released in August 2017.
Performance Measure 2: The number of high-performing charter schools operating in the state -- Target: Annual increase in the number of high performing community schools leading to a total of 400 high performing community schools by 2021	<input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain) Data Quality/Interpretation Concerns: <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)	March 2017 site visit: This is generated by school reports and included in the SEA's annual performance report. -- December 2017 site visit: This will be reported in the next APR. Baseline data have already been collected.
Performance Measure 3: The percentage of charter school students attending high-performing schools --	<input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain)	March 2017 site visit: These data are generated by school reports and included in the SEA's annual performance report. --

Objective 3: Increased academic performance by students attending charter schools

Performance Measure	Performance Measure Data Review	Notes
Target: 70% of community school students are attending high performing schools by 2021	<p>Data Quality/Interpretation Concerns:</p> <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)	December 2017 site visit: Baseline will be reported in the next APR.
<p>Performance Measure 4: By the end of the grant, the schools’ ranking of schools that opened under the CSP grant when compared to a group of public schools identified as having similar demographic characteristics are in the upper quartile of schools with similar demographic characteristics. (For each school, a comparison group will be identified using grade levels served, student demographic data and comparability of community characteristics of the district in which the charter school is located, etc. All schools in the identified comparison group will be ranked based on report card metrics performance index score, K-3 literacy improvement, annual measurable objectives, and four and five-year graduation rate</p> <p>--</p> <p>Target: 85% of schools opened with CSP subgrant funds are in the upper 25% of schools in their comparison group</p>	<p><input type="checkbox"/> No concerns with data quality or performance measure interpretation <input checked="" type="checkbox"/> Performance measure not applicable at time of site visit (explain) <input type="checkbox"/> Unable to assess (explain)</p> <p>Data Quality/Interpretation Concerns:</p> <input type="checkbox"/> Inconsistent units of measure over time <input type="checkbox"/> Data not aligned with performance measure <input type="checkbox"/> Inconsistent wording of performance measure over time <input type="checkbox"/> Incomplete or missing data <input type="checkbox"/> Other (specify)	<p>March 2017 site visit: The SEA will need to determine how to develop this measure and where and how it will be reported. This metric is currently not being used and since these objectives and measures are in draft form, will need to be approved by the SEA’s Data Governance Committee. This comparable group metric is currently not in the SEA’s annual performance report, but could be added according to staff.</p> <p>--</p> <p>December 2017 site visit: This measure was modified to make the timeframe clear.</p>

Sources: *March 2017 CSP Grant Performance Measures Draft 1-24-17*
December 2017 CSP Grant Performance Measures Draft 1-24-17, CSP Performance Measures-Final 2017-17-04-05

3. ADMINISTRATIVE AND FISCAL RESPONSIBILITIES

CSP grantees incur specific administrative and fiscal responsibilities under Federal law. This section focuses on the SEA's statewide strategy and vision for charter schools; its allocation, use and controls over the CSP grant funds and other Federal funds; and the State's associated responsibilities in administering the CSP grant. It includes indicators that cover the State's responsibilities to:

- Implement its State-level strategy and vision for charter schools
- Inform appropriate audiences about Federal funding for charter schools and ensure that charter schools receive their commensurate share of relevant funds
- Allocate no more than the allowable amounts of CSP funds for administration, dissemination, and revolving loan fund purposes
- Administer and ensure appropriate disbursement and accounting for CSP funds
- Monitor the proper use of CSP funds
- Ensure LEAs do not deduct funds for administrative expenses or fees except in certain circumstances
- Ensure the timely transfer of student records
- Maintain and retain records related to the CSP grant funds
- Comply with specific conditions imposed on the grant

Indicator 3.1: STATE-LEVEL STRATEGY AND VISION. The State is implementing its State-level strategy and vision as noted in the approved grant application.

Table 3.1: STATE LEVEL STRATEGY.		
Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>State’s strategy for using charter schools to improve educational outcomes for students results in the creation of high-quality charter schools and/or the closure of poor-performing charter schools.</p> <p><input type="checkbox"/> Not specified in application</p> <p>As noted in the grant application, Ohio’s overall state strategy for improving student academic achievement and attainment, including closing achievement and attainment gaps includes the following key components: 1) Academic content standards; 2) Statewide assessment; 3) High standard for high school graduation; 4) An accountability system; 5) Ensuring that all students can read at grade level by the third grade; 6) Intensive, ongoing system of support for the improvement of school districts and school buildings; 7) Performance standards; 8) Options for students through charter schools and scholarships that create educational options primarily for students who attend or would attend the state’s lowest-performing schools (ORC Chapters 3310 and 3314); 9) Fostering innovation through the “Straight A” innovation grant program (ORC 3319.57); and 10) An adequate and equitable level of funding for education through a combination of State and local funding sources (ORC Chapter 3317).</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>As public schools, charter schools are included in Ohio’s overall State strategy for improving student academic achievement and attainment and closing achievement and attainment gaps. Similar to traditional public schools, charter schools may utilize State standards established by the State Board, must administer statewide assessments, and charter school students are held to same high school graduation requirements.</p> <p>During interviews with the site visit team, ODE noted that the resources for charter schools proposed in the application are provided or planned. The State portion of formula funds is the same for traditional public schools and charter schools, as noted in the application, and municipal school districts may seek voter approval to levy property taxes and share proceeds with a partnering community school located in the district if that school is authorized by an exemplary sponsor. At the time of the visit, only Cleveland Metropolitan School District had such a levy in place. Also, the first \$17 million of the Community Schools Classroom Facilities Grant Program has been awarded for the purchase, construction, reconstruction, renovation, remodeling, or addition to classroom facilities for high-performing charter schools. A second round of awards is expected. At the time the application was written, \$10.25 million of the CSP grant was earmarked as a recovery</p>

Table 3.1: STATE LEVEL STRATEGY.

Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>According to the application, the State’s funding formula ensures the same basic level of financial support for charter and traditional public schools. Beyond basic funding, charter schools can seek voter-approved tax levies statewide, so long as they are overseen by exemplary authorizers; the State’s most recent education budget set aside \$25 million for high-performing charter schools to use on facilities; and ODE is expanding the State’s Academic Distress Commission concept by providing supplemental sources of funding to charters in “recovery districts” overseen by these Commissions.</p> <p>The Ohio Community Collaboration Model for School Improvement (OCCMSI) is an ODE-led initiative that was created to provoke collaboration between charter schools and other public schools, with specifically designed programs and services that feature strategies for academic improvement, youth development, parent/family engagement, health and social services, and community partnerships.</p> <p>As proposed in the application, ODE will collaborate with community education development organizations (CEDOs) including partnering with CEDOs in determining the priority for awards to eligible proposals. The Cleveland Transformation Alliance (CTA) is a CEO that ODE has been working with for the past two years. CTA promotes the development of high-performing district and public charter schools in the area. ODE is committed</p>		<p>district reserve to support the creation of high-quality charter schools in school districts in academic emergency status. For the purpose of the grant, applicants located in the territory of a school district supervised by the State Superintendent of Public Instruction under an Academic Distress Commission will be eligible for subgrant awards under the reserved amount.</p> <p>During interviews with the site visit team, ODE confirmed its commitment to collaborating with community organizations though staff no longer anticipate that partners will determine funding priorities and do not engage with community groups, as proposed. Instead, staff envision collaborating with partners to vet best or promising practices of subgrantee schools. ODE did not describe other ways it is currently collaborating with community organizations to support the development of high-performing charter schools and future collaboration is in the early development phase.</p> <p>--</p> <p>December 2017 site visit: ODE had addressed the lack of CEDO engagement from the March 2017 visit and was implementing its strategy as proposed during the December 2017 site visit. Additionally, two additional efforts were under way: a statewide strategic planning process on achieving educational outcomes and the introduction of community schools as presenters as the State’s School Improvement Institute.</p> <p>ODE staff reported that the State is currently engaged in a strategic planning process around achieving educational outcomes, regardless of the type of school a student attends. Begun in September 2017 and expected to continue through March 2018, the process involves gaining input through stakeholder meetings and focus groups to adjust the State’s plan to make it more current and relevant. ODE noted that they have not begun to address</p>

Table 3.1: STATE LEVEL STRATEGY.

Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>to expanding CTA strategies into all of Ohio’s urban districts and, in doing so, significantly increasing the number of high-quality schools in those areas.</p> <p>Additionally, the State Superintendent is empowered to put in motion complete redesigns of chronically underperforming traditional school districts. The State’s plan for a recovery district will rely on replacing current failing traditional public and charter schools with high-performing charter schools and developing new K-12 pyramids of charters schools. The first recovery district will be formed in Youngstown.</p>		<p>the strategy aspect yet, and this is probably where charter schools will play a role.</p> <p>Best practices of charter schools and traditional public schools were shared at ODE’s recent School Improvement Institute, an annual statewide conference of teachers and administrators. For the first time the conference invited high performing community schools as well as traditional public schools to present, and two community schools did. ODE expects this opportunity for sharing best practices to increase as the conference expands in the future.</p> <p>ODE has engaged CEDOs in the CSP subgrant process by inviting certain organizations in Columbus, Cincinnati, and Cleveland to serve as Need Assessment Advisory Groups (NAAGs) and help define the competitive preference priorities in the RFA for their communities. ODE stated that although these groups declined to participate in this round of subgrant competition, ODE will continue to reach out to them and others, for example, in the Big 8 and Academic Distress Commission districts, to engage CEDOs in future rounds of the RFA.</p>
<p>Statewide <u>vision</u> for charter school growth and accountability results in the creation of high-quality charter schools and/or the closure of poor-performing charter schools.</p> <p>Ohio’s goal for charter school growth and accountability is to grow to 400 schools and for 70% of charter students to be in high-performing schools by 2021.</p> <p>Charter schools submit student achievement, attainment, retention, and discipline data to the State</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>During interviews with the site visit team, ODE confirmed its goal to increase the number of high-quality charter schools through high-quality authorizing. The grantee expects that rigorous charter authorization application processes will result in the creation of high-quality charter schools. The</p>

Table 3.1: STATE LEVEL STRATEGY.

Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>through the Education Management Information System (EMIS). Collected and processed data are used to populate an annual report card for each school. The report focuses on four main areas of charter school performance: academic performance; sustained student enrollment; fiscal accountability; and sponsor/authorizer accountability and oversight.</p> <p>A key component to Ohio’s vision is the creation of high-quality charter schools. The key components of the plan are as follows: 1. Increase levels of high-quality authorizing, 2. Hold authorizers accountable for supporting schools in becoming or maintaining high-quality status, 3. Target Federal Charter School Program funds to support the creation of new high-quality schools, through replication of already proven models, and 4. Impose strict criteria and exercise quality control over authorizers’ actions to open new schools.</p> <p>The key components of the State’s plan to support school closure are: 1. Hold authorizers accountable through the AQPR for making effective termination decisions, and 2. Automatic closure law.</p> <p><input type="checkbox"/> Not specified in application</p>		<p>grantee acknowledged that its pipeline will be greatly reduced due to the limited number of eligible sponsors. Only applicants of the five authorizers rated effective will be eligible to apply for the first round of CSP subgrants. Authorizers rated Ineffective will be required to submit a quality improvement plan. Authorizers rated poor have their authority to sponsor charter schools revoked, subject to an appeals hearing.</p> <p>ODE did not articulate a clear plan for targeting CSP funds to support the replication of proven models.</p> <p>At the time of the site visit, Ohio was in the third year of a three-year safe harbor on closures under the automatic closure law so no overall letter grades of charter schools had been issued. When graded report cards resume in 2018, performance data from the two years prior to safe harbor will be used in conjunction with the most recent data to establish the three consecutive years of low performance required under statute.</p> <p>One provision in HB2 is designed to eliminate “sponsor hopping” by preventing poorly performing community schools from switching authorizers without ODE approval. This provision should make school closures more effective.</p> <p>--</p> <p>December 2017 site visit:</p> <p>At the time of the December 2017 site visit, ODE was implementing its vision as necessary though the CSP pipeline continued to be restricted due to the small number of sponsors meeting the CSP-eligibility standards. ODE released its sponsor ratings for the 2016-2017 school year just before the December 2017 site visit. These ratings, released November 14, 2017, included 2 exemplary, 21 effective, 13 ineffective, and 8 poor sponsors.</p>

Table 3.1: STATE LEVEL STRATEGY.

Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>Eligibility for CSP subgrants mandates that charter schools’ sponsors must receive an overall rating of effective or exemplary and meet or exceed (scoring a 3 or higher) the “Oversite and Evaluation: Site Visit Reports” and “Termination and Renewal Decision-making: Renewal and Non-renewal Decisions” standards on the Sponsor Quality Practices Rubric. Only one sponsor met this standard at the time of the site visit which will limit the number of new schools eligible to apply for CSP subgrants under ODE’s current policies.</p> <p>Overall, since the March 2017 site visit the total number of charter schools in the state decreased from 362 to 340, and the number of charter school closures since 2000 increased from 233 to 260. Further, 2016-17 was the last year for safe harbor on closures under the automatic closure law. At the time of the site visit, ODE was putting together the list of additional charter schools that could be subject to automatic closure.</p> <p>ODE staff stated that their goal was to do more outreach to try to attract more charter school developers to Ohio and, particularly, to academically distressed districts. ODE was implementing its plan to create high-quality charter schools but the immediate impacts of closures and more rigorous sponsor ratings may pose a challenge to reaching the goal of 400 charter schools by 2021.</p>
<p>The State utilizes its logic model to guide grant administration and implementation as well as to determine progress.</p> <p><input type="checkbox"/> Not specified in application</p> <p>The grantee submitted a logic model in its application with the appropriate inputs, activities, outputs, and outcomes that addresses the role of the grant in</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p>

Table 3.1: STATE LEVEL STRATEGY.		
Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>promoting the State-level strategy for using charter schools to improve educational outcomes for students through CSP subgrants.</p>		<p>During interviews with the site visit team, the grantee acknowledged that it has not utilized its logic model to guide grant administration and implementation.</p> <p>--</p> <p>December 2017 site visit: Staff interviewed during the site visit indicated they were not utilizing the logic model for grant administration. In the State’s response to the monitoring report, they documented how they aligned resources and activities to the logic model to guide grant implementation.</p>
<p>The management plan is implemented to achieve proposed objectives on time and within budget.</p> <p><input type="checkbox"/> Not specified in application</p> <p>In its grant application, ODE proposed to hire 3.75 FTE employees to supplement current office staff, including a Director of Quality Charter School Development, Program Administrator, Program Specialists, and Data Manager.</p> <p>Additionally, the application included a work plan that described key strategies for successful implementation of the project along with actions, responsible staff, milestones, and timelines. Key strategies included – Strategy 1: Disseminate information about the CSP grant program to interested parties including potential developers, authorizers, teachers, parents, communities and other stakeholders; Strategy 2: Conduct subgrantee award rounds for planning, year one implementation</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: At the time of the site visit, all work on the grant was being done in kind. Staff have been assigned tasks but no new staff were hired. (Subsequent to the site visit some additional staffing changes were made.) ODE could not provide the FTE of staff assigned to the grant.</p> <p>ODE provided an updated work plan as part of the document request for the site visit. The Data Governance Committee was added to the work plan. The Data Governance Committee was established in response to eSchools and dropout prevention and recovery schools not being included in performance reports. The committee meets regularly to review any data that ODE uses or publishes to ensure the quality of the data. Two items were removed from the work plan: Conduct ODE monitoring review and TA/support activities,</p>

Table 3.1: STATE LEVEL STRATEGY.

