

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

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Technical Review Coversheet

Applicant: Colorado Department of Education (S282D240005)  
Reader #1: \*\*\*\*\*

	Points Possible	Points Scored
Questions		
Selection Criteria		
Need For Facility Funding		
1. Need For Facility Funding	30	25
Quality Of Plan		
1. Quality Of Plan	40	34
The Grant Project Team		
1. The Grant Project Team	10	10
The Budget		
1. The Budget	10	7
State Experience		
1. State Experience	10	10
Sub Total	100	86
Priority Questions		
Competitive Preference Priority		
Competitive Preference Priority		
1. CPP	10	10
Sub Total	10	10
Total	110	96

# Technical Review Form

Panel #2 - SFIG Panel - 2: 84.282D

Reader #1: \*\*\*\*\*

Applicant: Colorado Department of Education (S282D240005)

## Questions

### Selection Criteria - Need For Facility Funding

#### 1. (a) Need For Facility Funding (30 points).

(1) The need for per-pupil charter school facility funding in the State.

(2) The extent to which the proposal meets the need to fund charter school facilities on a per-pupil basis.

#### Strengths:

Grant Applicant Colorado Department of Education (hereinafter CDE) cites a range of publicly available data to support the need for additional per-pupil charter school facility funding in the state. It begins with CDE's reporting that during FY 2022-2023 Colorado charter schools spent [REDACTED] more per-pupil funds for facilities expenses than did non-charter schools. (P. e16.)

- Colorado charter schools frequently lack full-service facilities or need significant maintenance projects. (P. e18.) That increases their costs and need for facilities assistance, including technical assistance related to all aspects of facility procurement and operations.
- State financial data indicates Colorado charter schools have a significantly higher reliance on school level and per-pupil funds for facilities than do non-charter schools. (P. e15.) That indicates charter schools have narrower options for funding their facility needs.
- Price increases cause charter schools to spend more of their operating expenses on facilities: [REDACTED] compared to [REDACTED] for non-charter schools. (P. e16.) That documents the extent to which charter schools are at a disadvantage when relying on their operating revenues to fund both their programs and facilities.
- Although recent estimates indicate charter schools receive higher shares of local bond measures than in recent years, significant gaps remain and compound over time. (P. e15.) CDE reports that since passage of the state's Charter Schools Act, charter schools received [REDACTED] of the revenue from local voter-approved school district bond measures. (Pp. e16-17.) That indicates bond measures are not yet the solution for closing the facilities funding gap between charter and non-charter schools.
- Despite state legislative efforts to improve funding equity between districts and charter schools, remaining funding gaps and facility cost increases continue to make it difficult for charter schools to secure long term financing at market or more favorable rates. (P. e17.) That finding adds evidence of a need for alternative or additional assistance for charter schools to be able to compete for long term facility financing.
- Compared to public school districts, Colorado charter schools often lack comprehensive administrative structures or expertise in facilities planning, financing, and operations. (P. e18.) That finding is consistent with the technical assistance proposed at pages e34-37 of CDE's SFIG application.
- Beginning in 2001 Colorado acted in response to facility funding gaps between districts and charter schools by creating facilities aid programs. (P. e14.) For example, districts can make space available for charter schools, can't charge rent, but can charge maintenance fees. About 26% of Colorado's charter schools operate in district buildings. (Pp. e19-20.) Various state programs help charter schools lower their borrowing costs. (P. e20.) The state includes charter schools in a program to help Colorado schools repair or replace their most needy facilities. (P. e21.) Despite those actions, significant per-pupil and other facility funding gaps between charter and non-charter schools remain. (P. e19.)

CDE intends to reduce the pressure on charter schools' per-pupil revenue (PPR) to cover long-term facility expenses by using SFIG funds to enhance the Colorado's Charter Capital Assistance Program (CCAP). (P. e22-23.) The statewide

CCAP is available to all Colorado charter schools. (P. e31.) CDE would calculate its SFIG per-pupil facilities assistance using the CCAP formula. CDE reports because SFIG and CCAP funds would be managed separately, and because fewer schools will be eligible for SFIG funds, CDE would be able to maximize funding available to schools with highest needs. (P. e31.)

