

Public Comment/Feedback on the Draft Documents for the 2026-2027 Sponsor Evaluation - Quality Practices

Sent by	Quality Section	Quality Practices Comments
<p align="center">Jason Kee, Assistant Legal Counsel, Charter School Specialists</p>	<p align="center">Instructions/Glossary of Definitions</p>	<p>Many documents are more than 25 pages. A memo adds additional time to the submission of documents. Highlighting a document with relevant information should be sufficient. Please further define "a formal statement of business goals". The business goals of all schools are to educate students according to the mission and vision of the school. Planning Stage should include the application period as many applicants begin planning even before they submit the application.</p>
	<p align="center">Section A: Commitment and Capacity</p>	<p>Comments A.01: 1) Define sponsoring practices. Different reviewers may define it inconsistently. Or use sponsoring priorities or sponsoring responsibilities that are already defined in the glossary of definitions. 2) The word clear is used in the key indicators but not in the point boxes. Wording in the key indicators and point boxes should remain consistent to provide clarity for sponsors and reviewers.; Comments A.02: 1) The use of the word strategic is problematic and increases the subjectivity of the evaluation. If the reviewer does not believe the self-evaluation process is "strategic", then it could be discounted. Strategic should be removed as each sponsor should be permitted to implement actions independently and autonomously. 2) Sponsoring obligations should be defined. Different reviewers may define it inconsistently. In the alternative use sponsoring priorities or sponsoring responsibilities that are already defined in the glossary of definitions. 3) Provide examples of what evidence would be needed to show development and implementation of action steps; Comments A.03: 1) This should not be an additional requirement as the contract and statutes adequately define the roles and responsibilities of the sponsor and the school. 2) This indicator adds a new compliance requirement not evidenced in OAC or ORC. The Department should not be permitted to add new sponsor compliance requirements outside of what is already included in rule and law; Comment A.04: Is the addition of "each of its sponsoring responsibilities" necessary? How will the timeline of "each of its sponsoring responsibilities" be measured? Why not just use a deadline of September 30th?; Comment A.05: 1) Under 2 points - why must the sponsoring responsibilities be designated to specific staff or contractors? It should be sufficient to delegate to specific departments within the organization. 2) Can expertise be more closely defined? Comment A.06: How should sponsors show evidence of alignment of professional development to sponsoring responsibilities? Is this something reviewers are specifically trained to look for and will they be reviewing the subject matter of all professional development?;</p>

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<p align="center">Jason Kee, Assistant Legal Counsel, Charter School Specialists</p>	<p align="center">Section A: Commitment and Capacity</p>	<p>Comment A.07: 1) Each sponsor submits a yearly sponsor expenditure report to the Department in August. This requirement is covered by submission of that yearly sponsor expenditure report. Any additional requirements: i.e. budget narrative, are outside the scope of the law and should not have to be provided.</p> <p>2) The answer to the appropriate allocation of funds should be based on performance. In other words, outputs should be used to determine if input (funds) are achieving the desired results. It will be clear through an assessment of the professional development, technical assistance, interventions and attendance at board meetings exactly how the sponsor is allocating resources.</p> <p>3) Providing a sponsor budget with detailed line items indicating revenues and expenditures could involve a sponsor releasing proprietary information. This should not be required.</p> <p>4) What evidence should be provided that sponsor's fees do not create potential conflict of interest. It is difficult to prove a negative.</p> <p>5) What evidence should be provided to show "data-driven decisions" from the needs assessment.</p>
	<p align="center">Section B: Application Process and Decision-Making</p>	<p>Comment B.01: 1) The planning stage for the school should not be included as a requirement and is not relevant to the application process. Many schools applying for sponsorship have spent time planning prior to completing the application.</p> <p>2) It should be clarified if the planning stage begins: a) when the application period opens, b) when the application is submitted, or c) when the application is approved.;</p> <p>Comment B.02: 1) Capacity to execute the plan is evidenced throughout the entire application. This is something determined by the sponsor as part of the application review and should not be a required separate section of the application.;</p> <p>Comment B.03: 1) This section should provide for a points deduction for sponsors who accept schools after the statutory December 31 deadline if the school did not provide proper notification to its current sponsor.</p> <p>2) This section should deduct points for sponsors accepting schools that are changing to avoid intervention or corrective action (See Standard E.02). 3) The requirement to interview the current sponsor of the applicant should only apply if the existing/transfer school is operated by a management company with no prior relationship (i.e. sponsorship of schools) with the new sponsor.;</p> <p>Comment B.04: "Expertise in the areas of" and "area of specialization" should be more clearly defined.</p>