Elements of the overall State strategy and vision for charter schools.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>and year two implementation grants; Strategy 3: Monitoring and technical assistance (TA)/support activity; and Strategy 4: Data collection, analysis and synthesis.</p>		<p>and ODE review of authorizer compliance with monitoring and TA/support requirements. ODE staff believed they were removed inadvertently.</p> <p>--</p> <p>December 2017 site visit:</p> <p>ODE has made significant strides in executing its grant since the March 2017 site visit, no implementation issues were present during the December 2017 visit. OCS increased its staff capacity by hiring and onboarding a new Grants Manager and restructuring other positions. It held a first subgrant competition and awarded three subgrants which were ongoing. Staff stated that they are working with ED to begin a second round of the competition.</p> <p>ODE has worked closely with ED to accomplish this work. ED’s oversight has included setting and monitoring progress on several high-risk conditions of the grant (discussed in Indicator 3.9), as well as a corrective action plan, and providing other intensive support such as weekly meetings and approvals of documents. Key to ODE’s progress has been the development of a Comprehensive Plan for administering the grant and a Gantt chart for tracking progress on the high-risk conditions, both required by ED (see Indicator 3.9 for additional detail). Developing the Comprehensive Plan has required ODE to think through and align all the parts of its CSP grant program, while the Gantt chart has put timelines on accomplishing activities. ODE staff stated that the Comprehensive Plan is “like our bible,” and that they also use the Gantt chart as a management tool to stay up to date on timelines.</p>
<p>Sources: <i>March 2017</i></p>	<p><i>2015 CSP Grant Application; ODE website; Commission Awards Community School Facility Grants Press Release; Ohio Facilities Construction Committee website; ODE Letter to ED dated November 18, 2015</i></p>	
<p><i>December 2017</i></p>		<p><i>Ohio CSP Grant Administration Comprehensive Plan, Ohio High-Risk Condition Gantt Chart, ODE Corrective Action Plan</i></p>

Indicator 3.2: FEDERAL PROGRAMS AND FUNDING. The State informs appropriate audiences about the SEA’s charter school grant program, Federal funds that the charter school is eligible to receive, and Federal programs in which the charter school may participate, and ensures that each charter school in the State receives its commensurate share of Federal education formula funds.

Table 3.2: FEDERAL PROGRAMS AND FUNDING.		
Responsibilities of the SEA to inform and ensure access to Federal programs and funding.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Inform teachers, parents, and communities of the State educational agency's charter school grant program:</p> <p><input type="checkbox"/> Not specified in application</p> <p>The application specified that ODE will develop a dissemination and engagement plan to guide communication with key stakeholders including potential developers, authorizers, teachers, parents, and communities. Information will be posted on the ODE website, and disseminated through print, radio, and television outlets, and through relationships with local partners (e.g., advocacy and social service organizations). In addition, unspecified outreach will be directed to parents and communities.</p>	<p>Yes</p> <p>No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Thus far, information about ODE’s grant application and correspondence with ED has been posted on the SEA website and a CSP-specific website that provides information about grant opportunities has been drafted but is not yet live.</p> <p>ODE has not yet developed a dissemination and engagement plan to guide communication with key stakeholders. The AUP document indicates that public notice will be disseminated through direct email, ODE’s Ed Connections Newsletter, ODE Updates, the SEA website, and through posting on social media (e.g., Twitter, Facebook, etc.). While these strategies were outlined in the AUP document, OCS staff did not describe how information will reach all relevant stakeholder groups such as parents and community members beyond who is reached through listservs and postings on the SEA website.</p> <p>--</p> <p>December 2017 site visit: By the December 2017 visit, ODE had developed and implemented a dissemination and engagement plan to ensure interested parties were aware of the CSP grant opportunity. In addition to posting the SEA’s grant</p>

Table 3.2: FEDERAL PROGRAMS AND FUNDING.

Responsibilities of the SEA to inform and ensure access to Federal programs and funding.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>application and correspondence with ED on the SEA website, ODE developed and launched a CSP-specific website that houses the notice of grant opportunity, RFA, information on the application process, information on the review and award process, application forms and templates, application training videos, an allowable costs guide, and frequently asked questions. To raise awareness about the CSP grant opportunity, OCS arranged for announcements to be sent out via email distribution lists (e.g., community school and sponsor distribution lists, Ohio Education Directory System distribution list) and posted on social media (i.e., Facebook, Twitter, LinkedIn). An announcement was also posted in the EdConnection newsletter.</p>
<p>Inform each charter school in the State about Federal funds that the charter school is eligible to receive:</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p>
<p><input type="checkbox"/> Not specified in application</p>		<p><input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>
<p>The application indicated that ODE will hold annual seminars to notify charter and traditional districts about Federal entitlement funding opportunities. Discretionary grant opportunities will be publicized in the Superintendent’s weekly newsletter, webinars, and in the Comprehensive Continuous Improvement Plan (CCIP) system.</p>		<p>March 2017 site visit: Exceeding what was stated in the application, seminars to notify charter and traditional districts about Federal funding are carried out twice per year by staff from the Office of Federal Programs. Discretionary grant opportunities are publicized as described in the application. --</p>
		<p>December 2017 site visit: No changes were observed during the December 2017 visit; this element was still being implemented as necessary.</p>

Table 3.2: FEDERAL PROGRAMS AND FUNDING.

Responsibilities of the SEA to inform and ensure access to Federal programs and funding.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Ensure that each charter school in the State receives the charter school's commensurate share of Federal education funds that are allocated by formula each year, including during the first year of operation of the charter school:</p> <p><input type="checkbox"/> Not specified in application</p> <p>To ensure accurate and timely disbursement of Federal funds, student enrollment is reported once annually except in the case of new or expanding charter schools, for which enrollment is submitted in fall for an initial allocation and again in winter for a revised allocation. This process is part of the established grants management routine.</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The allocation process to ensure accurate and timely disbursement of funds reflects what was described in the grant application. A good faith effort is made to ensure schools receive all funds within 5 months of opening. Specifically, the Office of Federal Programs is alerted when a new charter contract or a change in an existing charter contract is submitted. For new or expanding schools (i.e., those adding more students than would be expected in a typical year), preliminary enrollment is documented in October and allocations occur in January based on revised enrollment counts. Existing schools that are not expanding receive allocations in July based on the previous year's enrollment.</p> <p>--</p> <p>December 2017 site visit: No changes were observed during the December 2017 visit; this element was still being implemented as proposed.</p>

Sources: *March 2017 Draft CSP Grant Webpage, OH Community Schools Webpage, CSP AUPs 11 29 2016 updated 02-08-2017, Federal Program Communication to Eligible Community Schools, Reallocation of ESEA and IDEA Grant Business Rules Starting SY 16-17*

December 2017 Draft CSP Grant Webpage, OH Community Schools Webpage, CSP AUPs 11 29 2016 updated 02-08-2017, Federal Program Communication to Eligible Community Schools, Reallocation of ESEA and IDEA Grant Business Rules Starting SY 16-17, OH CSP Grant Webpage

Indicator 3.3: ALLOCATION OF CSP FUNDS. The proportion of grant funds reserved by the State for each activity does not exceed the allowable amount.

Table 3.3: ALLOCATION OF CSP FUNDS.		
Limits on the allocation of CSP funds.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Not more than 5% for administrative expenses associated with the program:</p> <p>In the application, the grantee proposed to utilize \$2,908,320 of the requested \$71,058,320 award (4.1%) toward administrative expenses.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Due to delays in funding subgrantees, the grantee has elected to utilize a conservative approach in spending administrative funds in which allocation of administrative funds will be based on the number of subgrantees funded. Work toward accomplishing CSP grant goals thus far has been completed in kind by ODE staff. Administrative funds will be utilized to pay for the independent monitor, who has yet to be hired. Controls have been implemented in the CCIP system to ensure no more than 5 percent of funds are allocated for administrative purposes and controls have been implemented in the Ohio Administrative Knowledge System (OAKS) to ensure no more than 5 percent of funds are spent on administrative expenses.</p> <p>--</p> <p>December 2017 site visit: No implementation issues with the 5% cap on administrative expenses were present. Due to delays in project implementation, ED approved the reduction of ODE’s grant from \$71,058,320 to \$49,380,957. ODE plans to use \$2,230,954 (4.5%) of the revised award on administrative expenses. Thus far the grantee has requested and been reimbursed for \$11,000 of administrative funds to pay for the external monitor. This accounts for 0.02% of the revised award.</p>

Table 3.3: ALLOCATION OF CSP FUNDS.

Limits on the allocation of CSP funds.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Not more than 10% to support allowable dissemination activities:</p> <p>The application indicated that funds would only be used for planning and implementation grants. Dissemination grants were not included in the application narrative.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).
<p>Not more than 10% for the establishment of a revolving loan fund:</p> <p>The application indicated that funds would not be utilized for a revolving loan fund.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).

Sources: *March 2017 CSP Fiscal Management Plan*

December 2017 CSP Fiscal Management Plan, Budget Reduction Memo for FY 17 NCC Slate, RE: Ohio CSP Modification Request (email)

Indicator 3.4: ADMINISTRATION OF CSP FUNDS. The SEA administers the CSP funds and monitors subgrantee projects to ensure the proper disbursement, accounting, and use of Federal funds.

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.		
Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
2 CFR 200.302 Financial Management and 2 CFR 200.313 Equipment		
(1) Financial reporting (e.g., complete disclosure of financial results)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The Office of School Finance (OSF) is responsible for providing budget support to OCS including budget management, monitoring, and guidance. OSF staff complete financial monitoring on a monthly and quarterly basis. ODE uses the Ohio Administrative Knowledge System Business Intelligence (OAKS BI) to track and report on grant budgets, revenues, and expenditures. OAKS BI reports are used to reconcile the SEA’s accounting system, Ohio Administrative Knowledge System Financials (OAKS FIN), and compare budgets housed in CCIP to actual expenditures. Regarding subgrantees, the AUPs outline that sponsors will conduct regular subgrantee monitoring activities. Monitoring carried out by sponsors will include monthly enrollment and financial records reviews and twice annual comprehensive reviews to ensure each subgrantee is in compliance with State and Federal regulations, abiding by their contract, and progressing toward their performance standards. Reports from all sponsor monitoring activities will be submitted to OCS for review. In addition, subgrantees will be required to conduct an annual independent financial and/or single audit and submit reports to ODE. -- December 2017 site visit: At the time of the December 2017 visit, no changes in ODE’s financial reporting process were observed; the grantee was implementing as necessary. Subgrantees reported that sponsors conduct monthly enrollment and financial records reviews as described in the AUPs. During the

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		December 2017 visit, subgrantees were in the process of submitting materials for their first comprehensive review but documents had not yet been reviewed by ODE.
(2) Accounting records (e.g., source and application of funds)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The grantee uses several systems to manage accounting records. CCIP houses grantee and subgrantee budgets and is used to specify budget limits and controls. OAKS FIN is used to manage finances. As the SEA's accounting system, all payments and financial transactions are stored in OAKS FIN. The OAKS FIN system utilizes accounting codes to separate funds for different grants, departments, and fiscal years. Budgets housed in CCIP are aligned to those submitted and confirmed in OAKS FIN. The Central Payment System (CPS) serves as the mechanism for making payments after expenditures are approved. OAKS BI serves as the SEA's data warehouse and maintains records of all financial data. In its review of the monitoring report, the grantee clarified that OCS staff approves all subgrantee budgets in CCIP before sending awards to the subrecipient and accepting Payment Cash Requests (PCRs) for reimbursement. ODE posts allowable costs on the CCIP for review and reference for both recipients and school finance staff. PCRs are checked electronically against the subrecipient's budget before school finance staff review them. The OSF will send PCRs to the OCS Grants Manager for allowable cost review and approval, and OCS will seek approval from ED before approving payments in the CCIP. -- December 2017 site visit: During the December 2017 visit, ODE had sufficient procedures in place for managing accounting records and were following the same procedures detailed from the March 2017 visit. However, ODE did not have adequate processes in place to ensure approved subgrant budgets were fully justified and supported by the budget narrative.

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>(3) Internal control (e.g., process and measures to account for funds, property, and assets)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>A review of subgrantee budgets found that two differed between what was proposed in the application and the approved budget in CCIP. In one case, the subgrantee was awarded contingent on a budget modification. This subgrantee modified their budget as requested, and the changes were captured and approved in the CCIP system. The modification utilized funds for additional supplies, including an iPad mini, locking file cabinets, and bean bag chairs. In the second case, the subgrantee described expenses in their application budget narrative that were \$5,096 less than the award of \$350,000. Based on the content of the subgrant application, which refers to a request for \$350,000 elsewhere, it is likely this discrepancy was a mathematical error on the part of the subgrantee, but ODE did not ask the subgrantee for clarification or to align the narrative with the budget. The extra money appears to have been allocated to the supplies category in the finalized budget, but no budget revisions were logged in CCIP post-award to align the narrative with the budget. ODE was not aware of this discrepancy and did not provide documentation identifying when this budget change occurred and how monies were reallocated.</p> <p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The grantee created a fiscal management plan to outline policies, processes, and procedures for CSP funds. As one of the specific conditions imposed on the grant, ED is requiring that all funds be dispensed to ODE on a reimbursement basis after approval from ED. To accomplish this the CSP grant will not fall under typical ODE draw down procedures and instead, the CSP Project Director will complete weekly expenditure reimbursement requests and send payment requests to ED for approval. Funds will only be drawn after ED approval is granted. While subgrants have not yet been awarded, subgrantee payments will only be made on a reimbursement basis following the same process of approvals.</p>

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>State guidance requires that all assets are inventoried and reported to the Ohio Department of Administrative Services.</p> <p>--</p> <p>December 2017 site visit:</p> <p>The grantee has adequate internal controls in place at the State; however, subgrantees are not appropriately tagging CSP assets. Additionally, the PCR process as implemented has shifted from what was communicated to subgrantees in terms of timelines, ability to submit two PCRs per month, and documentation requirements.</p> <p>As required, all grantee and subgrantee payments are made on a reimbursement basis after review from OCS, OSF, and ED staff. Although ODE initially intended to submit weekly reimbursement requests, this was changed to twice per month to reduce review process burden for ODE and ED. Subgrantees were told that reimbursements can be requested on the 15th and 30th of each month and began spending under the notion that they would be able to request and receive reimbursements every other week.</p> <p>In practice, reimbursements have taken longer than two weeks. Subgrantees raised issues regarding the timeliness of reimbursements due to several factors. First, subgrantees noted that the documentation required with their PCRs varied from submission to submission without any guidance in advance to inform them about changes to required documentation. This resulted in several rounds of submission, review, and approval between subgrantees, ODE, and ED, causing a delay in reimbursements. Second, the PCR submission process only allows one active PCR at a time such that subgrantees cannot begin the PCR process for new expenses until the previous PCR is reimbursed. These issues coupled together placed subgrantees in difficult financial positions as they were unable to submit for new expenses until the prior PCR was complete. Subgrantees reported that having clearer guidance on required documentation from the outset, the ability to submit new PCRs while other PCRs are pending, and more realistic information about the timeframe for reimbursement would have been helpful for financial planning purposes.</p>