#### **Weaknesses:**

At page e47 CDE reports it anticipates most Colorado charter schools will apply to participate in CDE's proposed program. The application lacks data supporting that expectancy. It is unclear if the CDE used its distribution list tools described at page e26 to survey charter school operators or stakeholders to collect information showing what percentage of Colorado's charter schools might apply.

Each table at page e122 and e449 CDE estimates of the number of subgrants it would make during the five-year term of its proposed project. The estimated number of subgrants factors into the estimated per-pupil amounts on those pages. A search of the application did not reveal a description of how CDE determined those estimated numbers of subgrants. Without that information it is unclear to what degree those estimates indicate the extent to which CDE's proposal meets the per-pupil need to fund charter schools facilities.

After factoring in SFIG and state funds, CDE reports a combination of the SFIG and state funds and CDE's proposed technical assistance and training program would increase participating charter schools' funding by [REDACTED] per student in each of the five grant years. (P. e13. P. e23.) A search of the application did not reveal a description of the formula CDE used to determine that [REDACTED] per student increase. Without that it is unclear how a sample charter school would realize that increase because of CDE's proposal.

It is unclear if or how CDE determined that [REDACTED] per student annual saving is a sufficient offset against the average [REDACTED] difference described at page e16 between what charter schools paid and non-charter schools paid per student for facilities in FY 2022-2023.

**Reader's Score:** 25

#### **Selection Criteria - Quality Of Plan**

##### **1. (b) Quality Of Plan (40 points).**

- (1) The likelihood that the proposed grant project will result in the State either retaining a new per-pupil facilities aid program or continuing to enhance such a program without the total amount of assistance (State and Federal) declining over a five-year period.**
- (2) The flexibility charter schools have in their use of facility funds for the various authorized purposes.**
- (3) The quality of the plan for identifying charter schools and determining their eligibility to receive funds.**
- (4) The per-pupil facilities aid formula's ability to target resources to charter schools with the greatest need and the highest proportions of students in poverty.**
- (5) For projects that plan to reserve funds for evaluation, the quality of the applicant's plan to use grant funds for this purpose.**
- (6) For projects that plan to reserve funds for technical assistance, dissemination, or personnel, the quality of the applicant's plan to use grant funds for these purposes.**

**Strengths:**

CDE's application Goal 1 at page e22-23 is to use SFIG funds to enhance the state's charter schools facilities assistance program. Goal 2 at page e 23 is to strengthen capacity within the state for high-quality charter facilities management. Each goal contributes to the likelihood that CDE's use of SFIG funds would enhance its proposed per-pupil facilities aid program.

The Colorado legislature approved a [REDACTED] one-time increase to its charter schools facility assistance program during the five-year term of CDE's proposed SFIG program. (P. e13. P. e22. P. e23.) One legislative purpose is to control for variables that could otherwise cause fluctuations in the amount of state funds available for the facility assistance program. (P. e22.) The legislature also specifically called for the CDE to apply for this SFIG grant. (P. e14.) Those legislative actions, combined with CDE's proposed equal annual allocations of state and SFIG fund shares at page e24, and the information in the table at page e122 titled Projected number of Colorado subgrant applicants and targeted number of Subgrant Awards indicate CDE's proposed total facilities aid to charter schools would not decline during the five-year period of CDE's proposed SFIG program.

Colorado charter schools are eligible to receive facilities assistance funds provided funds are used for capital construction. The state's definition of capital construction includes land acquisition through lease or purchase, demolition, construction, maintenance, and financing for those purposes. (P. e25.) That broad definition of capital construction gives subgrant recipient charter schools flexible options for using SFIG funds.

CDE's application provides details describing its proposed process for identifying subgrantees and determining their eligibility to receive SFIG funds. That indicates CDE's commitment to ensuring it uses SFIG funds consistent with the SFIG's purposes and requirements.

