

Technical Documentation for the 2020-2021 Community School Sponsor Evaluation

Overview

The Ohio Department of Education developed an evaluation system (per Ohio Revised Code 3314.016) that rates any entity that sponsors a community school based upon three components: Academic Performance, Adherence to Quality Practices and Compliance with All Applicable Laws and Rules. Each component is equally weighted. This document details the business rules for the 2020-2021 sponsor evaluation.

The categories for overall ratings are "Exemplary," "Effective," "Ineffective" or "Poor." The Department gives separate ratings for each evaluation system component. Those components are Academic Performance, Compliance with All Applicable Laws and Rules and Quality Practices.

Determination of Relationship Between Community School and Sponsor

For purposes of the 2020-2021 sponsor evaluations, the Department identifies schools associated with each sponsor as of July 1, 2020, and as of July 1, 2021. Identifying these relationships at two points in time allows the Department to address year-to-year sponsor portfolio changes for the Academic Performance component (as described in more detail in Section 4 below).

Data Collection and Report Distribution

The Academic Performance component is based on Ohio School Report Card measures. Report card measures are based on data reported to the Department by districts and schools through the Education Management Information System (EMIS).

The Department leveraged its existing contract with the National Charter Institute to collect sponsor certification and documentation for the Compliance with All Applicable Laws and Rules component and the Quality Practices component through Epicenter, a data collection system that is provided at no cost to sponsors.

Frequency of the Sponsor Evaluation

The sponsor evaluation takes place on an annual basis. However, with recent statutory updates to ORC 3314.016(B)(7)(b), community school sponsors that have received Effective or Exemplary ratings for the three most recent consecutive review cycles in which they participated and received ratings will not be evaluated again until the third evaluation cycle. If sponsors receive an Ineffective rating, sponsors will return to the annual evaluation cycle until they earn three consecutive Effective or Exemplary ratings.

Although these sponsors will not have to participate in the sponsor evaluation process during the years they are exempt, they must maintain documentation required by law for audit purposes and to fulfill their legal responsibilities for their sponsored schools.

Academic Performance Component

The evaluation framework, recommended by an independent panel and adopted by the Department, states the Academic Performance component must align to the Ohio School Report Cards.

The Academic Performance component score is based upon all applicable report card measures prescribed for the state report cards under ORC 3302.03 (for community schools operating as traditional school districts) or ORC 3314.017 (for schools operating dropout prevention and recovery programs) and is weighted by the number of students enrolled in each school in the sponsor's portfolio.

The Academic Performance component score also will account for year-to-year changes in the overall sponsor portfolio, as described in more detail below.

Statutory Exclusions

In accordance with ORC 3314.016(B)(2), the Academic Performance component score does not include community schools that have been in operation for not more than two full school years or community schools described in ORC 3314.35(A)(4)(b) (“any community school in which a majority of the enrolled students are children with disabilities receiving special education and related services in accordance with ORC Chapter 3323”). While the schools described in ORC 3314.35(A)(4)(b) are not included in the sponsor evaluation, the academic performance of these schools is reported. For these schools, a separate file will be provided that links to the individual school’s report card.

Evaluating Overall Academic Performance for Individual K-12 Schools

The Academic Performance component scores are calculated using the following rules.

The Academic Performance calculation is based on the graded measures, component grades and overall grades published on the Ohio School Report Cards.

The report card component grades technical documentation can be found at:

<http://education.ohio.gov/getattachment/Topics/Data/Report-Card-Resources/Sections/Report-Card-Components/Component-Grades-Technical-Documentation.pdf.aspx>.

1. Calculating Total Weighted Points

For each school, the applicable report card component grades will be assigned a numerical value (rounded to the thousandths) based on business rules outlined in the component grades technical documentation. In calculating the total Academic Performance component score for each school, individual component points will be weighted based on the weights described in Ohio Administrative Code 3301-28-10. Per ORC 3302.03(C)(3) and OAC 3301-28-10, each school's report card will include an overall grade, which will be used for the sponsor evaluation.