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>(4) Budget control (e.g., process and measures to compare outlays with budget amounts)</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>Although State guidance requires that assets are inventoried, two of the three subgrantees had not yet implemented a tagging system to identify CSP purchases and did not appear to be aware that tagging is required. These subgrantees indicated they know what was purchased with CSP funds based on common sense (e.g., all new furniture was purchased with CSP funds; all curriculum was purchased with CSP funds), which may be problematic in the future when similar items are purchased through other funding sources.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: The grant administration team within OSF is responsible for managing the grant lifecycle financials including monitoring grant activity and close-out, as well as establishing budget controls and the maintaining of grant records. This team works closely with staff in other units of OSF and with OCS to carry out these responsibilities.</p> <p>The overall grant budget and all subgrantee budgets will be input into the CCIP system. Budgets will not be approved by OCS staff in CCIP unless they adhere to the specific grant requirements. In its review of the monitoring report, the grantee clarified that OCS approves overall grant budgets before creating them in the CCIP and OAKS FIN. The office submits subgrantee awards to CCIP for Office of Grants Management approval. These include OCS-approved subgrantee detailed budgets.</p> <p>CCIP budgets will then be submitted to Budget Management for approval and incorporation into the OAKS FIN system. Because all PCRs will be classified as high risk, all subgrantees will receive payments on a reimbursement basis. PCRs will require supporting documentation and will be reviewed by a Grants Payment and Analysis Senior Analyst to ensure allowability of costs and timing. Next, the PCR will be sent to the Office of Community Schools for review and approval. The office will forward the PCR to ED for review and approval. Once ED approval is secured, the</p>

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>PCR will be approved and the subgrantee will be reimbursed. Throughout the process, OAKS BI is used to track and report on grant budgets, revenues, and expenditures. The grant administration team uses OAKS BI to review and reconcile each Federal draw.</p> <p>While this process appears to be highly regulated, the initial determinations of budget approvals, as well as PCR reviews, will rely on the OCS staff providing ample training and continued consultation with the OSF staff to ensure allowable costs are fully understood. Currently, the plan to train school finance staff and facilitate ongoing collaboration on allowable costs has not been articulated.</p> <p>--</p> <p>December 2017 site visit:</p> <p>ODE had implemented a process to ensure greater coordination between OCS and OSF to ensure CSP budgets are effectively monitored and managed. Greater collaboration and coordination among OCS and OSF staff was observed during the December 2017 visit. Processes for communication are clearly documented in the CSP Fiscal Management Plan. Due to difficulties providing sufficient documentation to ED for subgrantee reimbursements early in the year, a dedicated OSF staff member with a background in auditing is now assigned to handle all subgrantee reimbursement requests. The processes utilized by this individual serve as a pre-audit of all expenditures prior to reimbursement.</p>
<p>(5) Allowable cost (e.g., procedures to determine allowable, allocable, and reasonable use of funds).</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>The grantee stated that the OCS Grants Manager, with the help of OSF’s Senior Financial Analyst, will be responsible for determining whether expenses are allowable and should be reimbursed. While processes are currently in place to verify allowability for other grant programs, success in this arena requires training from and collaboration with the OCS staff. Currently, the parameters of allowable costs have not been conveyed by the OCS. Staff from both OCS and OSF explained</p>

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>that some type of training would occur but the process for and content of this training has not yet been conceptualized. OSF staff indicated that they will work with OCS to consult on atypical requests but exact processes for facilitating and documenting these conversations and subsequent decisions has not been fully developed. In addition, while a list of allowable expenses is included in the draft RFA for subgrantees, details regarding how subgrantees will learn about allowable costs were not articulated by ODE staff during the visit.</p> <p>--</p> <p>December 2017 site visit:</p> <p>The grantee was implementing this element as necessary. Greater collaboration and coordination among OCS and OSF staff was observed during the December 2017 visit. Processes for communication are clearly documented in the CSP Fiscal Management Plan. A dedicated OSF staff member with a background in auditing is now assigned to review all CSP PCRs to provide a preliminary audit of spending. Subgrantees were provided with documentation and training about allowable costs and reported that the information they received about allowability was sufficient. In addition, subgrantees indicated they reach out to OCS with any questions about allowability and have received prompt responses.</p>
<p>(6) Source documentation (e.g., evidence from transactions that accompany accounting records)</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>High-Risk Specific Condition #1 requires ODE to submit documentation of all expenditures and supporting evidence with each payment request.</p> <p>All subgrantee expenditures will be made on a reimbursement basis through the submission of PCRs. PCRs will require the submission of source documentation to verify that spending is allowable and occurred within the appropriate time period. Grants Payment and Analysis staff will be responsible for reviewing PCRs and supporting documentation and these materials will be submitted to ED for final review and approval before reimbursements are made.</p>

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
(7) Cash management (e.g., timely disbursement of funds to not accrue interest)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>--</p> <p>December 2017 site visit: The general process for providing source documentation to receive reimbursements occurred as planned. From the outset, ODE ensured subgrantees were aware that all CSP funds are disbursed on a reimbursement basis and informed subgrantees that requests for reimbursement in the form of PCRs could be submitted twice per month.</p> <p>Subgrantees interpreted this guidance such that they expected reimbursements could be submitted and paid out every two weeks. Subgrantees reported challenges with this process and delays in reimbursements due to changing source documentation requirements and the inability to have more than one active PCR. Source documentation required by ODE changed due to questions and requests for further information raised by ED after reviewing early PCRs. Subgrantees reported that they were unaware of changes to documentation requirements until after submitting a PCR. This created the need for back and forth between the subgrantees and ODE to ensure proper documentation was submitted, resulting in delayed reimbursements. Subgrantees requested greater clarity from ODE about changes to source documentation requirements.</p> <p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: All payments will be made on a reimbursement basis and because each charter school constitutes its own LEA, funds will be distributed directly to each subgrantee. Thus, interest accrual does not appear to be a potential issue.</p> <p>--</p> <p>December 2017 site visit: No changes were observed during the December 2017 visit; this element was being implemented as necessary.</p>

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Other Regulations		
34 CFR 80.36 Procurement standards, including competitive bidding and contracting	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: ODE requires competitive bidding for procurement and contracting. Purchases of less than \$500 require two verbal quotes and are authorized by the program office. Purchases of more than \$500 but less than \$25,000 require posting to the Department of Administrative Services (DAS) and ODE websites and must be approved by the Chief Financial Officer. Purchases of more than \$50,000 must be handled by DAS and require approval from Chief Legal Counsel. To ensure staff are knowledgeable about the procurement policies and procedures, all staff involved in the procurement process must participate in annual training. -- December 2017 site visit: This element was being implemented as necessary. In addition to maintaining the processes detailed from the March 2017 visit, ODE had also created a requirement for subgrantees to describe and maintain procurement policies. As part of the RFA, applicants are expected to describe their procurement policies and be prepared to submit them if requested. In addition, assurances listed in the RFA require subgrantees to develop written procurement policies and abide by all local, State, and Federal procurement policies.
34 CFR 75.525 Conflict of interest	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).

Table 3.4: FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES.

Uniform Guidance and EDGAR Regulations	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>March 2017 site visit:</p> <p>To protect against conflicts of interest, both State employees and suppliers are expected to adhere to Ohio ethics and conflict of interest laws, including Ohio Revised Code Sections 102.01 to 102.09 and former Governor Strickland’s Executive Order 2007-01S for Ethics. Guidance on procurement procedures suggests certification language for all purchases verifying that the supplier has reviewed and adhered to relevant laws. ODE management is required to attend an annual ethics training provided by the Ohio Ethics Commission to ensure they are familiar with the ethics policies.</p> <p>Further, the draft RFA indicates that subgrantees will be expected to adhere to the same ethics guidelines as are relevant to ODE staff. Subgrant applicants will be required to submit their conflict of interest policy as part of the subgrant application.</p> <p>--</p> <p>December 2017 site visit:</p> <p>This element was being implemented as necessary and as detailed from the March 2017 visit. Subgrantees were required to submit their conflict of interest policy with their application as planned.</p>
<p>34 CFR 80.32(e) Disposition of assets</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p>

See below for additional detail.

Sources:	March 2017	CSP Fiscal Management Plan, Community School Suspension and Closing Procedures, DAS Directive GS-D-12, Draft Request for Applications
	December 2017	CSP Fiscal Management Plan, Community School Suspension and Closing Procedures, DAS Directive GS-D-12, Draft Request for Applications, CSP_RequestForApplication, CSP_AllowableCosts, Subgrantee Application Narratives, Budget Modification History Log, Route Payment Emails between ODE and ED

Table 3.4 FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES Additional Information. Detailed Information.

Approach to ensuring that subgrantees receive subgrant funds in appropriate timeframe.	Provide detailed narrative about the grantee’s current approach.
<p>Accounting Systems Process (e.g., flow of funds)</p>	<p>March 2017 site visit:</p> <p>The accounting process is comprised of three systems that work together to ensure budgeted allocations are allowable, requests for reimbursements are allowable, payments are made in a timely fashion, and transaction records are maintained. CCIP houses applications and budgets and serves as the tool to submit claims. The grantee and all subgrantees submit budgets to CCIP. Budgets are reviewed by OCS to ensure the expenses are allowable. After OCS approves the budget in CCIP, it is sent to OSF for secondary approval by the Budget Management team. Staff from Budget Management then enter the approved budget into OAKS. OAKS includes several different modules with two modules, Financials (OAKS FIN) and Business Intelligence (OAKS BI), being most pertinent to the accounting process. Entering the budget into the OAKS FIN system places the budget items into the Chart of Accounts (COA), which ensures distinct accounting codes for different grants, projects, and fiscal years. OAKS BI serves as the data warehouse and stores all relevant fiscal information from the development of budgets through final expenditures.</p> <p>Reimbursement will be used for all CSP fund expenditures. After an expense is incurred, the subgrantee will complete a PCR and upload supporting documentation into the CCIP system. The CCIP system includes internal controls to verify that all necessary information has been submitted. After CCIP verification, the PCR is sent to the Central Payment System and reviewed by a Senior Financial Analyst in Grants Payment and Analysis. The PCR is reviewed for allowability of costs, time period, and cash management. If deemed allowable, the PCR is sent to ED for review. PCRs will be submitted to ED on a weekly basis. ED will conduct a secondary review of the PCR and determine if it is approved. After approval is granted the PCR will be sent to OAKS FIN for payment and Accounting Services staff will draw funds. Because each community school is its own LEA, funds are sent directly to the school after this process is complete.</p> <p>--</p> <p>December 2017 site visit:</p> <p>There were no changes to the accounting process observed during the December 2017 visit. Reimbursement processes changed slightly. After an expense is incurred, the subgrantee completes a PCR and uploads supporting documentation into the CCIP system. Although ODE initially required some documentation along with the PCR, the specific documentation required to process the PCRs changed over time based on conversations with ED. Initially, PCRs were reviewed by a Senior Financial Analyst in Grants Payment and Analysis. To ensure greater consistency in the collection of appropriate source documentation, ODE modified the process such that a dedicated OSF staff member with a background in auditing reviews PCRs and documentation, resulting in a pre-audit of all expenditures.</p>

Table 3.4 FISCAL CONTROL AND FUND ACCOUNTING PROCEDURES Additional Information. Detailed Information.

Approach to ensuring that subgrantees receive subgrant funds in appropriate timeframe.	Provide detailed narrative about the grantee’s current approach.
	<p>The PCR is reviewed for allowability of costs, time period, and cash management. If deemed allowable, the PCR is sent to ED for review. PCRs are submitted to ED up to twice per month. ED conducts a secondary review of the PCR and determines if it is approved. In some instances, ED requested clarifications or additional source documentation. After approval is granted, the PCR is sent to OAKS FIN for payment and Accounting Services staff will draw funds. Because each community school is its own LEA, funds are sent directly to the school after this process is complete.</p>
Disposition of Assets	<p>March 2017 site visit:</p> <p>ODE guidance on community school suspension and closure procedures outline processes for the disposition of assets in the event of a closure. This guidance indicates that schools should follow EDGAR liquidation procedures in 34 CFR 80.32 for items worth \$5,000 or more. Assets valued at less than \$5,000 should be disposed of per the school’s disposition plan and all dispositions should be tracked. Currently, no subgrants have been awarded and therefore school disposition plans were not reviewed.</p> <p>In addition to these general policies, the <i>Community School Suspension and Closing Procedures</i> guidance indicates that assets acquired through CSP funds must be first offered to other community schools. If no community schools take the assets, an auction sale will occur. Any remaining assets after the sale will be offered to public school districts. A written report outlining where assets were disposed must be provided to OCS.</p> <p>--</p> <p>December 2017 site visit:</p> <p>Disposition of assets policies were still being implemented as described from the March 2017 visit. ODE and subgrantees had policies in place for ensuring proper asset disposal in the case of community school suspension or closure.</p>

Sources: *March 2017* *CSP Fiscal Management Plan, Community School Suspension and Closing Procedures*
December 2017 *CSP Fiscal Management Plan, Community School Suspension and Closing Procedures, Route Payment Emails between ODE and ED*

Indicator 3.5: USE GRANT FUNDS. The SEA ensures that subgrantees' use of Federal funds is allowable, allocable, and/or reasonable.

Table 3.5: USE OF GRANT FUNDS.		
Use of the grant funds for the approved budget categories.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Post-award planning and design of the educational program		
Refinement of the desired educational program and of the methods for measuring progress toward those results	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> No concerns regarding use of funds in this category (explain below). <input type="checkbox"/> Unique uses of funds identified (explain below). <input type="checkbox"/> Specific guidance on this topic provided by the SEA to subgrantees (explain below). <input type="checkbox"/> Allowable, allocable, or reasonable use issues identified (explain below). March 2017 site visit: The draft RFA uses the Federal statutory language regarding allowable expenses. -- December 2017 site visit: The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide provides detail about common expense and when they are and are not allowable. Subgrantees did not budget for, nor use funds for, refinement of the educational program.
Professional development of teachers and other staff who will work in the charter school	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> No concerns regarding use of funds in this category (explain below). <input type="checkbox"/> Unique uses of funds identified (explain below). <input type="checkbox"/> Specific guidance on this topic provided by the SEA to subgrantees (explain below). <input type="checkbox"/> Allowable, allocable, or reasonable use issues identified (explain below). March 2017 site visit: The draft RFA uses the Federal statutory language regarding allowable expenses. --

December 2017 site visit:

The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide provides detail about common expense and when they are and are not allowable. Subgrantees did not budget for, nor use funds for, post-award planning and design professional development.

Other uses of funds for planning or program design Yes No

No concerns regarding use of funds in this category (explain below).

Unique uses of funds identified (explain below).

Specific guidance on this topic provided by the SEA to subgrantees (explain below).

Allowable, allocable, or reasonable use issues identified (explain below).

March 2017 site visit:

The draft RFA describes, “development and implementation of plans and systems to increase student academic proficiency rates, close achievement gaps and increase high school graduation rates” as an allowable ‘other’ expense related to post-award planning and design.

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December 2017 site visit:

The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide provides detail about common expense and when they are and are not allowable. Subgrantees did not budget for, nor use funds for, other planning or program design.

Initial implementation of the charter school

Informing the community about the school Yes No

No concerns regarding use of funds in this category (explain below).

Unique uses of funds identified (explain below).

Specific guidance on this topic provided by the SEA to subgrantees (explain below).

Allowable, allocable, or reasonable use issues identified (explain below).

March 2017 site visit:

The draft RFA uses the Federal statutory language regarding allowable expenses.

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December 2017 site visit:

The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide indicates funds can be spent on outreach materials including postage for mailers, development of brochures and postcards, radio spots, and signage during the implementation phase.

According to one subgrantee’s budget, \$25,000 of subgrant funds will be spent on a marketing outreach campaign (e.g. flyers, direct marketing). Thus far, this subgrantee requested and received a reimbursement of \$17,667.31 for marketing expenses. According to another subgrantee’s budget, \$43,000 of subgrant funds will be spent on branding and community awareness. Thus far, this subgrantee requested and received a reimbursement of \$9,864.41 for radio advertisements and postcard mailers.

Acquiring necessary equipment and educational materials and supplies

- Yes
- No

No concerns regarding use of funds in this category (explain below).

Unique uses of funds identified (explain below).

Specific guidance on this topic provided by the SEA to subgrantees (explain below).

Allowable, allocable, or reasonable use issues identified (explain below).

March 2017 site visit:

The draft RFA uses the Federal statutory language regarding allowable expenses.