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<p align="center">Jason Kee, Assistant Legal Counsel, Charter School Specialists</p>	<p align="center">Section B: Application Process and Decision-Making</p>	<p>Comment B.05: 1) The rubric requires "each reviewer to individually score and document the rating for each selection criteria" - this should be changed to allow for individual reviewers to document the rating for each selection criteria to which they are assigned. Individuals who review the educational plans, mission, vision and staffing plans are not always the same reviewers that review facilities, budget and governance.</p> <p>2) Sponsors should not be required to provide a "cut score". Sponsors should have the autonomy to evaluate the applications and score the applications without having to set a minimum score.</p> <p>3) Preliminary agreements are no longer required for exemplary sponsors.;</p>
	<p align="center">Section B: Application Process and Decision-Making</p>	<p>Comment B.06: 1) This standard for one point requires that the sponsor show evidence that either reviewers do not cite evidence or at least one school with less than 50 percent of possible points received a preliminary agreement. However, to meet 2, 3, or 4 points, the sponsor must submit evidence that reviewers "do" cite evidence and that there is no school with less than 50 percent of points. So it is impossible for a sponsor to meet 1 point, and then to also meet either 2, 3 or 4 points in the rubric.</p> <p>2) This criteria requires each completed application, scoring documents, and completed rubrics for all applications. We accept between 8 - 12 applications per year which makes submission of these documents cumbersome and thousands of pages. The standard should be revised to allow for the uploading of a sample of applications or at least downsized to only include the scoring documents.</p> <p>3) 75% is not an adequate measure as all sponsors have different applications. The 75% requirement is completely arbitrary and does not allow sponsor autonomy in applications and scoring processes.</p> <p>4) Exemplary sponsors are no longer required to provide preliminary agreements. This requirement should be removed</p>

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<p align="center">Jason Kee, Assistant Legal Counsel, Charter School Specialists</p>	<p align="center">Section C: Performance Contracting</p>	<p>Comment C.01: 1) This section clearly violates the autonomy of sponsors by requiring all sponsor contracts to mirror each other. Sponsors will not be permitted to draft their own student performance measures, rather they will be forced to use the criteria approved by the Department.</p> <p>2) This criteria requires annual metrics and targets - this needs clarified. Does this mean the performance framework has to be evaluated each year or that it should include 1 year metrics and targets for the length of the contract?</p> <p>3) "Schools serving a specific subgroup of students" should be more clearly defined. Does this mean that the entire school only serves a subgroup of students, or does this mean the subgroups of students within a school's student population?;</p> <p>Comment C.02: 1) The requirement of a high stakes review every five years is unnecessary. One high stakes review at the time of renewal is sufficient, especially taking into account the annual reports that are done each year under D.07. Under D.07, the school is notified annually of its progress toward meeting the high stakes review goals upon renewal.</p> <p>2) This criteria should not include anything beyond what is required in rule and law regarding renewal. The sponsor evaluation is an evaluation of the sponsor's adherence to rule and law and should not subject sponsors to additional requirements.;</p>

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<p align="center">Jason Kee, Assistant Legal Counsel, Charter School Specialists</p>	<p align="center">Section D: Oversight and Evaluation</p>	<p>Comment D.02: 1) Financial reviews include budget ledgers and transactional detail reports - in consultation with a community school treasurer who provides services to over 30 community schools, he stated "I could understand the request a little more if the school was having financial difficulties, not paying vendors on time, having material weaknesses/findings in audits, etc, but aside from those types of circumstances, I'm not sure what could be gleaned from reviewing transactional detail on a monthly basis that you can't get from the current financial package. To provide this would result in us having to submit over 400 additional reports annually."</p> <p>2) The five-year forecast should be changed to either financial forecast or three-year forecast; Comment D.03: 1) It is unnecessary and outside of statutory confines to require visits to be in the first half and second half of the year. This is sometimes difficult as the "first half" of the year is typically slightly shorter in number of days and some visits may need to be re-scheduled because of weather/calamity days. Additionally, visits done in the "second half" of the year must be completed and documentation done no later than May 15th for the upload.</p> <p>2) The requirement to connect with stakeholders should be reduced to 2 stakeholders. Some schools have students that are too young to contact - i.e. smaller K-1 or K-2 schools. Also, it is disruptive to a child's school day to be interviewed by an outsider to the school. Additionally, parents are often not present during school visits or may not be interested in spending time being interviewed by the sponsor. Site visits should not be disruptive to a school day - but used to passively observe the school in action and evaluate how the school is operating.; Comment D.04: 1) It is unnecessary and outside of statutory confines to require visits to be in the first half and second half of the year. This is sometimes difficult as the "first half" of the year is typically slightly shorter in number of days and some visits may need to be re-scheduled because of weather/calamity days. Additionally, visits done in the "second half" of the year must be completed and documentation done no later than May 15th for the upload.</p> <p>2) The first half/second half requirement should only be assessed under one criteria - either D.03 or D.04. It is unfair to penalize sponsors under both criteria for the same metric.</p>