Additional information on the assignment of overall grades can be found in the technical document located here:

<http://education.ohio.gov/getattachment/Topics/Data/Report-Card-Resources/Sections/Report-Card-Components/Overall-Grade-Technical-Documentation.pdf.aspx?lang=en-US>

2. Translating to the Common Scale

The Total Weighted Points will be converted to a 0 to 4 scale (this scale is the equivalent of the A-F report card grade, which was published for each school starting in 2017-2018), as provided in the following table:

Overall Academic Performance Score		
Total Weighted Points	Report Card Grade	Report Card Grade Equivalent
4.125-5.000	A	4
3.125-4.124	B	3
2.125-3.124	C	2
1.125-2.124	D	1
0-1.124	F	0

Each dropout prevention and recovery school receives an overall school rating of either Does Not Meet Standards, Meets Standards or Exceeds Standards. The overall school rating of each dropout prevention and recovery school will be converted to a 0 to 4 scale, as shown below:

Overall Academic Performance Rating for Dropout Prevention and Recovery School	
Overall School Rating	Points
Exceeds Standards	4
Meets Standards	2
Does Not Meet Standards	0

The common scale will be as follows:

Overall Grade for Traditional Community Schools	Dropout Prevention and Recovery Report Card Rating	Points
A	Exceeds Standards	4
B		3
C	Meets Standards	2
D		1
F	Does Not Meet Standards	0

3. Structure of Sponsor Evaluation for Academic Component

The Independent Panel addressed the methodology for weighting:

The original statutory language references the academic performance of students and House Bill 2 then added additional language regarding this component being derived from the report cards.

- *A hybrid approach will be utilized to aggregate report card data for the schools in the portfolio. Individual school-level report card data is translated to the common scale for each school in the portfolio and then weighted by the total percentage of the average daily membership of the entire statewide portfolio.*

Section 11 of House Bill 216 provided additional requirements on how to calculate the average daily membership (ADM) of a sponsor's portfolio for the 2017-2018 and 2018-2019 sponsor evaluations. The provision required the agency to exclude displaced enrollees from the ADM that is used to determine the weighted points for each school in the portfolio. The provision defined "displaced enrollees" as students who, for any time during the 2017-2018 school year, were enrolled in an internet- or computer-based community school that prior to the end of that school year had its operations suspended by the school's sponsor and, at any time during the 2017-2018 school year, the student enrolled in a different community school or a school operated by a school district board of education. The exclusion of these students covered the 2017-2018 and 2018-2019 evaluations only. For 2019-2020 and beyond, all enrolled students will be included when calculating each school's ADM.

The following is an example of how the Academic Performance component will be calculated based on a sponsor with two community schools that receive traditional report cards and one school that receives a dropout prevention and recovery report card:

School	Overall Academic Performance	Points	ADM	Weight	Weighted Points
Community School #1	4	4	250	$X(250/1000)$	1.000
Community School #2	1	1	500	$X(500/1000)$	0.500
Dropout Prevention and Recovery School # 3	Meets	2	250	$X(250/1000)$	0.500
Total Weighted Points					2

The ADM for each school is rounded to the nearest whole number, while each school's weight in the sponsor's portfolio is rounded to the nearest thousandth. Weighted points for each school are rounded to the nearest thousandth and then summed and rounded to the nearest whole number to get a sponsor's total weighted points.

4. Changes in Portfolio

ORC 3314.016(B)(1)(a) specifies that "the academic performance component also shall include year-to-year changes in the overall sponsor portfolio."

Such changes are factored into the Academic Performance component by creating a weighted score for the sponsor's portfolio of schools sponsored at any time during the 2020-2021 school year, as well as a weighted score for the sponsor's portfolio that reflects actions by the sponsor to remove schools from its portfolio prior to July 1, 2021. The calculation for both portfolios is based on schools' 2021 report card results. The two weighted scores will be averaged and rounded to the nearest tenth for a final Total Weighted Points.

The following is an example of averaging the portfolios. If the sponsor had a portfolio of three schools for the 2020-2021 school year, the calculation for this portfolio would be as follows:

School	Overall Academic Performance	Points	ADM	Weight	Weighted Points
Community School #1	4	4	250	$X(250/1000)$	1.000
Community School #2	1	1	500	$X(500/1000)$	0.500
Dropout Prevention and Recovery School # 3	Meets	2	250	$X(250/1000)$	0.500
Total Weighted Points					2

If, as of July 1, 2021, the sponsor no longer sponsors School #2, the calculation for the new portfolio would be as follows:

School	Overall Academic Performance	Points	ADM	Weight	Weighted Points
Community School #1	4	4	250	X(250/500)	2.000
Dropout Prevention and Recovery School # 3	Meets	2	250	X(250/500)	1.000
Total Weighted Points					3

The results of the two portfolios are then averaged, resulting in a score of $(2 + 3)/2 = 2.5$.