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December 2017 site visit:

The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide indicates funds can be used for expenses such as technology hardware, software, furniture, and books during the implementation phase.

According to one subgrantee’s budget, \$195,000 of subgrant funds will be spent on technology, software, furniture, and supplies. Thus far, this subgrantee requested and received a reimbursement of \$33,992.40 for technology and supplies expenses.

According to another subgrantee's budget, \$204,775 of subgrant funds will be spent on furniture, technology, and supplies. This figure includes the Achievement Net program (\$35,100), which is bundled with professional development and coaching for teachers. Thus far, this subgrantee requested and received a reimbursement of \$141,954 for technology and furniture.

According to another subgrantee's budget, \$180,656 of subgrant funds will be spent on supplies, furniture, and technology. Thus far, this subgrantee requested and received a reimbursement of \$3,140.50 for technology and software.

Acquiring or developing curriculum materials

Yes
 No

No concerns regarding use of funds in this category (explain below).
 Unique uses of funds identified (explain below).
 Specific guidance on this topic provided by the SEA to subgrantees (explain below).
 Allowable, allocable, or reasonable use issues identified (explain below).

March 2017 site visit:

The draft RFA uses the Federal statutory language regarding allowable expenses.

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December 2017 site visit:

The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide indicates funds can be spent on textbooks and curriculum during the implementation phase.

According to one subgrantee's budget (not yet reimbursed), \$100,000 of subgrant funds will be spent on curriculum. According to another subgrantee's budget, \$82,129 of subgrant funds will be spent on curriculum. Thus far, this subgrantee requested and received a reimbursement of \$11,724.37 for curriculum. According to another subgrantee's budget (not yet reimbursed), \$35,791.98 of subgrant funds will be spent on curriculum.

Other initial operational costs that cannot be met from State or local sources

Yes
 No

No concerns regarding use of funds in this category (explain below).
 Unique uses of funds identified (explain below).
 Specific guidance on this topic provided by the SEA to subgrantees (explain below).

Allowable, allocable, or reasonable use issues identified (explain below).

March 2017 site visit:

The draft RFA describes other initial operating costs considered allowable in situations in which the costs are not covered by State or local funds. These expenses include costs for office functioning, installation of new computers, personnel during initial implementation, and rental/occupancy costs prior to school opening.

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December 2017 site visit:

The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide indicates funds can be used for other expenses such as administrative furniture in the implementation phase and essential staff salaries in the implementation phase for up to three months prior to the school opening.

According to one subgrantee's budget, \$10,000 of subgrant funds will be spent on acquiring technology, furniture, and supplies to establish a main office. Thus far, this subgrantee requested and received a reimbursement of \$1,414.19 for initial office set up expenses.

According to another subgrantee's budget, \$100,056.90 of subgrant funds will be spent on initial operating costs including the management organization start up services fee (which includes oversight of curriculum and development, teacher professional development, talent recruitment, supplies, and operations; \$68,977.56), setting up payroll services (\$3,000), direct dialing service (\$333.79), rent prior to school opening (\$627.18), compensation and benefits for the School Director and Dean of Family/Community Engagement prior to the school opening (\$23,118.37), and administrative office equipment (\$4,000). Thus far, this subgrantee requested and received a reimbursement of \$18,857.25 toward rent and salary and benefits for the School Director and Dean of Families.

Other uses of funds for initial implementation

Yes

No

No concerns regarding use of funds in this category (explain below).

Unique uses of funds identified (explain below).

- Specific guidance on this topic provided by the SEA to subgrantees (explain below).
- Allowable, allocable, or reasonable use issues identified (explain below).

March 2017 site visit:

No subgrants have been awarded to date and other uses of funds for initial implementation are not described in the RFA beyond what is described above. The RFA outlines expenses that are not allowable including the acquisition of a vehicle, construction, food, and school apparel for staff or students.

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December 2017 site visit:

The RFA uses Federal statutory language regarding allowable expenses and the Allowable Costs Guide indicates funds can be used for other purposes including one time professional development.

According to one subgrantee's budget (not yet reimbursed), \$15,000 of subgrant funds will be spent on NWEA and Curriculum professional development and after school training stipends for time spent in professional development during the school's first year of operation.

According to another subgrantee's budget, \$15,000 of subgrant funds will be spent on professional development related to iReady and EPSON Whiteboards. Thus far, this subgrantee requested and received a reimbursement of \$10,500 for EPSON Whiteboards training.

According to another subgrantee's budget, \$33,495.09 of subgrant funds will be spent on compensation and benefits for teacher time attending a summer professional development institute, materials/curriculum for the institute, CGI training, and BookShop webinar. Thus far, this subgrantee requested and received a reimbursement of \$19,746.99 toward salary and benefits for the teachers during the professional development institute.

Dissemination activities (if applicable)		
Assisting other individuals with the planning and start-up of one or more new public school(s)	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> No concerns regarding use of funds in this category (explain below). <input type="checkbox"/> Unique uses of funds identified (explain below). <input type="checkbox"/> Specific guidance on this topic provided by the SEA to subgrantees (explain below). <input type="checkbox"/> Allowable, allocable, or reasonable use issues identified (explain below).
Developing partnerships with other public schools	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> No concerns regarding use of funds in this category (explain below). <input type="checkbox"/> Unique uses of funds identified (explain below). <input type="checkbox"/> Specific guidance on this topic provided by the SEA to subgrantees (explain below). <input type="checkbox"/> Allowable, allocable, or reasonable use issues identified (explain below).
Developing curriculum materials, assessments, and other materials that promote increased student achievement	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> No concerns regarding use of funds in this category (explain below). <input type="checkbox"/> Unique uses of funds identified (explain below). <input type="checkbox"/> Specific guidance on this topic provided by the SEA to subgrantees (explain below). <input type="checkbox"/> Allowable, allocable, or reasonable use issues identified (explain below).
Conducting evaluations and developing materials that document successful practices	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> No concerns regarding use of funds in this category (explain below). <input type="checkbox"/> Unique uses of funds identified (explain below). <input type="checkbox"/> Specific guidance on this topic provided by the SEA to subgrantees (explain below). <input type="checkbox"/> Allowable, allocable, or reasonable use issues identified (explain below).
Other uses of funds for dissemination	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> NA	<input type="checkbox"/> No concerns regarding use of funds in this category (explain below). <input type="checkbox"/> Unique uses of funds identified (explain below). <input type="checkbox"/> Specific guidance on this topic provided by the SEA to subgrantees (explain below). <input type="checkbox"/> Allowable, allocable, or reasonable use issues identified (explain below).

Sources: *March 2017 Draft Request for Applications*
December 2017 Draft Request for Application, CSP_RequestForApplication, CSP Grant Allowable Costs Guide, Subgrantee Application Narratives, SCPA PCR, SCPA 016829-10192017111320 (002), Aug15_2017_ViewPCRAttachment, Aug15_2017_PCR_ScreenShot, 41744.74-09252017090346, 016850 SWOP CSP PCR, Budget Modification History Log

Indicator 3.6: LEA DEDUCTIONS. The State ensures that the LEA does not deduct funds for administrative expenses or fees unless the eligible applicant enters voluntarily into an administrative services arrangement with the relevant LEA.

Table 3.6: LEA DEDUCTIONS.		
SEA efforts to ensure LEA deductions are appropriate.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
<p>Inform LEAs and subgrantees regarding the LEA’s ability to deduct administrative expenses or fees.</p> <p>Per the application, under Ohio State statute charter schools are defined as LEAs. As LEAs, they directly receive State and Federal funding.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).
<p>Ensure any deductions are mutually agreed upon and voluntary.</p> <p>Per the application, under Ohio State statute charter schools are defined as LEAs. As LEAs, they directly receive State and Federal funding.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).
<p>Identify and resolve concerns related to LEA deductions from grant funds.</p> <p>Per the application, under Ohio State statute charter schools are defined as LEAs. As LEAs, they directly receive State and Federal funding.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).

Sources: N/A

Indicator 3.7: TRANSFER OF STUDENT RECORDS. The SEA ensures that a student’s records and, if applicable, individualized education program (IEP) accompany the student’s transfer to or from a charter school in accordance with Federal and State law.

Table 3.7: TRANSFER OF STUDENT RECORDS.		
SEA efforts to ensure timely transfer of student records.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Inform LEAs and charter schools about their responsibilities to transfer student records, including IEPs.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: OCS staff reported that in the past authorizers have received training on issues related to starting a community school, which included discussion on transfer of student records, but these trainings are not currently occurring or planned. Authorizers receive the <i>Community School Suspension and Closing Procedures</i> document and are expected to articulate necessary information to the community schools under their purview. There was no evidence suggesting that OCS currently conducts any outreach to LEAs or community schools regarding records transfer. -- December 2017 site visit: No changes were observed during the December 2017 visit. While State law (ORC 3313.672), details LEA responsibilities for records transfer, ODE was not engaged in activities at the time of the site visit to inform LEAs and charter schools about their responsibilities to transfer student records.
Ensure student records, including IEPs, are transferred according to State laws and guidelines.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).

Table 3.7: TRANSFER OF STUDENT RECORDS.

SEA efforts to ensure timely transfer of student records.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>March 2017 site visit:</p> <p>While guidelines for transfer of records related to school closures exist, it appears that guidelines for transfer of records in other situations have not been developed. Agency-wide ODE is not permitted to house student records and the transfer of records occurs between LEAs. There is currently no mechanism for the OCS or ODE to verify that records, including IEPs, are transferred in a timely manner. Further, guidance for school closures delegates responsibility for records transfer to the authorizer.</p> <p>--</p> <p>December 2017 site visit:</p> <p>Due to statutory regulations in Ohio, OCS staff are not permitted to handle student records. Although OCS is available to support schools if needed, authorizers have primary responsibility for ensuring records transfer occurs as intended. Subgrantees noted that it can be difficult to obtain necessary records and school staff are often required to do extensive outreach, including having parents go to their child’s previous school to obtain records. One subgrantee described reaching out to their authorizer when difficulties arose and reported that the authorizer helped the school obtain necessary records. The remaining subgrantees did not reach out to their authorizer and instead attempted to obtain records on their own.</p>
<p>Intervene in transfer of student records, including IEPs, when records are not received.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> Not applicable</p>	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit:</p> <p>When delays in the transfer of student records arise and OCS intervention is necessary, OCS staff may work directly with community school staff, traditional school staff, and authorizers to facilitate the records transfer process. In cases where IEPs are delayed, the Office of Exceptional Children intervenes. OCS representatives noted that they have had to step in to resolve issues and these experiences have been successful thus far. In the case of school closures, authorizers are expected to have copies of all student records in case files are not successfully delivered.</p>

Table 3.7: TRANSFER OF STUDENT RECORDS.

SEA efforts to ensure timely transfer of student records.	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		-- December 2017 site visit: No changes were observed during the December 2017 visit.
Ensure that student records are appropriately transferred when a charter school closes.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable	<input type="checkbox"/> Implementing as proposed or necessary (explain below). <input checked="" type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: ODE has developed and disseminated guidance to be used if a community school is suspended or closed. This guidance places responsibility for ensuring transfer of student records in the hands of the authorizer. Authorizers are expected to ensure that original student records are returned to each student’s district of residence within 7 days of the school closure. Special education records are to be sent to the receiving school or school district’s special education administrators. When a school closes, the authorizer must complete a Suspension & Closing Assurance Form which confirms that records have been properly distributed. To encourage adherence to the guidance, Closure Process is an element in the <i>Authorizer Quality Practices Rubric</i> and authorizers are rated regarding their ability to carry out a closure process where records are transferred to home school districts in an orderly manner. While this is the case, it is unclear how OSC ensures appropriate transfer of student records during a school closure beyond delegating responsibility to the authorizer. -- December 2017 site visit: No changes were observed during the December 2017 visit.

Sources: *March and December 2017 Authorizer Quality Practices Rubric, Community School Suspension and Closing Procedures*

Indicator 3.8: RECORDKEEPING. All financial and programmatic records, supporting documents, statistical records, and other records of grantees and subgrantees related to the CSP grant funds are maintained and retained for grant monitoring and audit purposes.

Table 3.8: RECORDKEEPING.		
EDGAR regulations require grantees to:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
Maintain recordkeeping system and practices.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below). March 2017 site visit: The grantee maintains all grant files within their SharePoint, CCIP, and compliance systems. SharePoint houses all grant documents including the grant application, GANs, and correspondence with ED. CCIP currently houses the overall grant budget. When the subgrant application process begins, CCIP will house all subgrant applications and budgets. CCIP also maintains a history log capturing changes to CCIP files over time. The compliance system houses all documents obtained during compliance evaluations. All relevant staff have access to the information in these systems and staff can have access granted or revoked as staffing changes. -- December 2017 site visit: ODE continued to implement its recordkeeping system and practices as necessary at the time of the December 2017 visit. Subgrantees maintained all relevant records in appropriate formats including having hardcopy files and storing files electronically.
Follow records retention policy and practices.	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Not applicable	<input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).

Table 3.8: RECORDKEEPING.

EDGAR regulations require grantees to:	Implementation Issue?	Supporting Information Check appropriate box and add text to indicate promising practices, specific implementation issues, or changes to proposed activities.
		<p>March 2017 site visit:</p> <p>ODE adheres to Ohio Department of Administrative Services guidelines stating that files related to Federal grants must be retained until both State and Federal audits are complete, audit reports are released, and audit resolutions are issued or resolved. While this policy does not explicitly state that files will be retained for three years, conversation with legal staff during the site visit indicated that records are not destroyed until at least three years after the final audit is complete. While ODE has a records destruction process, no files in the CCIP system have been destroyed to date. In addition, according to the draft RFP, subgrantees will be expected to maintain all records for three years after the submission of the final report.</p> <p>--</p> <p>December 2017 site visit:</p> <p>ODE continued to follow the records retention policy described from the March 2017 visit. Subgrantees were aware of the need to retain their CSP records.</p>
<hr/>		
Sources:	<p><i>March 2017</i> <i>CSP Fiscal Management Plan, Draft Request for Applications</i></p> <p><i>December 2017</i> <i>CSP Fiscal Management Plan, Draft Request for Applications, CSP_RequestForApplication</i></p>	

Indicator 3.9: COMPLIANCE WITH GRANT CONDITIONS. The State has no significant compliance issues with Federal statutes, regulations, and the terms and conditions of the grant.

Table 3.9A: COMPLIANCE WITH GRANT CONDITIONS.		
SEA efforts to meet the terms and conditions of the grant.	Implementation Issue?	Detailed Information Provide a detailed narrative about the grantee’s approach.
<p>Comply with grant conditions and adhere to restrictions.</p> <p><input type="checkbox"/> Not applicable. The State does not have specific conditions placed on the grant.</p>	<p><input type="checkbox"/> Yes</p> <p><input checked="" type="checkbox"/> No</p> <p><input type="checkbox"/> NA</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input checked="" type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Progress has been made on several but not all specific conditions.</p> <p>See below for additional detail.</p> <p>--</p> <p>December 2017 site visit: ODE is complying with all high-risk specific grant conditions. ODE has completed hiring an independent monitor, forming an advisory committee, developing a Comprehensive Plan, developing a monitoring protocol, and making publicly available a charter school directory. Route payment, quarterly reporting, and ineligibility of dropout and recovery schools for subgrants are ongoing. The process for providing documentation of invoices for ED review is still being improved.</p> <p>See below for additional details.</p>
<p>Identify and resolve instances of noncompliance.</p>	<p><input checked="" type="checkbox"/> Yes</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> NA</p>	<p><input type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input checked="" type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p>

Table 3.9A: COMPLIANCE WITH GRANT CONDITIONS.