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<p align="center">Jason Kee, Assistant Legal Counsel, Charter School Specialists</p>	<p align="center">Section D: Oversight and Evaluation</p>	<p>3) The sponsor should not be required to provide specific steps or timeframes for the school's areas of improvement. To allow for adequate autonomy in the schools, the school should be allowed to provide these specifics to the sponsor.; Comment D.05: 1) This criteria is redundant and is covered in sections C.01, D.01, D.02, D.03, D.04, D.06, D.07 (to name a few). The way the standard is worded, the sponsor should provide all documentation from D.06 (interventions), D.01 (compliance measures and organizational monitoring), and D.02 (financial reviews).</p> <p>2) The guidance document states the sponsor's performance framework would not be applicable to this section. However, the performance framework is very relative to how and what data is collected on a yearly and multi-year basis. In fact, the key indicators mention using the performance framework.; Comment D.06:</p> <p>1) Sponsors should not be required to upload contracts for schools. These contracts are provided to the Department and accessible on the Department's website.</p> <p>2) Not every situation will have steps and timeframes for resolving the deficiency and not all deficiencies will need to have status updates requested and reviewed. Sponsors should have autonomy to handle interventions as necessary without being dictated what must be provided and collected.; Comment D.07: 1) These reports should not be required to state a school's prospects for renewal. A school may be in its first year or operation and renewal is several years away. At that point, there is no way to tell if the school....</p>

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<p align="center">Jason Kee, Assistant Legal Counsel, Charter School Specialists</p>	<p align="center">Section E: Termination and Renewal Decision-Making</p>	<p>Comment E.01: A written application should not be required of renewal schools. Sponsors should base renewals on the school's performance which is assessed annually and over multiple years. Based on the criteria in D.07 - schools already know their performance.; Comment E.02: 1) Same comment as E.01 - a written application should not be required. Additionally by assessing the written application in both sections E.01 and E.02 - the sponsor loses points in both sections which is unfair. 2) If a sponsor chooses to renew a school, it should not have to align this decision with national practices. Each state is different in how it assesses performance of schools and of how charter schools are operated. 3) The school should not have to score a certain percentage. Sponsors should have autonomy to score schools and establish renewal criteria. This percentage has no basis in rule, law or national best practice.; Comment E.03: Sponsors should not be required to provide an explanation "beyond statutory language". The sponsor evaluation was developed to ensure sponsors are complying with rule and law, not add additional obligations beyond that.; Comment E.04: 1) Sponsors should not be required to provide a written policy that goes beyond the statutory language for closing (See Comment E.03) 2) The guidance document states the contract is not acceptable as an upload, however to receive 1 point in the section the sponsor must show statutory language in the contract for termination.; Comment E.05: 1) Sponsors should not be required to provide closure guidance beyond the Department's guidance. If the sponsor is following the guidance of the Department - this should be acceptable. 2) This standard requests information on schools closed before the review year. The reviewers should be provided this information by the Department and not require submission by the sponsor. 3) "Plan of action" should be defined.; Comment E.06: 1) This standard requires each reviewer to individually score and document the rating for each renewal criteria. However part of the renewal criteria that is required is the high stakes review. Reviewers should not be required to score the high stakes review as the scoring is not discretionary and is built in to the performance framework. 2) The high stakes review should not be required to be 67% of the contract renewal scoring. This is an arbitrary number with no basis in rule, law or national best practice.</p>
	<p align="center">Section F: Technical Assistance</p>	<p>Comment F.01: Three instances of technical assistance should not be required. Often, schools are performing well and are not in need of three instances of technical assistance. Also schools may want to reach out to their own legal counsel for technical assistance. Sponsors should have the autonomy to provide technical assistance as needed instead of providing a mandated amount.;</p>