- CDE communicates regularly with state charter schools and their key stakeholders through distribution lists. (P. e26.) That indicates an efficient and timely method for notify schools and stakeholders about the SFIG and subgrant application process.
- CDE maintains timely records regarding charter schools statewide. That is another charter school point of contact resource available to CDE. (P. e27.)
- CDE has a process for drafting and implementing a SFIG subgrant application process with includes release of the request for applications and the application process itself. That indicates CDE's commitment to a standard and transparent subgrant application process for all schools. (Pp. e27-28.)
- CDE's proposed subgrantee identification process includes incentives for applicants to propose using subgrant funds for charter schools' common needs: payments for rent or for facility financing debt service. (P. e29.) That indicates CDE recognizes areas of high need and an opportunity to focus on uses of SFIG funds that are easiest to account for and monitor.
- CDE's proposed process for identifying eligible SFIG subgrant applicants includes trainings for schools, especially established schools with longer operating histories or schools offering preschool programs, which may for various reasons need to make necessary operational or other changes to become eligible to apply for an SFIG subgrant. (Pp. e28-29.) That indicates CDE's commitment to a fair and equitable subgrant application process.

Colorado's Charter Capital Assistance Program (CCAP) is available to all Colorado charter schools. (P. e31.) CDE proposes to calculate its SFIG per-pupil facilities assistance using the CCAP formula. CDE reports it would maximize funding available to schools with highest needs because SFIG and CCAP funds would be managed separately, and because fewer schools will be eligible for SFIG funds. (P. e31.)

At pages e31-32, CDE details a plan for both measuring implementation of the grant and improvements in charter school operations. The proposed performance measures align with its Goal 1 at page e22-23 to use SFIG funds to enhance the state's charter schools facilities assistance program and with Goal 2 at page e 23 to strengthen capacity within the state for high-quality charter facilities management. The performance measure targets are specific, measurable, and time limited. CDE's proposed performance measures would provide the SFIG grantee and grantor specific and valuable information about the implementation and impact of the grant activities.

CDE provides a detailed description of its proposed SFIG technical assistance plan. The plan indicates CDE recognizes specific needs and plans to align its technical assistance with those needs.

- CDE reports data indicating Colorado charter schools often lack comprehensive administrative structures or expertise in facilities planning, financing, and operations. (P. e18.) To meet that need, CDE proposes to use SFIG funds to create Charter School Facility Finance Certification Program. CDE would model its Certification Program on existing and successful state certification programs. The training would be public and free of charge. It would focus on charter school leaders, financial officers, board members, and authorizers. An advisory board would identify a progression of courses leading to the intended certification. (P. e34.) Implementation of the proposed certification program would include these phases: Planning and Development, Implementation, Monitoring, and Evaluation. (Pp. e34-36.) CDE's proposed certification program would be a strong response to a specific identified need.
- CDE's technical assistance would include training on the state's Facility Insight program. That would help charter school leaders understand their facilities' needs and how to plan to correct them. Including the Facility Insight training indicates CDE recognizes school leaders need to better understand their facility needs and how to prioritize and plan to respond to them.

#### **Weaknesses:**

A search of the application did not reveal CDE's timeline for its proposed subgrantee application process described at pages e28-29. Without that it is unclear how CDE would align the subgrantee application process with other grant operations.

CDE reports its proposed SFIG program would maximize funding available to schools with highest needs because SFIG funds would be managed separately, and because fewer schools will be eligible for SFIG funds. (P. e31.) The application lacks a description of how CDE would identify those schools with highest needs.

**Reader's Score: 34**

#### **Selection Criteria - The Grant Project Team**

##### **1. (c) The Grant Project Team (10 points).**

- (1) The qualifications, including relevant training and experience, of the project manager and other members of the grant project team, including employees not paid with grant funds, consultants, and subcontractors.**
- (2) The adequacy and appropriateness of the applicant's staffing plan for the grant project.**

#### **Strengths:**

At pages e40-41 CDE explains it will fill these positions during the period between confirmation of a grant award and the beginning of the grant period: Grant Manager, Grants Fiscal Analyst, and Training Program Lead. CDE also explains it is hiring its Director of Charter Schools. That information clarifies the application could not yet include resumes for individuals in those positions.

At page e38 CDE provides a visual illustrating the proposed three tiers of leadership for the proposed SFIG program: Operational (an administrative structure that complies with regulations), Organizational (strengthens CDE's charter facilities operations), and Community (engages community partners to help guide the program, identify opportunities, strengthen accountability). A review of the resumes at the pages cited indicate the persons serving in the named tier of leadership or on the named committee have the experience and qualifications to do so. That indicates CDE's commitment to staffing its proposed SFIG program with qualified persons who will help ensure it meets its goals and objectives.