SEA efforts to meet the terms and conditions of the grant.	Implementation Issue?	Detailed Information Provide a detailed narrative about the grantee’s approach.
<input type="checkbox"/> Not applicable. The State does not have specific conditions placed on the grant.		<p>March 2017 site visit: Progress has been made on several but not all specific conditions.</p> <p>See below for additional details. --</p> <p>December 2017 site visit: Based on the October 2017 monitoring report, ED developed a corrective action plan for ODE addressing any monitoring indicator that was largely met, partially met, or not met. The corrective action plan included 13 items. ODE was able to address many of them by developing and gaining approval for key documents associated with the first subgrant competition (and also required by the High-Risk Specific Conditions), including the RFA, Comprehensive Plan, and monitoring protocol. Ten of the 13 items were satisfactorily resolved and closed by ED as of 12/4/2017. At the time of the December site visit, three items remained open as ED requested additional information and documentation from ODE. These relate to how an LEA can serve as a CMO; ODE’s processes for processing payments; and State guidance and processes related to transfer of student records. ODE responded to ED with additional information about these elements on December 20, 2017.</p>
<p>Ensure performance reports are timely and of acceptable quality.</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below). <input type="checkbox"/> Implementation issues identified (explain below). <input type="checkbox"/> Non-substantive changes in proposed activities (explain below). <input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Grantee submitted Annual Performance Reports and CSP Data Collection Forms in a timely manner. --</p> <p>December 2017 site visit:</p>

Table 3.9A: COMPLIANCE WITH GRANT CONDITIONS.

SEA efforts to meet the terms and conditions of the grant.	Implementation Issue?	Detailed Information Provide a detailed narrative about the grantee’s approach.
Ensure timely and reasonable access to grant records and key personnel for monitoring purposes.		<p>The grantee continued to implement this element as necessary and as described from the March 2017 site visit. In addition, grantee is complying with High-Risk Specific Condition 3, which requires quarterly reporting.</p> <p>See additional details below.</p>
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p><input checked="" type="checkbox"/> Implementing as proposed or necessary (explain below).</p> <p><input type="checkbox"/> Implementation issues identified (explain below).</p> <p><input type="checkbox"/> Non-substantive changes in proposed activities (explain below).</p> <p><input type="checkbox"/> Promising practice(s) identified (explain below).</p> <p>March 2017 site visit: Grantee provided timely and reasonable access to documents and personnel for the site visit.</p> <p>--</p> <p>December 2017 site visit: The grantee continued to implement this element as necessary and as described from the March 2017 visit.</p>

Sources: *March 2017 ED letter to ODE dated September 14, 2016; Grant Award Notification U282A150023 Action Number 4*
December 2017 Ohio High Risk Condition Gantt Chart updated 1.12.18, ODE Corrective Action Plan Tracker 12.20.17

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>High-Risk Specific Condition 1:</p> <p>ODE’s CSP SEA grant shall continue on route payment so that all payment requests are routed to the program office for approval prior to any funds being released. In addition, within 10 days of being notified of this condition and subsequently at least thirty days before the beginning date of each six-month budget period of the grant (October 1 and April 1), ODE must provide to the Department an itemized budget that the program office will review and approve, as appropriate. When a payment request is submitted in the G5 system, ODE must provide to the Department documentation of all expenditures and supporting evidence to justify the allowability of all costs included in the payment request. All requests shall be submitted to the Department in a timely manner and will allow for, at minimum, 48 hours turnaround time for program office review.</p>	<p>March 2017 site visit:</p> <p>Ohio’s current grant was awarded on September 28, 2015. On November 4, 2015, ED asked ODE to not draw down funds while ED conducted a supplemental review of ODE’s grant application. In a September 14, 2016 letter, ED informed ODE that the supplemental review was complete and the SEA may begin conducting activities under its CSP SEA grant, subject to High-Risk Specific Conditions and Specific Conditions in the GAN.</p> <p>Between July 2015 and October 2016, ODE revamped its authorizer evaluation process by convening an Independent Advisory Panel to make recommendations to improve the process, updating the authorizer evaluation process based on those recommendations, conducting the authorizer evaluations, and releasing the community school sponsor ratings. Throughout this period, ODE could not award subgrants until eligible sponsors were identified.</p> <p>At the time of the site visit, ODE had not drawn down any grant funds. All CSP SEA grant activities, such as developing the RFA and agreed-upon procedures and selecting an independent monitor, were paid in-kind with State funds. Therefore, the itemized budget and payment request process required of High-Risk Specific Condition 1 were not yet applicable. ODE will only use grant funds to cover the independent monitor and subgrant awards. Other administrative costs will continue to be paid in-kind by the State.</p> <p>--</p> <p>December 2017 site visit:</p> <p>ODE was complying with this condition at the time of the December 2017 site visit, but there were still process efficiencies and standardized documentation procedures that needed to be adopted by the grantee to streamline the route payment process.</p> <p>ODE started invoicing ED for grant payments to reimburse subgrant expenditures</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
	<p>in August 2017. ODE has submitted four requests to ED, not including one cancelled request. ODE conducts two internal reviews of subgrant expenditures before submitting to ED for approval. The OCS Grants Manager first reviews the request. If it is complete and allowable, it is sent to an external monitor in OSF for a detailed review of subgrantee invoices and to ensure the necessary, detailed documentation of expenditures is present. If the request passes both of these reviews, it is then submitted to ED for review and approval. Once ED approves, ODE’s CFO requests the draw from G5. To date there has been quite a bit of back and forth between ED and ODE before invoices have been approved to ensure requests are clear, allowable, and adequately supported with documentation. Procedures to improve the quality, consistency, and ease of documentation submitted to ED were still being developed at the time of the site visit.</p> <p>ODE’s grant budget was revised in October 2016 and again in Fall 2017. For the 2017 revision, ODE originally submitted a proposed budget to ED on September 1, 2017 and after multiple communications between ED and ODE to review and revise, it was approved by the ED program officer on November 1, 2017.</p>

High-Risk Specific Condition 2:

ODE shall hire an independent monitor approved by the Department to perform periodic agreed-upon procedures (AUPs) that address the major areas of program implementation risk, including monitoring the SEA and subgrantees. The independent monitor will be hired at least 30 days prior to publishing the first Request for Applications (RFA) under ODE’s CSP SEA grant. The scope of these AUPs will be developed by ODE in a process monitored by the Department. The Department will have direct, unfiltered access to the independent monitor and the records of the monitor, and the Department will require that any reports produced by the independent monitor be made available to the public. The independent monitor may be paid

March 2017 site visit:

ODE issued the Request for Competitive Sealed Proposals (RFP) for the independent monitor on January 31, 2017. The Department of Administrative Services posted the solicitation, answered questions, and received the sealed bids. Four offerors submitted proposals by the February 22, 2017 due date. A consensus meeting was held on February 28, 2017 to evaluate and score each proposal. The Department of Administrative Services planned to open the price proposals separately on Wednesday, March 1 but postponed the opening of the bids to allow time for negotiating with the offerors. For the purposes of meeting High-Risk Specific Condition 2, the date that ODE accepts the vendor’s contract will be considered the hire date for the independent monitor.

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>out of CSP SEA grants funds. The independent monitor will cost no more than \$250,000 per year.</p>	<p>The AUPs were developed by ODE in consultation with the Auditor of State and ED to guide the independent monitor’s review of the following high-risk areas: 1) Application & Selection of Subgrant Recipients, 2) Grant Recipient Claims and Payments, and 3) Monitoring and Performance. The AUPs will be finalized as part of the contract negotiations with the independent monitor.</p> <p>--</p> <p>December 2017 site visit:</p> <p>ODE completed the hiring process of the independent monitor using a competitive bidding process and selected the accounting firm of Kennedy Cottrell Richards. LLC (KCR). The engagement letter with AUPs was signed on May 31, 2017 by KCR, the Auditor of State, and ED. KCR issued its first report on August 14, 2017 based on the monitoring period of July 1, 2016 to June 30, 2017 with confirmatory findings of all elements reviewed. KCR’s next annual report will include monitoring CSO on its subgrantee monitoring (including desk reviews and onsite visits), subgrant reimbursement process, the second round of the subgrant competition, and other CSP processes.</p>
<p>High-Risk Specific Condition 3:</p> <p>ODE must submit to the Department quarterly performance reports (January 1, April 1, July 1, and October 1 of each year for the duration of the grant).</p> <p>a. The performance reports shall describe all grant activities and expenditures (capturing activity through the last day of the prior month), including the following information:</p> <ul style="list-style-type: none"> i. updates on grant project timelines; ii. updates on the timeline for implementing the Authorizer Quality Performance Review, and how the implementation status impacts the grant budget; and 	<p>March 2017 site visit:</p> <p>ODE submitted a quarterly performance report for the period of January 1, 2016 through September 30, 2016 on October 21, 2016 and the update on community school audit findings and resolutions and Appendix C were submitted on November 7, 2016, deadline extensions were approved by ED. ODE submitted the quarterly report for the period October 1, 2016 through December 31, 2016 on December 27, 2016. Each quarterly report included the updates on the project timeline, updates on the timeline of the Authorizer Quality Performance Review, and update on audit finds and resolutions.</p> <p>The semiannual performance report for July 1, 2016 through December 31, 2016 was submitted with the last quarterly report on December 27, 2016. There were</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>iii. updates on audit findings and resolutions of audits involving charter schools in Ohio including the authorizers’ responsibility and involvement.</p> <p>b. Semiannually (January 1 and July 1 of each year) the performance report shall also:</p> <p>i. include a report on all obligations, expenditures, revenues, and activities under the grant, including:</p> <ol style="list-style-type: none"> 1. a listing of the specific entities awarded CSP subgrants and the amount of those subgrants; 2. the authorizer of each subgrantee; 3. a description of the process by which subgrantees were selected for funding, including the criteria for evaluating subgrant applicants, and the scores and comments from subgrant competition peer reviewers; and 4. other information that the Department may determine is necessary to ensure public transparency and accountability regarding ODE’s CSP SEA grant program. <p>ii. be made available to the public and reviewed by the independent monitor under the agreed-upon procedures discussed in condition 2 above.</p>	<p>no obligations, expenditures, revenues, or activities paid for with grant funds to report.</p> <p>--</p> <p>December 2017 site visit:</p> <p>ODE submitted progress reports to ED in 2017 as follows:</p> <ul style="list-style-type: none"> • 4/14/2017 (2-week extension on delivery approved by ED): Quarterly performance report for January 1-March 31, 2017; High-Risk Condition Gantt Chart updated 3/30/2017; updated Appendix C (report on school audits) • 6/29/2017: Quarterly performance report for April 1-June 30, 2017; High-Risk Condition Gantt Chart updated 6/28/2017; updated Appendix C (report on school audits) • 9/29/2016: Quarterly performance report for July 1-September 30, 2017; High-Risk Condition Gantt Chart updated 9/12/2017; updated Appendix C (report on school audits) <p>All reports were accepted and approved by the ED program officer. In October 2017, ED approved a permanent shift in the due dates for these reports from the 1st to the 15th of the month.</p>
<p>High-Risk Specific Condition 4:</p> <p>ODE shall establish a Grant Implementation Advisory Committee (Advisory Committee). The Advisory Committee will consist of representatives from key stakeholder groups in Ohio such as nonprofits with relevant expertise in charter school authorizer quality; state charter school organizations; institutes of higher education with particular expertise in performance management; high-quality charter management organizations; and organizations that represent the interests of families with children in charter</p>	<p>March 2017 site visit:</p> <p>At the time of the site visit, the Advisory Committee had been established and the first meeting was planned for March 3, 2017. The Plan for the Ohio Grant Implementation Advisory Committee outlines the Advisory Committee’s scope of work, the members’ commitment, and the make-up of the committee membership. The Advisory Committee is made up of Ohio stakeholders including representatives from institutes of higher education, Ohio community school sponsor organizations, nonprofits with expertise in community school sponsor quality, policy organizations, and national organizations with expertise in community school oversight and quality.</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>schools. In addition, ODE may wish to include representatives of national organizations with expertise in charter school oversight and quality. ODE will create a charter for the Advisory Committee that sets forth roles, responsibilities, and membership, and includes rules that will address any potential conflict of interest issues; the charter will be subject to review and approval by the Department. The Advisory Committee shall not receive any compensation from ODE’s CSP SEA grant funds and shall be formed at least 30 days prior to ODE publishing the first RFA under ODE’s CSP SEA grant. The Advisory Committee will provide and ensure additional accountability with respect to the implementation of ODE’s CSP SEA grant, to include co-signing the semiannual reports produced as part of condition 3 above.</p>	<p>During interviews with the site visit team, ODE described the Advisory Committee’s scope of work. In addition to signing the semiannual reports, the Advisory Committee would also provide feedback on the RFA and the peer review process and may be convened quarterly to provide feedback throughout the implementation process.</p> <p>--</p> <p>December 2017 site visit: The Advisory Committee met on March 30, 2017, April 13, 2017, and September 29, 2017. The governance document reflecting the plan described above was adopted by the committee at its April meeting. The OCS Director described the group as a “helpful second set of eyes”. It reviews and approves the quarterly, annual, and semi-annual reports to ED, reviewed and provided feedback on the RFA, and raises questions and provides other feedback to OCS on the grant. He noted that OCS uses the committee in ways beyond those required in ED’s High-Risk Condition; for example, the committee provides more opportunities to get the word out about the grant and can review and advise on a range of documents and issues. Development of a grant Advisory Committee may be considered a best practice.</p>
<p>High-Risk Specific Condition 5:</p> <p>ODE shall develop a comprehensive plan for administering its CSP SEA grant effectively and efficiently for the duration of the grant’s performance period. This plan must be submitted for review and approval by the Department prior to ODE conducting a CSP subgrant competition and at a minimum, must describe the systems and processes ODE will implement for the following:</p> <p>a. authorizer evaluation and quality control, including an assurance that ODE will, in the context of designing the subgrant competition, awarding, and monitoring CSP subgrants, take into account:</p>	<p>March 2017 site visit: At the time of the site visit, ODE had not developed a comprehensive plan for administering its CSP grant. ODE stated that rather than one document there are numerous separate policies that address High-Risk Specific Condition 5 and as decisions are made they will be put into writing and may be reviewed by the Advisory Committee before being sent to ED for review and approval.</p> <p>The site visit team notes that the separate policies that address High-Risk Specific Condition 5 were not available for review at the time of the site visit. ODE had submitted the draft RFA to ED for feedback and the fiscal management plan was</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>i. the final authorizer ratings from the authorizer review process as well as, if appropriate, any additional information that reflects on authorizer performance; and</p> <p>ii. any additional information that may indicate increased risk when reviewing and monitoring compliance for an authorizer’s full universe of charter schools;</p> <p>b. subgrantee eligibility screening;</p> <p>c. the RFA process, including a copy of the RFA for review and approval by the program office prior to publication;</p> <p>d. the competitive subgrant awards process, including:</p> <p>i. pre-application training;</p> <p>ii. selection and training of reviewers;</p> <p>iii. budget reviews, internal screening, and risk assessment; and</p> <p>iv. award determination process;</p> <p>e. processing of subgrantee payments; and</p> <p>f. ensuring subgrantee adherence to all program requirements and the terms of their approved applications.</p>	<p>submitted to the site visit team for review, but the RFA process and the competitive subgrant award process were still in the developmental phase.</p> <p>--</p> <p>December 2017 site visit:</p> <p>Between the March 2017 site visit and the opening of the RFA competition, ODE completed the Comprehensive Plan and simultaneously, the RFA, Review and Award Process document, Notice of Grant Award, and other related documents. OCS coordinated the development of all of these documents with a large spreadsheet crosswalking grant requirements and needed actions to references in Federal and State documents and identification of each item for inclusion in the RFA, Comprehensive Plan, and other documents. OCS coordinated closely with ED to review the documents being developed and gain their approval. The RFA was approved by ED on April 5, 2017 and the Comprehensive Plan on May 17, 2017, with the notification from ED that ODE could then open its grant competition.</p> <p>The Comprehensive Plan provides a guide for the overall implementation of the grant and details processes required throughout the lifecycle of the grant. As completed and approved by ED, it contains sections on:</p> <ul style="list-style-type: none"> • Sponsor Evaluation and the Subgrant Competition (monitoring subgrantees and the sponsor evaluation) • Sponsor Evaluation and Quality Control • Subgrantee Eligibility Screening • Request for Application Process (request for application design, technical application development, applicant technical assistance, needs assessment advisory groups) • Competitive Award Process (review and award process/technical review checklist, subgrant application technical review, peer review scoring rubric, subgrant application peer review, score analysis, subgrant selection, award announcement)