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<p align="center">Jason Kee, Assistant Legal Counsel, Charter School Specialists</p>	<p align="center">Other Comments</p>	<p>Comment D.07 (cut off): 1) These reports should not be required to state a school's prospects for renewal. A school may be in its first year or operation and renewal is several years away. At that point, there is no way to tell if the school is on track for renewal. Many things may change at the school over the course of the term of its contract that affect renewal. Opining on the renewal may open sponsors to liability.</p> <p>2) The report should not require areas for improvement. Some schools are performing well and do not need to be provided areas for improvement.; Comment F.02: Sponsors should not be required to provide an annual training to assist schools in understanding changes in rule, law and policy that impact community school operations. Board members and school personnel are already required to attend annual open meetings and public records training. Requiring an additional training is cumbersome and burdensome to people who are already volunteering their time. Additionally, there is no guarantee anyone will attend the training.</p>
	<p>What other suggestions do you have to improve the sponsor evaluation process?</p>	<p>Charter School Specialists has proposed an alternative model - the Portfolio Model. There have also been suggestions of a model redesign from OACSA.</p>
<p align="center">No Name, Position, or Organization Provided</p>	<p>Instructions/Glossary of Definitions</p>	<p>No comment provided</p>
	<p>Section A: Commitment and Capacity</p>	<p>No comment provided</p>
	<p>Section B: Application Process and Decision-Making</p>	<p>No comment provided</p>
	<p>Section C: Performance Contracting</p>	<p>No comment provided</p>
	<p>Section D: Oversight and Evaluation</p>	<p>D.02- refers to a 5 year forecast. The law changed in 2025 and eliminated the 5-year forecast for a fiscal forecast that looks at the current year and the next 3 years.</p>

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No Name, Position, or Organization Provided	Section E: Termination and Renewal Decision-Making	No comment provided
	Section F: Technical Assistance	No comment provided
	Other Comments	No comment provided
	What other suggestions do you have to improve the sponsor evaluation process?	No comment provided

Public Comment/Feedback on the Draft Documents for the 2026-2027 Sponsor Evaluation - Compliance

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<p align="center">Brian Dunbar, Chief Compliance Officer, Charter School Specialists</p>	<p align="center">Sponsor Worksheet</p>	<p>S-602 and 603- "The sponsor obtains a recommendation from the Transformation Alliance before opening a new school within Cleveland Municipal School District." As I understand it, the Transformation Alliance (in Cleveland) has been dissolved, if so, getting a recommendation from them would be near impossible. "If yes, did you comply with ORC 3311.86(E) and receive authorization to sponsor new community schools in the Cleveland Municipal School District OR are you exempt under ORC 3314.021 or 3311.027?" This ORC does not explicitly or solely reference Cleveland Municipal. Should this question not specifically refer to Cleveland Municipal, as it could be theoretically applicable to a different district that met the criteria to develop an "Alliance"?</p>
	<p align="center">Oversight of Schools Worksheet</p>	<p>119 Conditionally applicable, remove from efficiency question. 121 Should this specify in document submission "for current school year" 123 Conditionally applicable, remove from efficiency question. Not all schools that serve grades 9-12 have a foreign language requirement. 156 This is still unclear. Should this include a resolution, minutes, or both? Wouldn't a resolution alone be evidence of board adoption and vice versa. "Copy of the board-approved resolution OR meeting minutes reflecting adoption by resolution." 163 Should this be an efficiency question? Not all high schools have a LEAP program. 197 Should there be a "N/A" option, if the school does not offer advanced standing programs? 226 Since the coach trainings are a requirement for renewing pupil activity permit, would collecting the pupil activity permits suffice? 230 Hasn't this been expanded beyond just teachers and administrators? ie. intervention specialists, reading specialists, SLP's, school psychologists 320 What evidence can be provided that this has been made "available to students upon request." If it is posted in a central location, wouldn't that be "available" to students or is this two separate requirements? 411 This has been "un-greyed" for 26-27, but the validation documentation is not greyed out. Is anything required for validation? 436 Should be able to answer N/A for new schools, consider changing first question</p>