- Operational Leadership: NA. Positions are being hired or to be hired.
- Organizational Leadership members' resumes are at pages e86-88, e89-91, e92-93, and e94-96.
- Community Leadership includes two committees. The Charter School Finance Training Advisory Committee members' resumes are at pages e107, e110-117, and e348-340. The Management Accountability Committee members'

resumes are at pages e97-106.

CDE provides a thorough staffing plan for the proposed project. The visual at page e38 clearly describes the relationship among the three leadership tiers. Core leadership team members are also members of the Organizational Leadership Tier and are qualified for their positions. At pages e45-46 CDE documents the outline of its grant management plan which includes establishing the three leadership tiers, making necessary hires to fill leadership team positions, executing the plan, and evaluating the effectiveness of the grant's activities. CDE's management plan assigns specific responsibilities to the Director of Charter Schools and SFIG Grant Supervisor at page e40, Grant Manager at pages e38-39, Grant Fiscal Analyst at page e39, and the Training Program Lead at pages e39-40. CDE's comprehensive plan for management of the SFIG grant indicates CDE's intent for the grant to be accountable and successful.

**Weaknesses:**

No weaknesses noted.

**Reader's Score:** 10

**Selection Criteria - The Budget**

**1. (d) The Budget (10 points).**

**(1) The extent to which the requested grant amount and the project costs are reasonable in relation to the objectives, design, and potential significance of the proposed grant project.**

**(2) The extent to which the costs are reasonable in relation to the number of students served and to the anticipated results and benefits.**

**(3) The extent to which the non-Federal share exceeds the minimum percentages (which are based on the percentages under section 4304(k)(2)(C) of the ESEA), particularly in the initial years of the program.**

**Strengths:**

Given the data reported in the table at page e122 titled Projected number of Colorado subgrant applicants and targeted number of Subgrant Awards, the requested grant amount and costs are reasonable in relation to CDE's proposed SFIG project goals and objectives. (An identical table is at page e449.) The page e122 data indicate during years 2-5 of the grant the total amount of assistance does not decrease while the numbers of schools and students served increase. CDE provides other information demonstrating these component costs charged to the SFIG are also reasonable given the data at page e122: personnel costs and FTEs at page e123 and e127, and conference, grant management, and travel costs at pages e123-124. CDE provides reasonable costs for health, life insurance, and other employee fringe benefits. They are based on estimates provided by Colorado's budget office and on formula calculations for Colorado's state pension system, Medicare, and for short term disability coverage. (P. e124. P. e128. P. e451. P. e454.)

Data from the table at page e120 titled Financial projections for meeting state match requirements and applicable revenue buffers indicates CDE's contribution of non-federal funds appropriately meets the match requirement in Section III, Part 2. a., at page 31153 of the NIA. Applying the formula CDE'S Annual State [REDACTED] Total Annual Project Cost= State Match Percentage calculates CDE's state match percentages for each of the five grant years are [REDACTED]%. Those are the minimums required by the NIA.

CDE's application narratives at pages e26, e30, and e42 indicate CDE would take appropriate actions to ensure CDE and its subgrantees comply with the Page 31153, Section III, Part 2.b., NIA requirement that grantees must use SFIG funds to supplement, not supplant state and local public funds.

At page e461 CDE acknowledges that its proposed SFIG program is subject to the Build America, Buy America Act (BABAA). At page e26 CDE's application states CDE would more closely monitor any subgrantee's use of funds that could trigger BABAA requirements.

**Weaknesses:**

In the table at page e122 CDE estimates of the number of subgrants made and total numbers of charter students served during the five-year term of the proposed project. A search of the application did not reveal a description of how CDE determined those estimates. Without that information it is difficult to conclude with certainty to what degree the requested grant amount is reasonable in relation to the numbers of schools and students served. It is also unclear to what extent the budgeted costs are reasonable in relation to the number of students served.

CDE's application lacks an explanation of whether CDE has considered or would consider seeking a waiver from the BABAA as permitted by Section III, Part 3, at page 3114 of the NIA. It also lacks an explanation of how CDE would respond if a subgrantee's use of funds triggers application of the BABAA.