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
	<ul style="list-style-type: none"> • Processing of Subgrantee Payments • CSP Subgrantee Adherence to Program Requirements (on-going fiscal monitoring, on-going monitoring by sponsors, fall desk review, spring site visit, annual grant activities report) • Corrective Action for Non-Compliance • Planning Evaluation Rubric • Implementation Rubric • The Department’s Compliance System • Annual Review and Update of the Monitoring Process and Protocols • The Department’s Adherence to Program Requirements (any special and high-risk conditions for the Ohio Grant (if applicable), quarterly, semi-annual and annual performance reports, grant implementation advisory committee, working with the U.S. Department of Education, independent monitor, semi-annual submission of itemized budget, ED site visits and monitoring corrective action plans (as applicable)) <p>As noted above, OCS has found the Comprehensive Plan extremely useful. Staff noted that it is a “go-to” document in guiding administration of the grant and was key to on-boarding the new Grants Manager. The OCS Director uses it as tool for what the program needs to do and as a way to hold the team accountable, and staff have plans for keeping it updated and using it in additional ways, such as to improve sponsor practices. Development of a Comprehensive Plan may be considered a best practice.</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>High-Risk Specific Condition 6:</p> <p>Prior to making any subgrant awards, ODE must develop a subgrantee monitoring protocol. At a minimum, the monitoring protocol must address financial accountability and include a risk rubric and timeline for conducting monitoring activities that will apply to all subgrantees for the duration of the grant. This subgrantee monitoring protocol must be reviewed and approved by the Department prior to ODE implementation. Department staff will be available to provide technical assistance to ODE, as necessary, to help ensure that ODE’s monitoring protocol establishes strong internal controls and mitigates areas of risk throughout the performance period of this grant.</p>	<p>March 2017 site visit:</p> <p>Ohio’s Public Charter School Subgrant Monitoring Protocol outlines a plan for monitoring CSP subgrantees in the following four areas: 1) Eligibility and ongoing monitoring of sponsor’s eligibility, 2) Monitoring and Performance of Subgrantees, 3) Corrective Action Plan (CAP), and 4) School Closure. According to the protocol, subgrantee monitoring will include desk and onsite reviews by OSC and Office of Grants Management staff. Desk reviews will occur throughout the grant period while onsite monitoring will occur in fall and spring for first-year recipients and in the fall only in subsequent years. All recipients of the CSP subgrant will be considered high-risk and will be subject to the same monitoring. The OSC desk reviews will include ongoing review of documents from the subgrantee (e.g., policies and procedures, quarterly reports, annual performance reports) and sponsor (e.g., monthly financial and enrollment reports). Onsite, monitors will review subgrantee financial transactions and policies and procedures, observe classrooms, confirm data collected to demonstrate progress toward program objectives, and interview stakeholders. The Office of Grants Management will approve cash requests, review and approve final expenditure reports, provide technical assistance for fiscal matters, and review audit reports.</p> <p>During interviews with the site visit team, ODE described its unified plan for subrecipient monitoring in which all Federal entitlement programs conduct onsite monitoring once per year. The process is the same regardless of what grant is monitored. ODE plans to include CSP into its unified subrecipient monitoring.</p> <p>The site visit team notes that the unified subrecipient monitoring described by ODE may not be sufficient for purposes of the grant as CSP monitoring goes beyond what is required for Title I or IDEA (e.g., lottery and admissions process, allowable costs, labeling equipment purchased with grant funds). Furthermore, the unified plan differs from the protocol provided to the site visit team. Finally, the site visit team notes that the current protocol is not a tool that would allow ODE to assess subgrantee performance and compliance.</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.

Provide detailed narrative about the grantee’s current approach.

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December 2017 site visit:

ODE completed development and received ED approval of its monitoring protocol in June 2017. In developing its protocol, ODE crosswalked the monitoring indicators with the various grant requirements (i.e., assurances, Federal guidance, Ohio’s performance measures, and AUPs) so that every indicator in the rubric aligns to a requirement that ODE must monitor to ensure subgrantee compliance. ODE also referenced other state’s monitoring rubrics in developing its protocol.

The monitoring rubric contains 33 indicators in the areas of:

- Program compliance
- Fiscal compliance
- Grant implementation
- Performance on goals and objectives
- Quality practices (implementation rubric only)

The monitoring protocol includes fall desk reviews and spring site visits annually and provides for corrective action plans as necessary. At the time of the site visit subgrantees were submitting data for the desk reviews. See Indicator 2.5 for more information.

High-Risk Specific Condition 7:

In consultation with the Department, ODE shall ensure it maintains and updates annually a centralized listing of all public charter schools that is easily accessible to the public—the listing will include the names of authorizers and show school performance under the state accountability framework as well as additional information that will help the public understand overall school performance (e.g., finance, operations, EMO relationships).

March 2017 site visit:

The Community Schools Directory available on the SEA website includes a list of public charter schools, authorizers’ names, a link to the Ohio School Report Cards landing page where stakeholders could search for a school’s report card, and a link to an Organization Search landing page where additional information about overall school performance could be searched.

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>High-Risk Specific Condition 8:</p> <p>ODE shall be prohibited from awarding any CSP SEA grant funds to dropout recovery charter schools until ODE has developed and received the Department’s approval on a plan to ensure that any subgrants to dropout recovery charter schools go to only schools that demonstrate the capacity to deliver a high-quality program and are authorized by the highest quality authorizers.</p>	<p>During interviews the site visit team, ODE acknowledged that the multiple landing pages was not the ultimate goal and expressed interest in developing a centralized listing that would meet the requirements for High-Risk Specific Condition 7.</p> <p>--</p> <p>December 2017 site visit:</p> <p>As a result of this high-risk condition, ODE undertook a project to design and add to its website a directory of community schools, sponsors, and operators. The project includes an interactive directory that allows parents and other users to easily find information about each school's location, educational focus, enrollment, sponsor, operator, five-year forecast, and Ohio School Report Card. Directories of these data elements for all community schools are also available in Excel spreadsheet format from links provided on the page. At the time of the site visit, while the data lists were public, the interactive directory had not yet gone live due to technical problems with including the 5-year forecasts for each school. The centralized listing was posted publicly on December 14, 2017.</p> <p>March 2017 site visit:</p> <p>ODE does not intend to include dropout prevention and recovery schools as eligible subgrant applicants. The Notice of Grant Opportunity dated February 15, 2017 expresses this intention with the note, “Please note: Dropout Prevention and Recovery schools are not eligible for funding during this application cycle. Similarly, eSchools are not eligible for funding by the Ohio CSP subgrant.” The grantee will submit notification to ED in writing regarding their intent to exclude dropout prevention and recovery schools for the duration of the grant.</p> <p>--</p> <p>December 2017 site visit:</p> <p>No change observed from the March 2017 site visit. The April 2017 RFA (p. 6) states that dropout prevention and recovery community schools as defined in Ohio statute, as well as e-schools as defined in Ohio statute, are ineligible applicants for the subgrant.</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>Specific Condition 1 (revised from September 28, 2015 Grant Award Notification):</p> <p>Given the time necessitated to conduct our supplemental review, the Department will work with ODE to revise ODE’s CSP SEA grant budget. As of now, grant funds in the amount of \$32,671,373 have been awarded and this includes funding in the amount of \$7,118,964 for FY 2015, \$13,886,625 for FY 2016, and \$11,665,784 for FY 2017. Additional funding for continuations may be modified by the Department over the duration of the five-year grant based on ODE’s performance and compliance with the specific conditions. ODE may not obligate or disburse funds designated for future fiscal years until the start of that fiscal year. ODE must track funds and activities separately for each of the three fiscal years that have already been awarded. Consistent with the current grant budget, for FY 2016, ODE will be awarded an additional \$1, and for FY 2017, ODE will be awarded the remaining continuation funds for FY 2017, contingent on satisfactory grant performance. FY 2018 and FY 2019 continuation funding is contingent on overall grant performance.</p>	<p>March 2017 site visit: ODE has controls in place to ensure it does not spend more grant funds than allowed in each fiscal year and systems to track funds and activities separately. However, this specific condition is largely irrelevant because no grant funds were spent in Year 1 and Year 2 spending will not exceed the award. On October 1, any unobligated funds will automatically carry over to the next year and become Year 3 dollars and ODE will have access to the entire \$32M. ED is no longer concerned that ODE will overspend Year 1 or Year 2 grant funds. However, the site visit team notes that the dollars awarded in FY15 have a limited shelf-life and will revert to the Treasury if unused within five years.</p> <p>--</p> <p>December 2017 site visit: ODE’s grant budget was revised in October 2016 and again in Fall 2017. For the 2017 revision, ODE originally submitted a proposed budget to ED on September 1, 2017, and after multiple communications between ED and ODE to review and revise, it was approved by ED on November 1, 2017. Currently, the total grant award over five years is \$49,380,957. After a Year 1 award of \$32,671,373, ODE was awarded \$1 in each of Years 2 and 3. For Year 4 \$1 is budgeted and for Year 5 \$16,709,581 is budgeted. The grantee had not exceeded its grant budget for any year to date.</p>
<p>Specific Condition 2 (GAN):</p> <p>The total recommended award amount of \$71,058,319 is an estimate based on the subgrant projections included in the approved application. The Department reserves the right to reduce continuation amounts based on performance, including actual need for additional funding. ODE should consider the possibility of a reduction in continuation funding when incurring administrative costs.</p>	<p>March 2017 site visit: ODE conservatively estimated the number of subgrants that may be awarded in the current budget period and planned to allocate less than 5 percent to administrative costs. ODE has elected to use administrative funds solely to cover the cost of the independent monitor and is not charging rent, salaries, or other expenses to the grant. At the time of the site visit, the CFO indicated that \$110,000 had been allocated but spending will not occur until July 1.</p> <p>--</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>Specific Condition 3 (GAN):</p> <p>ODE shall ensure that the Authorizer Quality Performance Review system continues to include periodic review and evaluation, at least once every five years, throughout the life of the grant. Although the Authorizer Quality Performance Review system will look at periodic review and evaluation, it is not clear that effective authorizer ratings require this element to be met. Therefore, ODE shall ensure that an authorizer that is not performing periodic reviews and evaluations as required by Absolute Priority 1 will be designated ineffective for purposes of the CSP program and that no subgrants will be awarded to charter school developers with charter schools authorized by an authorizer rated as ineffective.</p>	<p>December 2017 site visit: ODE’s request for a revised grant budget included new projections of eligible subgrant applicants. The original estimate to fund 127 subgrantees over five years was reduced to approximately 68 subgrantees. The total grant award was reduced from \$71,058,319 to \$49,380,957.</p> <p>March 2017 site visit: Although ODE requires authorizers to conduct reviews of charter schools at least twice a year, those reviews do not meet ED’s requirements for periodic review and evaluation which needs to be a meaningful high-stakes review that could result in the authorized public chartering agency taking appropriate action or imposing meaningful consequences on the charter school, if necessary. ED is concerned that such reviews may not take place at least once every five years for charter schools with terms that exceed five years. At the time of the site visit, ODE could not demonstrate that authorizers that are not performing periodic reviews and evaluations at least once every five years are designated as “Ineffective” in the sponsor evaluation process and no subgrants will be awarded to developers with agreements with those authorizers.</p> <p>--</p> <p>December 2017 site visit: In order for a sponsor’s schools to be eligible for the CSP grant, the sponsor must receive an overall rating of Effective or Exemplary on the sponsor evaluation and meet or exceed (scoring a 3 or higher) on the “Oversight and Evaluation: Site Visit Reports” and “Termination and Renewal Decision-making: Renewal and Non-renewal Decisions” standards in the Sponsor Quality Practices Rubric. See Indicator 2.1 for additional information.</p>
<p>Specific Condition 4 (GAN):</p> <p>ODE’s proposed definition of high-quality charter school is approved for use for purposes of this CSP SEA grant with the following conditions:</p>	<p>March 2017 site visit: During interviews with the site visit team, ODE could not articulate a plan for using its definition of high-quality charter school in relation to the CSP grant. However, ODE’s approved definition of high-quality charter school must be used anytime such schools are referenced in the grant application.</p>

Table 3.9B: COMPLIANCE WITH GRANT CONDITIONS Specific Conditions. Detailed Information.

Approach to ensuring that specific or high risk conditions of the grant are met.	Provide detailed narrative about the grantee’s current approach.
<p>a. ODE must use its definition of high-quality charter school when designating charter schools as high-quality in relation to the CSP SEA grant; and</p> <p>b. ODE must be able to demonstrate that any charter school that ODE designates as a high-quality charter school for purposes of this CSP SEA grant has no significant compliance issues. Per the standards described in ODE’s approved application, this would be demonstrated through evidence that:</p> <ul style="list-style-type: none"> i. the charter school is in good standing with its authorizer; and ii. audits of the charter school conducted by the State Auditor or other independent auditor do not identify any significant compliance issues. 	<p>Every charter school has a compliance review every year which is reviewed as part of the sponsor evaluation process. A vendor was contracted to conduct sponsor compliance reviews for ODE. The vendor reviews each sponsor’s compliance with applicable rules and laws and randomly selects 10 percent of the sponsor’s schools for a similar compliance review. The program office reviews each school’s compliance review but needs to formalize the process.</p> <p>--</p> <p>December 2017 site visit:</p> <p>ODE’s April 2017 RFA encourages applicants to consider a community school model with a track record of high-quality academic performance and specifies performance measures that are used to identify a high-performing community school model for the purposes of Ohio’s CSP grant. These performance measures for high quality are the same that the State applies to all schools and uses in identifying schools for best practices. However, ODE’s reference to high-quality charter schools in the RFA does not include details about needing to be in good standing with the authorizer and not having any significant compliance issues.</p>
<p>Specific Condition 5 (GAN):</p> <p>Prior to approving the use of weighted lotteries by charter school subgrantees under CSP grant award (U282A150023), ODE must submit current information that demonstrates that State law permits the use of weighted lotteries consistent with applicable Federal laws and regulations, and ODE must receive approval from the Department to move forward. For guidance on how ODE can demonstrate that State law permits the use of weighted lotteries taking into account educationally-disadvantaged students, please see section E of the CSP Nonregulatory Guidance that is available at http://www2.ed.gov/programs/charter/legislation.html</p>	<p>March 2017 site visit:</p> <p>ODE does not intend to seek approval for the use of weighted lotteries by charter school subgrantees under this CSP SEA grant. The grantee will submit notification of this intent to ED in writing.</p> <p>--</p> <p>December 2017 site visit:</p> <p>No changes were observed during the December 2017 visit; ODE was not allowing subgrantees to use a weighted lottery and did not intend to seek approval for this option.</p>