5. Scale for Academic Performance Component

Once each school’s performance is weighted by its ADM, the weighted points are summed and relevant changes in the portfolio are addressed, the weighted points are converted to Academic Performance points using standard rounding rules to create the following scale:

Weighted Points	Grade (or Equivalent)	Points Earned for Academic Performance Component
3.5 – 4	A	4
2.5 – 3.49	B	3
1.5 – 2.49	C	2
.5 – 1.49	D	1
0 – .49	F	0

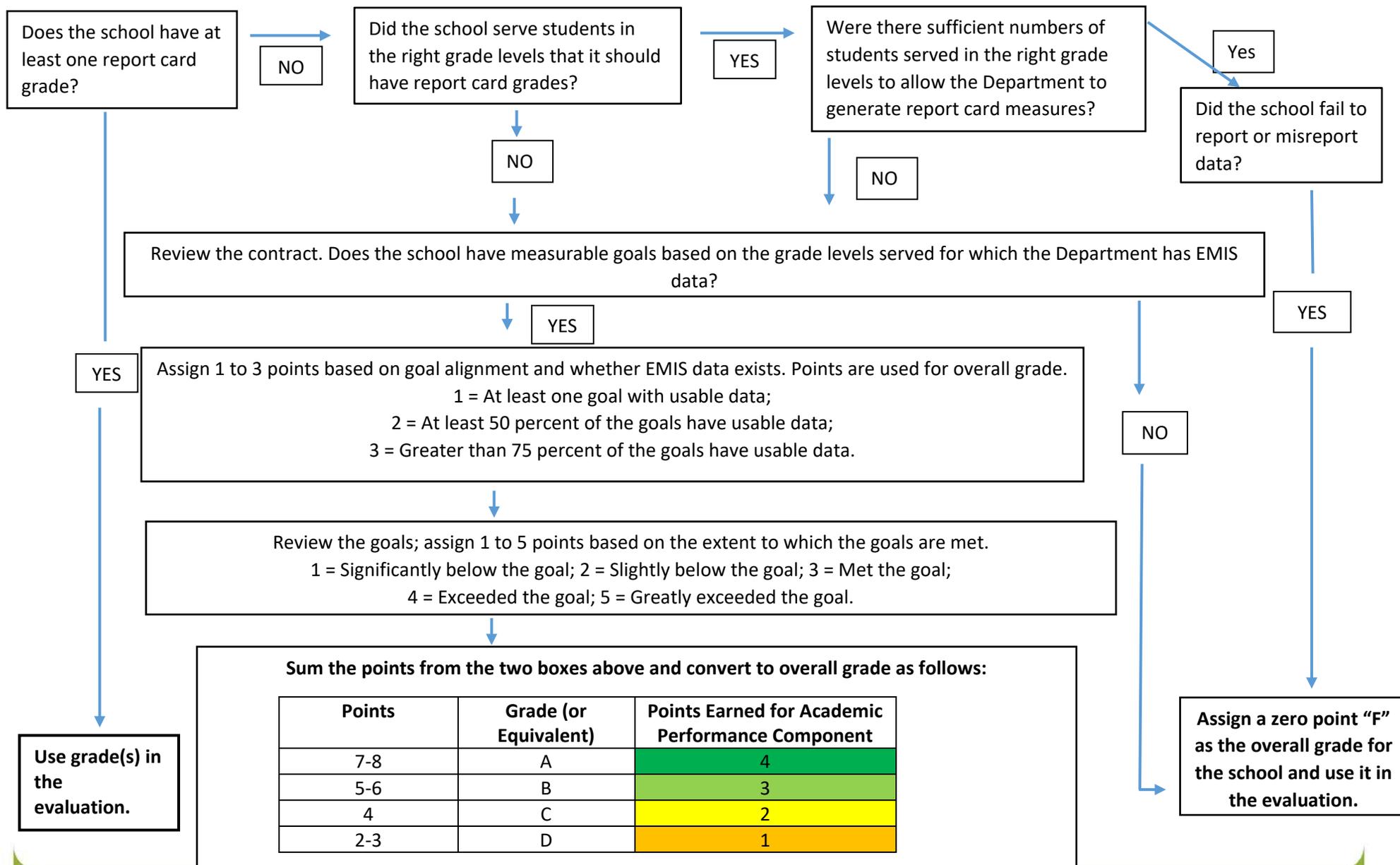
6. Evaluating Schools That Do Not Receive Report Cards

Some schools are not expected to receive any graded report card measures because they do not serve enough students in the relevant grades to generate measures. When no graded performance measures are applicable, HB 2 requires the Department to use measures specified in the contract between the sponsor and the community school. For those schools, the contracts between the schools and sponsors will be reviewed by the Department’s Office of Accountability, with assistance from the Office of Community Schools and Office of Legal Counsel.