**Reader's Score:**      **7**

**Selection Criteria - State Experience**

**1. (e) State Experience (10 points).**

**(1) The experience of the State in addressing the facility needs of charter schools through various means, including providing per-pupil aid and access to State loan or bonding pools.**

**Strengths:**

With support and direction from and funding authorized by the state's legislature, CDE has over two decades of experience providing millions of dollars in facilities assistance through multiple programs. (Pp. e14, e19-20, e21.) That experience is transferable to the management of CDE's proposed SFIG project.

**Weaknesses:**

No weaknesses noted.

**Reader's Score:**      **10**

**Priority Questions**

**Competitive Preference Priority - Competitive Preference Priority**

**1. (1) Competitive Preference Priority:**

**Applicants that have not previously received a grant under the program.**

**Strengths:**

CDE is not on the list of previous SFIG grantees provided by the U.S. Department of Education.



**Weaknesses:**

No weakness noted.

**Reader's Score:**     **10**

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Reader #2: \*\*\*\*\*

	Points Possible	Points Scored
Questions		
Selection Criteria		
Need For Facility Funding		
1. Need For Facility Funding	30	24
Quality Of Plan		
1. Quality Of Plan	40	35
The Grant Project Team		
1. The Grant Project Team	10	10
The Budget		
1. The Budget	10	9
State Experience		
1. State Experience	10	10
Sub Total	100	88
Priority Questions		
Competitive Preference Priority		
Competitive Preference Priority		
1. CPP	10	10
Sub Total	10	10
Total	110	98

# Technical Review Form

**Panel #2 - SFIG Panel - 2: 84.282D**

**Reader #2:** \*\*\*\*\*

**Applicant:** Colorado Department of Education (S282D240005)

## Questions

### Selection Criteria - Need For Facility Funding

#### 1. (a) Need For Facility Funding (30 points).

(1) The need for per-pupil charter school facility funding in the State.

(2) The extent to which the proposal meets the need to fund charter school facilities on a per-pupil basis.

#### Strengths:

(a)(1): The narrative effectively demonstrates the historical context and continuous demand for charter schools in Colorado, emphasizing the state's three-decade experience and consistent enrollment growth despite overall public school enrollment decline (Page e11).

The application presents a thorough analysis of funding disparities between charter and non-charter schools, highlighting significant financial disadvantages for charter schools in facility management (Page e15).

The data supporting the need for facility funding is robust, particularly the comparison of per-pupil spending between charter and non-charter schools and the reliance on operational budgets to cover facility expenses (Page e16).

The narrative discusses legislative efforts that have improved funding equity but notes the ongoing challenges charter schools face, particularly in long-term facility financing and rising costs (Page e17).

The application emphasizes the increasing costs of construction, real estate, and interest rates, further justifying the need for per-pupil facility funding to alleviate the financial burden on charter schools (Page e17).

(a)(2): The proposal outlines existing state support structures, such as making facilities available at low or no cost, the intercept and moral obligation programs, and charter school inclusion in local bond projects (Page e19).

The narrative highlights the success of programs like CECFA's moral obligation program, which has saved charter schools over \$ [REDACTED] in interest payments, demonstrating the proposal's potential to meet funding needs (Page e20).

The proposal presents the Charter School Capital Construction Program (CCAP) as a well-established initiative that will be enhanced by the requested federal funds, aligning with the goal of meeting facility needs on a per-pupil basis (Page e21).

The application discusses the state's legislative actions to increase funding for the Charter School Capital Construction Program, including a significant one-time appropriation and an additional [REDACTED] over five years (Page e21).

#### Weaknesses:

(a)(1): The narrative relies heavily on historical data and past legislative actions, which, while informative, could benefit from more forward-looking projections or analysis of emerging trends that might impact future funding needs (Page e18). While the application discusses the funding disparities between charter and non-charter schools, it could be strengthened by providing more detailed case studies or examples of specific charter schools struggling with facility funding (Page e16). The application briefly mentions the challenges of long-term facility financing but does not delve deeply into alternative solutions or strategies beyond state legislative actions (Page e17).