Sources: *March 2017* ED letter to ODE dated September 14, 2016; Grant Award Notification U282A150023 Action Number 4; ODE website, Ohio's Public Charter School Subgrant Monitoring Protocol; Notice of Grant Opportunity dated 02/15/17; Plan for the Ohio Grant Implementation Advisory Committee; RFP for Community School Program (CSP) Independent Monitor; Quarterly Performance Reports; Semiannual Performance Report; draft Request for Applications; draft Agreed-Upon Procedures; Community School Sponsor Evaluation Update Memo

December 2017 Emails between ODE and ED on invoices; September 1, 2017 email from ODE to ED with proposed budget revision; November 1, 2017 from ED to ODE approving budget revision; Kennedy Cottrell Richards engagement letter (May 31, 2017); Independent Accountant's Report on Applying Agreed-Upon Procedures (August 14, 2017); ODE Progress Reports submitted to ED on 4/14/2017, 6/29/2017, and 9/29/2016; email from ED to ODE approving shift in quarterly reporting dates from 1st to 15th of month (October 2017); Ohio Grant Implementation Advisory Committee meeting minutes from March 30, 2017, April 13, 2017, and September 29, 2017; Governance Document for the Ohio CSP Grant Implementation Advisory Committee; Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017); Ohio CSP Grant Administration Comprehensive Plan; Ohio's CSP Subgrant Review and Award Process, Notice of Grant Opportunity, 2018 Ohio Charter Schools Program Sub-Grant Competition; CSP Grant Requirements Crosswalk; 4/5/17 email from ED to ODE approving RFA; 5/17/17 email from ED to ODE approving Comprehensive Plan; Charter School Program Grant Monitoring Rubrics; Indicators in the Rubric Spreadsheet; 6/28/2017 email from ED to ODE approving monitoring protocol; Directory of Community Schools, Sponsors and Operators; Ohio High Risk Condition Gantt Chart updated 1.12.18; Grant Award Notification Action Number 8; Budget Reduction Memo for FY17 NCC Slate

4. OVERSIGHT OF CHARTER SCHOOL AND MANAGEMENT ORGANIZATION RELATIONSHIPS

This section of indicators is provided to assist SEAs to assess their own policies, practices, and procedures to ensure that charter school and management organization conditions do not promote the risks identified in the *Nationwide Assessment of Charter and Education Management Organizations Final Audit Report, ED-OIG/A02M0012, September 2016* as it pertains to CSP funds. Additionally, this section of indicators is intended for SEAs to use when requesting information from the CMOs and EMOs in their state, such as data submitted through the U.S. Department of Education *EDFacts* submissions. These indicators were added as part of FY2018 monitoring; the following tables therefore only contain data based on the December 2017 site visit.

- Monitor the relationships between charter schools and management organizations, including financial risk, lack of accountability over public funds, and performance risks
- Ensure accurate, complete, and reliable charter school data collected for *EDFacts* data files

Indicator 4.1: MITIGATING RISK OF CHARTER SCHOOL RELATIONSHIPS WITH MANAGEMENT

ORGANIZATIONS. The SEA monitors charter schools and their management organizations to mitigate risks associated with those relationships, with respect to 1) financial risk; 2) accountability over federal funds; and 3) performance risk.

Table 4.1: Mitigating Risk of Charter School Relationships with Management Organizations

Risk Area	Are policies, practices, or procedures in place?	Summary How does the SEA monitor, assess, and mitigate risk between charter schools and management organizations?
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Operating Responsibilities: How does the SEA ensure the relationships between charter school and their management companies mitigate risk?		
<i>Fiscal authority</i> – charter school boards should not cede fiscal authority to management organizations	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>December 2017 site visit:</p> <p>As part of the subgrant application process, ODE requires that subgrantee applicants ensure and attest that any management organizations “remain at ‘arm’s length’ and [have] no involvement with the administration of the subgrant (see B-13 in the Federal CSP Nonregulatory Guidance dated January 2014).”</p> <p>To assess these relationships, the subgrant application process requires applicants to submit any contracts they have executed with a management organization for review. The terms of these operator contracts vary widely across charter schools. ORC 3314.024 requires that a management organization which receives more than 20 percent of a charter school’s annual gross revenues must provide a detailed breakdown of the cost of goods and services it provides (a review of operator contracts found some contracts which stipulate as high as a 97 percent continuing fee of school revenues). Anything below the 20 percent threshold does not require this level of detail and therefore makes it more challenging to compare the relative cost and value of operators across charter schools.</p> <p>Of the current subgrantees, all administer the CSP subgrant directly. However, outside of the CSP subgrant, management organizations at two of the charter schools hold fiduciary duties for the schools, carrying out the day-to-day implementation of financial policies and procedures. This variation in management organization involvement and control of financial operations may increase the potential for risk of abuse with funds. While the State has procedures in place to ensure fiscal authority is maintained by charter school boards, it is not clear that these procedures are sufficient to mitigate risk.</p>

Table 4.1: Mitigating Risk of Charter School Relationships with Management Organizations

Risk Area	Are policies, practices, or procedures in place?	Summary How does the SEA monitor, assess, and mitigate risk between charter schools and management organizations?
<p><i>Accountability over public funds</i> – recipients are required to have internal controls to properly account for and spend Federal and other public funds</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>December 2017 site visit: As part of the application process, subgrantees agree to use funds in accordance with applicable Federal and State laws and plans and agree to administer CSP funds in compliance with those provisions. They are also required to maintain records for three years following completion of the grant (per 2 CFR 200.333), including details on the amount of funds and how they were used. Finally, applicants must assure that they will have effective financial management systems which conform to the standards present in 2 CFR 200.302, which stipulates the ability to report financial data using means that verify compliance with program regulations and maintain effective internal control over the operations of the approved grant.</p>
<p><i>Performance risk</i> – charter school boards should not cede operational authority to management organizations</p>	<p><input type="checkbox"/> Yes <input checked="" type="checkbox"/> No</p>	<p>December 2017 site visit: There is wide variation in the extent of operational authority charter schools have ceded to management organizations. Among the current CSP subgrantees, hiring is controlled by the management organization in all cases, though school personnel are considered employees of the charter schools in two of these cases (school employees –i.e., teachers and principal—are considered management organization staff at the third charter school). While the board still has the authority to make the final employment determination in these cases, its ability to oversee operations may be hindered by affording the management organization so much latitude. Cases where school staff are considered management organization employees raises concerns about how ODE is ensuring all educators are public school teachers and adhering to State requirements. This ceding of authority is also often an issue with regard to ownership of assets and intellectual property. For two of the subgrantees (and numerous other charter schools in a broader review of operator contracts), operator contracts give ownership of all curricular and intellectual property assets to the management organization. This poses a challenge to charter school autonomy and sustainability should the charter school decide to form a relationship with a different management organization. With regard to CSP, processes are not currently in place to ensure these types of assets are not purchased with CSP funds, as both tangible and intangible uses of CSP funds must remain in the public domain.</p>

Table 4.1: Mitigating Risk of Charter School Relationships with Management Organizations

Risk Area	Are policies, practices, or procedures in place?	Summary How does the SEA monitor, assess, and mitigate risk between charter schools and management organizations?
Internal Controls: How does the SEA ensure that a charter school’s internal controls are sufficient to mitigate risk?		
<i>Conflict of interest (COI) policies</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>December 2017 site visit: ODE requires subgrant applicants to submit their conflict of interest policy with the subgrant application. For current subgrantees, these policies detail that board members must disclose any existing conflicts of interest, recuse themselves from dealings related to a COI, and avoid apparent and actual conflicts of interest as outlined in EDGAR 34 CFR 75.525. Additionally, subgrantees assure that they will also abide by COI policies as detailed in 34 CFR 75.525 as well as with all Ohio statues and administrative rules pertaining to COI.</p> <p>Monitoring of community schools is largely the responsibility of sponsors. The types of review sponsors conduct are not likely to identify breeches to COI policy. Monitoring by ODE of subgrantees had not yet occurred at the time of the December 2017 visit. There was no indication that ODE had provided sponsors guidance on assessing and addressing COI violations.</p>
<i>Segregation of duties policies</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>December 2017 site visit: Few sponsor contracts or management contracts detail policies for segregation of duties. ODE did not have processes in place to monitor or examine schools’ internal controls in this area.</p>
<i>Related-party transactions</i>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>December 2017 site visit: Sponsor contracts and board COI policies prohibit related-party transactions on the part of board members or school personnel. However, no such prohibitions are applicable to employees of management organizations. Given the close ties management organizations have with schools, this could pose a risk to charter school operations.</p> <p>ODE requires subgrant applicants to state how agreements with management organizations were formed and whether it was an arms-length agreement, but a review of responses on the CMO/EMO Questionnaire suggests the role of management organizations in the formation of the schools is underrepresented. School leaders at all of the subgrantees had previously worked with or for the management organization, and board members at two of the three schools had prior relationships with management organization employees or with a different charter school that was also managed by that organization.</p>

Table 4.1: Mitigating Risk of Charter School Relationships with Management Organizations

Risk Area	Are policies, practices, or procedures in place?	Summary How does the SEA monitor, assess, and mitigate risk between charter schools and management organizations?
Financial Risks: How does the SEA ensure that charter school and management company policies do not pose a financial risk?		
<p><i>Waste, fraud, and abuse</i> – recipients must maintain policies that ensure against the waste, fraud, or abuse of public funds</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>December 2017 site visit: Much responsibility for preventing waste, fraud, and abuse rests with sponsor reviews, which ODE has little influence over. However, in order to receive a CSP subgrant, applicants must have support from their sponsor, who in turn must sign subgrant assurances on how they will uphold the purpose of the grant and oversee the subgrantee. As part of these assurances, the sponsor agrees to monitor the community school’s compliance with all laws applicable to the school and terms of the contract. Should the school be found to have issues of noncompliance or unresolved audit findings, the sponsor must take steps to intervene in the school’s operation to address and correct those issues.</p> <p>A second procedure that helps mitigate waste, fraud, and abuse of CSP funds is a result of a condition placed on ODE’s CSP grant. The route payment condition requires that all subgrantees must submit a PCR with proper documentation to obtain reimbursement from ODE. ODE staff review each PCR prior to processing the payment to ensure the allocability, allowability, and reasonableness of the CSP expenses. While not a voluntary process adopted by ODE, the effect of this detailed review of subgrant expenses is to reduce the potential for waste, fraud, or abuse of CSP funds.</p>
<p><i>Procurement standards</i> – recipients must use their own procurement procedures that reflect applicable state and local laws, provided that procurements conform to applicable Federal law</p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>	<p>December 2017 site visit: As part of the application process, subgrantees must agree to utilize competitive bidding practices in compliance with applicable procurement regulations. Additionally, the subgrant assurances state that a subgrantee must comply with the procurement standards set forth in the U.S. Department of Education’s regulations which require Federal subgrant recipients to develop written procurement procedures and to conduct all procurement transactions “in a manner to provide, to the maximum extent possible, open and free competition. No employee, officer or agent of the community school may participate in the selection, award or administration of any contract supported by federal funds if a real or apparent conflict of interest exists.”</p>

Table 4.1: Mitigating Risk of Charter School Relationships with Management Organizations

Risk Area	Are policies, practices, or procedures in place?	Summary How does the SEA monitor, assess, and mitigate risk between charter schools and management organizations?
<p><i>Management organization contracts</i> – management contracts should ensure that governing boards retain control over funds and operations</p>	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<p>December 2017 site visit: As detailed above, a review of operator contracts shows wide variation in the extent of control governing boards retain over charter school funds and operations. These types of contracts raise questions about the extent of internal controls charter schools have in place to ensure proper oversight and management of grant funds and operations. Among the current CSP subgrantees, all technically held control and oversight of both financial and operational aspects of the charter schools. In practice, the management organization contracts afforded operators a great deal of control, from financial, to facilities, to hiring, to the educational plan. Contracts used suggestive language in reference to board authority rather than definitive statements (e.g., “[t]he Board may make final decisions on matters related to the operation of the school”). ODE expects these types of relationships to decline over time. With the provisions afforded the State under HB2, ODE must now provide operator rankings, which they expect will strengthen quality overall.</p>
<p><i>Misuse of funds</i> – recipients of Federal and other public funds are required to ensure they have internal controls to prevent putting funds at risk for misuse</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>December 2017 site visit: ODE requires subgrantees to manage grant funds according to project aims and all relevant statutes and policies. Additionally, in accepting grant funds, the subgrantee agrees that ODE has the authority to take administrative sanctions, including revoking or terminating grant funds, as necessary if applicable laws or assurances are not being met, as allowed under 2 CFR 200.338, 34 CFR 74.62 and Ohio Revised Code Section 3301.07 (C). ODE also provides guidance to subgrantees in the Fiscal Management Plan on allowable expenses to prevent misuse at the outset of awards.</p>
<p>Federal Funding Sources: Can the SEA connect and track each charter school in the State to each Federal-funding source?</p>		
<p>Title 1 Formula grant: --Improving Basic Programs Operated by Local Educational Agencies (<i>Catalog of Federal Domestic Assistance 84.010</i>)</p>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<p>December 2017 site visit: All Federal pass-through grants and State grants are viewable in CCIP. The system maintains records back to 2010. Users can view drawdowns, carryover, and other grant-related transactions based on their user-status in CCIP. CCIP is a grant-based system, meaning information is stored by grant rather than school or other entity. As such, it is possible to investigate which entities receive which grants but not immediately possible to track what grants a particular school receives. To examine school-based relationship requires additional manipulation of the data outside of CCIP. Title 1 grants are viewable in this system.</p>

Table 4.1: Mitigating Risk of Charter School Relationships with Management Organizations

Risk Area	Are policies, practices, or procedures in place?	Summary How does the SEA monitor, assess, and mitigate risk between charter schools and management organizations?
SIG Formula grant: --School Improvement Grants (<i>Catalog of Federal Domestic Assistance 84.377</i>)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: ODE can connect and track SIG Formula grants to charter schools in CCIP.
IDEA Formula grant: --Individuals with Disabilities Education Improvement Act of 2004, Part B (<i>Catalog of Federal Domestic Assistance 84.027</i>)	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: ODE can connect and track IDEA grants to charter schools in CCIP.
CSP Discretionary grants: --State Entity Grants (Catalog of Federal Assistance 84.282A) former State Educational Agency (SEA) under NCLB --Non-State Entity Grants (Catalog of Federal Assistance 84.282B) former Non-State Educational Agency Grant under NCLB --CMO Grants, Charter School Replication and Expansion Grants (Catalog of Federal Domestic Assistance 84.282M)	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	December 2017 site visit: Current and prior SEA CSP grants are trackable in CCIP. However, as the system only tracks Federal pass-through and State grants, individual CMO or Non-SE CSP grants are not viewable in CCIP. CCIP is currently structured as a risk-based grant system. ODE hopes to transition in the next few years to a system that allows for the organization of data by entities in addition to grants (e.g., a school, a district, a sponsor).

Sources: December 2017 *Ohio-Monitoring-Rubric, ORC 3314, Statement of Sponsor Assurances, Subgrant Statement of Assurances, Review of Subgrant Applications, Review of Sponsor Contracts, Review of Operator Contracts, Ohio-CSP-Grant-Comprehensive-Plan, CSP Fiscal Management Plan, Charter Management Organization/Education Management Organization (CMO/EMO) Questionnaire, 3.4 Administration of CSP Funds Nov 2017, Indicator 3.5 Use of CSP Funds*

Indicator 4.2: OVERSIGHT OF EDFACTS DATA COLLECTION FOR MANAGEMENT ORGANIZATIONS. The SEA ensures accurate, complete, and reliable charter school data is collected for ED*FACTS* data files.