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<p align="center">Brian Dunbar, Chief Compliance Officer, Charter School Specialists</p>	<p align="center">Oversight of Schools Worksheet</p>	<p>523 The instruction to select “N/A” is unnecessary and confusing, as the efficiency question already captures whether the school holds a credit card account. If the school does not hold a credit card account, the statutory requirement under ORC 3314.52(D) is not triggered, and the item would not apply without the need for a separate N/A selection.</p> <p>524 The instruction to select “N/A” is unnecessary and confusing, as the efficiency question already captures whether the school holds a credit card account. If the school does not hold a credit card account, the statutory requirement under ORC 3314.52(D) is not triggered, and the item would not apply without the need for a separate N/A selection.</p> <p>525 The instruction to select “N/A” is unnecessary and confusing, as the efficiency question already captures whether the school holds a credit card account. If the school does not hold a credit card account, the statutory requirement under ORC 3314.52(D) is not triggered, and the item would not apply without the need for a separate N/A selection.</p> <p>527 "The placement of “OR” could be misleading, as it may suggest that the bond may be submitted in place of evidence of board approval while still requiring the policy. To clarify that these are two distinct compliance options, consider revising document submission to reflect: -Copy of the fiscal officer’s bond that meets the requirements of ORC 3314.011(B); OR -If no bond was executed, a copy of the board-approved policy adopted pursuant to ORC 3.061, along with evidence of governing authority approval."</p> <p>604 "Does the required AOS Fraud Reporting and Training video meet the requirements for this item? https://ohioauditor.gov/trainings/fraud.html "</p> <p>654 Isn't a board approved resolution "evidence" of board approval? Can board minutes that use the language "resolve" count as a resolution?</p> <p>718 Is the intent to require policy + minutes + purchase approval? If so, "Copy of board-approved policy, meeting minutes reflecting board approval, and evidence of board approval of the purchase."</p> <p>787 Clarification regarding acceptable validation documentation for board "provided" training (e.g., training certificate, agenda, vendor documentation, board acknowledgment, etc.)</p>

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<p align="center">Brian Dunbar, Chief Compliance Officer, Charter School Specialists</p>	<p align="center">Oversight of Schools Worksheet</p>	<p>788 "Consider rephrasing: Does the school nurse or school administrator (if the school does not have a nurse): -Identify each individual who has received training in the administration of drugs prescribed for seizure disorders; -Ensure that all eligible staff are trained in the care of students with seizure disorders; and -If a student is permitted to possess seizure medication, require written approval from the student's parent/guardian and licensed health care provider?</p> <p>Clarify which training platforms meet this requirement. Not all seizure training platforms include medication administration. *change from ""allow"" to ""permit."" Allow implies that the school has discretion, ""permit"" is the language in the statute."</p> <p>789 How are we documenting that the required training counted as "Professional Development?" Is the completion certificate sufficient or do we need affirmation in writing?</p> <p>791 "The question states "or," which reflects that schools are not required to provide all three items. However, the Document Submission section uses "and," which implies that student IDs, planner pages, and portal screenshots must all be submitted. The Document Submission language should be revised to reflect "and/or, as applicable," so that schools only submit documentation for the mediums they actually use. Is ORC referenced here correct? Suicide prevention hotline information does not appear in the Parental Involvement Policies (3313.473). This should reference 3313.474</p>

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<p align="center">Brian Dunbar, Chief Compliance Officer, Charter School Specialists</p>	<p align="center">Oversight of Schools Worksheet</p>	<p>Additionally, clarification is needed regarding “electronic portals.” Does this include a school’s public website? If not, consider revising to “electronic portals (e.g., student learning management systems or login-based student dashboards)” to provide clearer guidance.</p> <p>793 "The current question phrasing suggests that adoption of the policy is optional (“Did the school adopt a policy...”), whereas ORC 3313.8110 establishes a mandatory requirement. The wording should clearly reflect that this is not discretionary. Consider revising the question to read:</p> <p>“Has the school adopted a board-approved policy, as required by ORC 3313.8110, to prevent the purchase of cultivated-protein food products or food misbranded as a meat or egg product?”</p> <p>This revision more accurately conveys that the policy is required rather than optional."</p> <p>803 This only applies to schools who are or will be transporting all students from one or more districts and are eligible for funding - you do not need an agreement with ODEW or the districts if you only transport a portion of students from a district because the school is not eligible for funding unless it is all students from at least one district.</p> <p>809 This only applies to schools who are transporting all students from one or more districts and who have an agreement with the district(s) and ODEW and are eligible for funding.</p> <p>811 This should apply to all brick and mortar schools - not just schools providing transportation since any school can contract services for field trips etc.</p> <p>815 This should apply to all brick and mortar schools - not just schools providing transportation because schools who rely on district transportation may contract with a vendor to transport IEP students</p> <p>820 This only applies to schools who are transporting all students from one or more districts and who have an agreement with the district(s) and ODEW and receive funding - schools who only transport a portion of students from a district are not eligible for funding and not subject to this statute.</p> <p>822 If the answer is Yes, then it should not just be marked as sponsor certified compliant - there needs to be an action. Any school transporting students to and from school via a multi-function activity bus is doing so illegally and needs a corrective action plan</p> <p>956 Remove from efficiency questions, only conditionally applicable.</p>

Public Comment/Feedback on the Draft Documents for the 2026-2027 Sponsor Evaluation - Technical Document

Sent by	Technical Document Section	Technical Document Comments
No comments/feedback provided for any sections of the technical document		