The evaluation of schools without graded measures will be conducted using the process outlined in the flowchart below that identifies the objectives set forth in each related contract and the school’s performance on those objectives.

In cases where the school served a sufficient number of students in the grade levels required to take state tests but the school failed to report required EMIS data to the Department, a zero (“F”) will be assigned to the school’s overall rating.

Sponsor Evaluation Flowchart



Review the contract. Does the school have measurable goals based on the grade levels served for which the Department has EMIS data?

Assign 1 to 3 points based on goal alignment and whether EMIS data exists. Points are used for overall grade.
 1 = At least one goal with usable data;
 2 = At least 50 percent of the goals have usable data;
 3 = Greater than 75 percent of the goals have usable data.

Review the goals; assign 1 to 5 points based on the extent to which the goals are met.
 1 = Significantly below the goal; 2 = Slightly below the goal; 3 = Met the goal;
 4 = Exceeded the goal; 5 = Greatly exceeded the goal.

Sum the points from the two boxes above and convert to overall grade as follows:

Points	Grade (or Equivalent)	Points Earned for Academic Performance Component
7-8	A	4
5-6	B	3
4	C	2
2-3	D	1

Use grade(s) in the evaluation.

Assign a zero point "F" as the overall grade for the school and use it in the evaluation.

Compliance with Laws and Rules Component

For the 2020-2021 Compliance with All Applicable Laws and Rules calculation, the current OAC 3301-102-08 is applied and aligns with the requirements outlined in HB 2. Since statute requires this component to include compliance with ALL applicable laws and administrative rules, sponsors will be evaluated for compliance with all applicable laws and rules, including their obligation to monitor their schools' compliance with all laws and rules.

The Department compiled lists of all rules and laws that apply to community schools and/or their respective sponsors and posted them for public comment on Jan. 31, 2020. The posted lists identified all changes made from the lists used for the 2019-2020 evaluation. The Department requested comments no later than March 3, 2020. The finalized lists include items for both sponsor-level and school-level certification. The Department reviews the lists on an annual basis and publishes them on or before July 15.

The sponsor's score for this component is determined by equally weighting all sponsor-level items except Item S-615, which specifically addresses a sponsor's oversight of its schools' compliance. For Item S-615, the sponsor may receive between 0 and 4 points, depending on its percentage of substantiated items. This item incorporates the school-level compliance items for all sponsored schools to demonstrate sponsor oversight of schools. To assess this item (the sponsor's compliance with its oversight responsibilities), the vendor reviews sponsor certification responses for all schools in the sponsor's portfolio and any additional documentation gathered during the validation process.

The Department engages a third-party vendor to perform the compliance reviews and provides it with applicable view-only access to Epicenter.

The items being reviewed for this component are based on actions taken and documents submitted during the review period (July 1, 2020, through June 30, 2021), except for the expenditure report, which is due no later than Aug. 15, 2021.

FAILURE TO SUBMIT THE SPONSOR OVERSIGHT COMPLIANCE WORKSHEET FOR ALL SPONSORED SCHOOLS MAY RESULT IN THE DEPARTMENT ACTING PURSUANT TO ORC 3314.015 AND OAC 3301-102-07.

Sponsor Submission: Each sponsor will be required to identify its compliance status for each item on the list for its organization and each school in its portfolio utilizing a series of certification worksheets that must be uploaded to Epicenter by the sponsor in the provided format. One worksheet is designated for compliance items related to the sponsor. Another worksheet is designated for items related to the sponsor's oversight of its schools' compliance and must be submitted for each school in its sponsoring portfolio.

In the worksheets, the sponsor responds to a series of Yes/No questions that result in the sponsor's certification of compliance: compliant, not compliant or not applicable. The sponsor is instructed to indicate if the school was placed on a corrective action plan for any school item that is determined to be not compliant.