Table 4.2: OVERSIGHT OF EDFACTS DATA COLLECTION FOR MANAGEMENT ORGANIZATIONS

ED<i>FACTS</i> Files	Is this data currently collected throughout the state?	Summary What, if any, are the existing data sources for these elements? How is the SEA collecting and reporting this data?
C190 — Charter Authorizer Directory: Can the State connect each charter school in their State to the authorizers from the Charter Authorizer Directory?		
<i>C190 - Can the state connect each charter school in the state by type of authorizer from the Charter Authorizer Directory? (ED<i>FACTS</i> data collection, Charter Authorizer Directory, file spec C190)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: ODE requires sponsors to submit and maintain data for the C190 file in the Ohio Education Directory System (OEDS). ODE staff review and approve the charter school data submitted by sponsors annually. This approved data is then pulled by the IT department to form the ED <i>FACTS</i> file for submission.
C196 — Management Organizations Directory: Does the State collect the following information on all CMOs and EMOs that operate charter schools?		
<i>Management Organization Name</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: Data on management organizations was not previously collected by ODE. In order to obtain this data, ODE administered a survey to school directors and treasurers that collected data on both operator characteristics and relationships with schools. Survey data was reviewed, validated, and followed up on by ODE staff to ensure a 100 percent response rate and complete information.
<i>Organization Employer Identification Number (EIN)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: EINs were collected through the survey described above.
<i>Organization address location</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: Operator physical locations were collected through the survey.
<i>Organizations address mailing</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: Operator mailing addresses were collected through the survey.
<i>Organization management type (i.e., for profit, not-for profit, other)</i>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	December 2017 site visit: Management type was identified by survey respondents. ODE is planning to embed these elements into OEDS to avoid the significant burden of survey administration in future years.

Table 4.2: OVERSIGHT OF EDFACTS DATA COLLECTION FOR MANAGEMENT ORGANIZATIONS

C197 — Crosswalk of Charter Schools to Management Organizations: Can the State connect the charter schools in their state to the management organizations from the Management Organization Directory described above (FS196)?

C197 — Crosswalk of Charter Schools to Management Organizations Yes December 2017 site visit:
 No ODE did not previously have a complete record of the connections between charter schools and operators. The linkages were established by schools’ responses to the survey described above. Going forward, ODE plans to integrate these elements into OEDS so schools can maintain current information on an ongoing basis.

C198 — Charter Contracts: Does the State assign and record a unique identification number to the contract (or charter) that authorizes the charter school to operate in the State under the State’s charter school legislation? Does the State collect the approval and renewal dates of such contracts?

C198 — Charter contract ID number Yes December 2017 site visit:
 No This was a new data element for the State. To create the element, ODE concatenated the school’s IRN, the sponsor’s IRN, and the contract start date.

C198 — Charter contract approval date Yes December 2017 site visit:
 No This element was already collected by ODE and is updated annually when contract renewals come in during June.

C198 — Charter contract renewal date Yes December 2017 site visit:
 No The same process was followed as for contract approval date.

Data Validation

Data Validation—Can the State validate charter school data submitted to ED Facts in file spec (FS) C029-Directory? Yes December 2017 site visit:
 No ED Facts data for the 2016-17 school year was not yet publicly available to independently validate the quality of charter school data submitted to ED Facts. ODE staff reported working iteratively on the charter school data submission to ensure the files were formatted correctly and contained the correct information. An internal validation process was also in place whereby ODE staff cross checked the information to make sure it aligned across different sources. Data also went through a review by the legal team, who verified through the Secretary of State website that schools, operators, and sponsors were valid legal entities. ODE was late with its 2016-17 ED Facts submission due to the extent of effort required to collect and validate these new data elements.

Sources: December 2017 Community-School-Directory, Operators Public List

APPENDIX A DATA COLLECTION PROCESS AND METHODOLOGY

The CSP Monitoring Plan is being conducted with the assistance of WestEd (Contract # ED-CFO-10-A-0074). The plan assesses grantee performance and compliance using indicators based on Federal statute, EDGAR, non-regulatory guidance, and application requirements. A monitoring handbook was provided to the grantee in advance of the site visit and used to guide the monitoring process. The monitoring handbook specifies each monitoring indicator, its statutory or other sources, criteria for meeting each indicator, guiding questions, and acceptable evidence.

In conducting this comprehensive review, the site visit team carried out a number of major activities. These included:

- Reviewing key background documents provided by ED on the State’s CSP grant, including the grant application, grant award notice, and annual performance reports
- Researching and synthesizing other available information about the State grantee’s charter school program including relevant statutes; reports and evaluations; newspaper articles; and other data from government, research, and advocacy organizations
- Consulting with ED prior to the site visit about issues of specific concern in the State grantee’s administration of the CSP
- Arranging the site visit in coordination with State and charter school officials to identify State officials for interviews and select subgrantees to visit
- During the site visit interviews, collecting evidence of the State grantee’s compliance or performance with respect to each indicator. Materials and artifacts were collected from the grantee to document compliance with Title V, Part B Public Charter Schools Program statutes, regulations, and guidance
- Analyzing the evidence obtained and collecting any follow-up information necessary to produce this report

Two monitoring visits to Ohio occurred in 2017. The first site visit was conducted over a three-day period from February 27 to March 1, 2017. The site visit team met with members of the Ohio Department of Education (ODE) including members of the Office of Community Schools (OCS), Executive Director of the Center for Student Support and Education Options, Executive Director of Federal and State Grants Management, Assistant Director of the Office of Federal Programs, Chief Legal Counsel, Assistant Legal Counsel, and Chief Financial Officer. The team did not visit subgrantee schools as a part of this site visit because no schools were funded at the time of the visit.

The second site visit occurred from December 5-8, 2017. The site visit team again met with members of ODE, including members of OCS, the Executive Director of the Center for Student Support and Education Options, the Executive Director of Federal and State Grants Management, the Assistant Director of the Office of Federal Programs, and the Chief Financial Officer. As the first subgrant competition was completed between visits, the team also visited all three current subgrantees:

- *United Preparatory Academy East*: A Thomas B. Fordham Foundation-authorized school designed for grades K–5 that provides a college-prep education for underserved students of Columbus. The school opened in the 2017–18 school year and was awarded CSP implementation funds. At the time of the site visit, the school served 48 students in two Kindergarten classrooms.
- *South Columbus Preparatory Academy*: The school opened in the 2017–18 school year. At the time of the visit, the school served 79 students in grades K–4. The school is designed to serve 400 students in grades K–8, utilizing a curriculum model and philosophy that has been successful at three other schools in the state. The school was awarded CSP implementation funds.
- *Southwest Ohio Preparatory School*: As with the other subgrantees, the mission of this school is to prepare students for college and create a culture of high expectations. The school opened in the 2017–18 school year, serving grades K–8. At the time of the visit, 236 students were enrolled. The school was awarded CSP implementation funds.

At the three subgrantees, the site visit team interviewed school leaders and Treasurers. At select sites, the team also interviewed operator representatives, board members, a parent, and consultants.

After the visit, the site visit team and the grantee engaged in follow-up data collection to clarify unanswered questions and request additional information.

This report is an analysis and assessment of the data, grant award documents, interviews, and information gathered prior to, during, and following the December 2017 site visit to the State grantee. Findings in this report update those from the October 2017 monitoring report and reflect the site visit team’s data collection, observations, and analysis of the State grantee’s compliance and performance under the CSP grant from the beginning of the current grant period to the time of the site visit. Source documentation is noted within each indicator table. Additional notable documents (i.e., those that are related to identified promising practices or implementation issues) are identified below in Appendix C.

A draft copy of the monitoring report is provided to the grantee for review, with a request for technical edits and corrections accompanied by supporting documentation. The grantee’s response is included as an appendix to this report and carefully considered before the monitoring report is

finalized. Hence, the final report will take into consideration the grantee's response as well as all of the other evidence gathered during the monitoring process.

The main purpose of the grantee review process is to make the report as accurate as possible to assist Department staff in monitoring activities. Grantee responses are used to clarify or correct details about policies, practices, or procedures occurring up to the time of the site visit and may result in revisions to observations and ratings, if justified. However, if the grantee submits evidence of new or changed policies, practices, or procedures that occurred after the site visit, that information will not be reflected in the report findings and will only be included in the appendix. This additional information would be beyond the scope of the site visit and would therefore not influence any observation or rating.

APPENDIX B
INDICATOR PERFORMANCE SUMMARY FROM OCTOBER 2017 MONITORING
REPORT (MARCH 2017 SITE VISIT)

The following table shows the rating and recommendations for each indicator on which the grantees were observed as a part of the March 2017 site visit. The table also provides details about specific issues that affected any rating, promising practices, or other noteworthy highlights. The table is color-coded to provide a quick overview of the grantee’s associated risk in meeting the CSP grant requirements. The color-coding key is below the table.

Indicator	Rating	Recommendation	Notes (implementation issues, promising practices, noteworthy highlights)
Indicator 1.1: SUBGRANT APPLICATION DESCRIPTIONS AND ASSURANCES.	Partially meets the indicator	Recommend Technical Assistance	Draft RFA does not include all required descriptions and assurances.
Indicator 1.2: ELIGIBLE APPLICANTS.	Fully meets the indicator	None	Requirement for sponsor approval goes beyond notification.
Indicator 1.3: DEFINITION OF CHARTER SCHOOL.	Does not meet the indicator	Requires Technical Assistance	Definition in draft RFA does not completely align with Federal definition (e.g., clauses on IDEA and elementary/secondary program missing).
Indicator 1.4: PEER REVIEW.	Does not meet the indicator	Requires Technical Assistance	Oversight of lotteries is indirect, through sponsor evaluations. Draft peer review documents are incomplete and inconsistent in desired qualifications for reviewers and methods for notifying, selecting, and training reviewers. Plans for using peer reviews to select subgrantees are undeveloped and do not take into account provisions in grant application (e.g., CEDO involvement, Recovery District Reserve).
Indicator 1.5: PROGRAM PERIODS.	Fully meets the indicator	None	State grant system only allows annual grant periods.
Indicator 2.1: QUALITY AUTHORIZING PRACTICES.	Partially meets the indicator	Recommend Technical Assistance	Robust authorizer (sponsor) evaluation framework is in place. However, high-stakes reviews may not take place at least once every five years for some community schools

Indicator	Rating	Recommendation	Notes (implementation issues, promising practices, noteworthy highlights)
			and technical assistance to authorizers may be limited.
Indicator 2.2: FLEXIBILITY AND AUTONOMY.	Does not meet the indicator	Recommend Technical Assistance	Flexibility and autonomy are outlined in existing state statute, however, there are potential implementation issues regarding conversion charter schools.
Indicator 2.3: SUBGRANTEE QUALITY.	Does not meet the indicator	Requires Technical Assistance	Subgrant application review materials are not fully developed. Draft documents provided are not internally consistent with subgrant application.
Indicator 2.4: PLAN TO SUPPORT EDUCATIONALLY DISADVANTAGED STUDENTS.	Does not meet the indicator	Requires Technical Assistance	There was not a specific plan for how the CSP grant would support student achievement for educationally disadvantaged students.
Indicator 2.5: SUBGRANTEE MONITORING.	Does not meet the indicator	Requires Technical Assistance	Existing state infrastructure for monitoring is systemic and will provide a valuable mechanism for CSP subgrantee monitoring. However, there has been no development of CSP specific monitoring content.
Indicator 2.6: DISSEMINATION OF INFORMATION AND BEST PRACTICES.	Fully meets the indicator	None	Plans for dissemination include conferences in November 2017 and Summer 2018. Will incorporate findings from authorizer evaluation for identification of best practices.
Indicator 2.7: ASSESSMENT OF PERFORMANCE MEASURE DATA.	Largely meets the indicator	Recommend Technical Assistance	Draft performance measures have not been fully approved yet. Some performance measures may be challenging to measure (e.g., 2.4, 3.4).
Indicator 3.1: STATE-LEVEL STRATEGY AND VISION.	Partially meets the indicator	Recommend Technical Assistance	Authorizer quality is a significant driver of the SEA's vision for growth and accountability. Recent staffing changes and turnover may inhibit immediate efforts to articulate vision and strategy.
Indicator 3.2: FEDERAL PROGRAMS AND FUNDING.	Largely meets the indicator	None	ODE has not yet developed a dissemination and engagement plan to guide communication with key stakeholders.
Indicator 3.3: ALLOCATION OF CSP FUNDS.	Fully meets the indicator	None	CFO is very cautious about overspending administrative funds. Grantee may want to consider utilizing

Indicator	Rating	Recommendation	Notes (implementation issues, promising practices, noteworthy highlights)
			admin funds to support current development activities.
Indicator 3.4: ADMINISTRATION OF CSP FUNDS.	Partially meets the indicator	Recommend Technical Assistance	Grants management division has strong fiscal systems in place; however, these systems are dependent on the program office effectively articulating allowable costs and ongoing collaboration between two divisions.
Indicator 3.5: USE OF GRANT FUNDS.	Fully meets the indicator	None	No subgrants have been awarded to date. RFA includes a basic list of allowable costs.
Indicator 3.6: LEA DEDUCTIONS.	Fully meets the indicator	None	Charter schools will receive subgrant funding directly from the SEA.
Indicator 3.7: TRANSFER OF STUDENT RECORDS.	Partially meets the indicator	Recommend Technical Assistance	SEA relies on authorizers to ensure that records are appropriately and effectively transferred. In the past, when issues have developed, the SEA has intervened when necessary.
Indicator 3.8: RECORDKEEPING.	Fully meets the indicator	None	Efforts to maintain and retain records is sufficient.
Indicator 3.9: COMPLIANCE WITH GRANT CONDITIONS.	Does not meet the indicator	Requires Technical Assistance	Sufficient progress has not been made on several high-risk conditions including High-Risk Specific Condition #5 which impacts the timeline for implementing the RFA.

Indicator Color Coding Key
Fully meets the indicator
Largely meets the indicator
Partially meets the indicator
Does not meet the indicator.

**APPENDIX C
LIST OF NOTABLE DOCUMENTS**

SECTION 1: SUBGRANT APPLICATION AND AWARD PROCESS

March 2017:

Draft Request for Applications

December 2017:

Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017)

Ohio CSP Grant Administration Comprehensive Plan

Ohio’s CSP Subgrant Review and Award Process

Grant Readers for Ohio's Charter School Program (CSP) Grant

CSP Grant Requirements Crosswalk

SECTION 2: CSP AND CHARTER SCHOOL QUALITY

March 2017:

Subgrantee Monitoring Protocol DRAFT

December 2017:

Request for Application-CSP

Sponsor Quality Practices Rubric

SECTION 3: ADMINISTRATIVE AND FISCAL RESPONSIBILITIES

March 2017:

Agreed-Upon Procedures

Request for Proposals (RFP) for Community School Program (CSP) Independent Monitor

Plan for the Ohio Grant Implementation Advisory Committee

Charter Schools Program Grant Fiscal Management Plan

ODE Monitoring Revisit 12/4-8

December 2017:

Ohio Request for Application, Subgrantee—Federal Charter School Program (CSP) Grant (April 2017)

Ohio CSP Grant Administration Comprehensive Plan

CSP Grant Requirements Crosswalk

Ohio High-Risk Condition Gantt Chart

ODE Corrective Action Plan

Kennedy Cottrell Richards engagement letter (May 31, 2017); Independent Accountant’s Report on Applying Agreed-Upon Procedures (August 14, 2017)

Governance Document for the Ohio CSP Grant Implementation Advisory Committee

Charter School Program Grant Monitoring Rubrics

Directory of Community Schools, Sponsors and Operators (webpage)

CSP Fiscal Management Plan

ODE CSP Grant (webpage)

SECTION 4: OVERSIGHT OF CHARTER SCHOOL AND MANAGEMENT ORGANIZATION RELATIONSHIPS

December 2017:

Charter Management Organization/Education Management Organization (CMO/EMO) Questionnaire