In addition to the completed certification worksheets, the sponsor is required to upload a signed certification form. The sponsor is required to submit supporting documentation for items selected during the validation process. The sponsor can reuse any documentation from a previous submission if it still is applicable to this item.

For any school item with a determination of "not compliant" for which the sponsor indicated the school was placed on a corrective action plan, the sponsor is instructed to upload the corrective action plan under a separate submission type for all corrective action plans at the time it submits the completed worksheets.

IF A SPONSOR FAILS TO UPLOAD THE SIGNED CERTIFICATION BY THE DEADLINE ESTABLISHED BY THE DEPARTMENT, THE DEPARTMENT WILL RELY SOLELY UPON THE INFORMATION THAT HAS BEEN SUBMITTED BY THE DEADLINE.

Review and Validation Process: Ohio Administrative Code Section 3301-102-08 requires validation of a sponsor's certifications. To validate the certifications for the selected compliance items, the vendor uses information provided by the Department, documentation supplied by the sponsor or documentation supplied by the school during an on-site visit, and/or other materials that are publicly available.

To begin the validation process, the vendor randomly selects 20 items from the available pool of school-level items that can be validated through documentation submitted by the sponsors. Sponsors then submit the requested documentation for all schools in their portfolios. The vendor reviews the certification response submitted by the sponsor and information provided by the sponsor to make a preliminary compliance determination for the items.

The vendor randomly selects 10 additional items from the available pool of school-level items that can be validated through documentation and/or information provided by the Department. Sponsors do not need to submit any documentation for these 10 items. The vendor reviews the certification response submitted by the sponsor and information provided by the Department to make a preliminary compliance determination for the items.

As part of the validation review process and to remain consistent with the administrative rule, the vendor randomly selects a minimum 10 percent sample of each sponsor's schools, ensuring at least one of each type of school (site-based, e-school, and dropout prevention and recovery) is included in the sample for potential site visits. The vendor also randomly selects five items to be validated for the schools selected. The vendor reviews the certification response submitted by the sponsor and information gathered during the site visit to make a preliminary compliance determination for the items.

In addition, the vendor randomly selects six items from the available pool of sponsor-level items that can be validated through documentation submitted by the sponsors and/or information provided by the Department. The sponsors submit the requested documentation. The vendor reviews the certification response submitted by the sponsor and information provided by the sponsor and the Department to make a preliminary compliance determination for the items.

The preliminary compliance determination for each item is based on a combination of the sponsor's certification responses, as well as a review of the information for each item selected for validation.

Utilizing each submitted certification worksheet, the vendor will perform the review and validation and will enter the appropriate response in the two columns below for each compliance item for each sponsor and school:

- a. Reviewer Rating: The final compliant, not compliant and/or not applicable determination will be made by the vendor.
- b. Justification: Information will be included in the worksheet for each item to describe how the compliance status was determined based on a combination of sponsor responses, validation, a narrative and/or existence of a corrective action plan to address school deficiencies.

Following the vendor compliance review, sponsors will be provided an opportunity to review the vendor determinations as described in the Review Period section below.

Upon completion of all sponsor-requested reviews, the Department will calculate the score for the sponsor's rating on the identified Oversight item (S-615) based on the average percent of substantiated items for all schools in the sponsor's portfolio. The Department then will calculate the overall rating for the Compliance with

All Laws and Rules based upon the data provided by the vendor and any adjustments made following the Department review.

Score Calculation:

To calculate the sponsor oversight score that rolls into the sponsor worksheet, the following process applies:

- 1) Each school is evaluated separately on the percent of items considered substantiated.
- 2) For each sponsor, an average of the percentage of each school's overall substantiated items will be calculated.
- 3) That average will represent the sponsor's point determination for the "oversight of its schools' compliance" item based on the table below.

Points	Percentage of Substantiated School Items
4	98-100%
3	96-97.9%
2	94-95.9%
1	92-93.9%
0	Less than 92%

For each sponsor, the percent of substantiated sponsor items is calculated, and the final Compliance with ALL Applicable Laws and Rules component score and rating is determined by the scale outlined below. All sponsor compliance items are weighted equally, except for Item S-615, which has four possible points.

Points	Percentage of Substantiated Sponsor Items	Rating
4	92-100%	Exceeds Expectations
3	87-91.9%	Meets Expectations
2	84-86.9%	Progressing Toward Expectations
1	80-83.9%	Below Expectations
0	0-79.9%	Significantly Below Expectations

In addition to a data file that includes the sponsor-level data on the Compliance with All Applicable Laws and Rules component, the Department will publish files that include detailed school-level compliance data.

Quality Practices Component

The Department is required to prescribe quality practices for community school sponsors and develop an instrument to measure adherence to those quality practices. The quality practices must be based on standards developed by the National Association of Charter School Authorizers, or any other nationally organized community school organization, in consultation with entities that sponsor community schools.

The quality practices review consists of 33 individual standards, grouped into the following critical areas:

- a. Commitment and Capacity;
- b. Application Process and Decision-Making;
- c. Performance Contracting;
- d. Oversight and Evaluation;
- e. Termination and Renewal Decision-Making; and

f. Technical Assistance.

The final rating on the Quality Practices component is based on the percentage of total points earned.

Sponsor Participation/Submission: Each sponsor will have the opportunity to upload documents to Epicenter to address the individual standards of the rubric. Sponsors have the option to participate in interviews to further explain their supporting documentation.

Review Process: The Department engages a vendor to perform the quality review. Applicable vendor personnel will be provided with view-only access to Epicenter.

The reviewers will complete the rubric based on all available information and provide a score for each standard. Interview responses may not stand alone; they must be supported with documentation supplied by the sponsor.

Following the vendor completion of the Quality Practices Rubric, sponsors will be provided an opportunity to review the vendor ratings as described in the Review Period section below.

Upon completion of all sponsor-requested reviews, the Department will calculate the overall rating for quality practices based upon the data provided by the vendor and any adjustments made following the Department review.

Calculation Rules: The following business rules are used when calculating the sponsor's score on the quality practices component.

1. The rating is calculated using the following formula:

$$B/A \quad \text{where}$$

A = The number of possible points for standards that are applicable to the sponsor being reviewed.

B = The total points scored in the standards included in A.

2. The scores for each standard in the rubric are combined to determine the overall percentage and rating.
3. The final quality practices component rating and points are determined by the calculated overall percentage of standards met using the following:

Percentage	Rating	Points
90-100%	Exceeds Standards	4
75-89.9%	Meets Standards	3
55-74.9%	Progressing Toward Standards	2
35-54.9%	Below Standards	1
0-34.9%	Significantly Below Standards	0

Review Period

Sponsor Adjustment Request: Upon completion of the vendor review, the Department will make the completed compliance worksheets and quality rubric available to the sponsor. The sponsor will be provided a period of 10 business days in which it may request an adjustment based on documentation previously submitted as part of the evaluation. The sponsor will provide to the Department any necessary evidence or information to support the requested adjustment. The Department will review the evidence and information, determine whether an adjustment is valid and notify the sponsor of its determination and reasons. A sponsor requesting adjustments must complete a request form and submit it to the Department using Epicenter. The request must identify the specific item(s) for which the sponsor is requesting adjustment.

Department Review: The Department will review the submitted request and the originally submitted documentation to make a determination of whether the item score should be changed prior to performing calculation of the final sponsor score.

Overall Rating

Calculation Rules: The following business rules are used when calculating the sponsor's overall score on the sponsor evaluation.

1. The overall rating is based on the ratings in the three components:
 - a. Academic Performance;
 - b. Compliance with All Applicable Laws and Rules; and
 - c. Quality Practices.
2. All three components are weighted equally. The points scored for each component are added together to provide a summative score. Before applying the two business rules, the initial overall rating is determined by the following summative score:

Overall Points	Sponsor Rating
10, 11, 12	Exemplary
7, 8, 9	Effective
3, 4, 5, 6	Ineffective
0, 1, 2	Poor

3. In some limited cases, sponsors will not have any available academic data as mandated by ORC 3314.016 (B) (2). For example, if a sponsor only had one school, which is an excluded special needs school, it would not have ANY academic performance data. In these limited cases, the sponsor will be evaluated based on the two available components, which will follow the above rules, but the summative rating will be determined based on the following 8-point scale:

Overall Points	Sponsor Rating
7, 8	Exemplary
5, 6	Effective
2, 3, 4	Ineffective
0, 1	Poor

4. The final overall rating is determined after applying the following additional business rules, which equally apply to all of the components:
 - a. A sponsor can score no better than "Ineffective" if it receives zero points in any component.
 - b. If a sponsor scores zero in any two components, then the overall rating is "Poor."