(a)(2): The proposal provides a comprehensive overview of existing support structures but does not fully address potential challenges in expanding these programs or integrating federal funds into the existing state framework (Page e20).

The narrative could be strengthened by discussing how the proposed funding model would adapt to fluctuations in state revenue or changes in charter school enrollment over the grant period (Page e21).

The application does not provide a clear plan for how the per-pupil funding formula will be adjusted or scaled to account for differences in charter school needs, particularly for those in rural or high-need areas (Page e21).

## Selection Criteria - Quality Of Plan

### 1. (b) Quality Of Plan (40 points).

- (1) The likelihood that the proposed grant project will result in the State either retaining a new per-pupil facilities aid program or continuing to enhance such a program without the total amount of assistance (State and Federal) declining over a five-year period.
- (2) The flexibility charter schools have in their use of facility funds for the various authorized purposes.
- (3) The quality of the plan for identifying charter schools and determining their eligibility to receive funds.
- (4) The per-pupil facilities aid formula's ability to target resources to charter schools with the greatest need and the highest proportions of students in poverty.
- (5) For projects that plan to reserve funds for evaluation, the quality of the applicant's plan to use grant funds for this purpose.
- (6) For projects that plan to reserve funds for technical assistance, dissemination, or personnel, the quality of the applicant's plan to use grant funds for these purposes.

#### Strengths:

(b)(1) The proposal is strongly supported by the commitment from the Colorado General Assembly, which has already approved [REDACTED] in additional funding over the next five years, indicating a high likelihood that the state will enhance and sustain the program beyond the grant period (Page e13).

The proposal includes a clear and detailed financial model that projects charter enrollment growth and overall K-12 declines, providing a realistic framework for continued program funding without a decline in total assistance (Page e23). The narrative demonstrates an understanding of the variables that impact state funding, such as excise tax revenues and formula calculations, and presents a plan to mitigate risks through additional state appropriations (Page e23).

The proposal outlines a multi-year funding strategy with specific amounts and contingencies to ensure that the program will not face a decline in resources, even in the face of potential revenue fluctuations (Page e24).

(b2) The proposal clearly defines the broad range of allowable uses for facility funds under the Charter School Capital Construction Program (CCAP), providing charter schools with significant flexibility to address their unique facility needs (Page e25).

The application describes a tiered monitoring structure that allows for varying levels of oversight based on the complexity of the fund's use, ensuring that charter schools can utilize the funds flexibly while maintaining compliance with federal regulations (Page e25).

The plan to integrate federal funds into the existing state framework is well-conceived, with provisions for charter schools to use the funds for a wide array of capital construction activities, enhancing the program's utility (Page e25).

(b4) The proposal effectively utilizes the existing CCAP formula, which accounts for the type of facility a charter school operates in (district-owned versus independently leased or owned), ensuring that resources are allocated based on need (Page e30).

The plan to administer federal funds separately from state funds, while using the same per-pupil formula, allows for a targeted approach that maximizes support for high-need schools (Page e30).

The narrative demonstrates an understanding of the varying needs of charter schools and proposes a systematic method for ensuring that those with the greatest need receive the appropriate level of funding (Page e30).

(b5) The proposal outlines specific, measurable outcomes for evaluating the success of the grant, including detailed targets for fund reimbursement, increases in charter school participation, and the use of facility condition assessments (Page e31).

The evaluation plan includes the creation of a public dashboard to monitor progress, adding a layer of transparency and

accountability to the grant administration (Page e32).

The plan involves collaboration with multiple oversight groups, including the CDE Core Team and the SFIG Stakeholder Accountability Committee, ensuring comprehensive evaluation and continuous improvement (Page e33).

(b6) The proposal includes the development of a Charter School Facility Finance Certification Program, which addresses a critical need for technical expertise in long-term facility planning and financial management among charter school leaders (Page e34).

The narrative outlines a clear plan for the program's implementation, including the establishment of an advisory board, curriculum development, and ongoing evaluation, ensuring that the program will meet the needs of participating schools (Page e35).

The plan leverages existing state resources, such as the Facility Insight program, and integrates them into the technical assistance provided to charter schools, enhancing the program's effectiveness (Page e35).

#### **Weaknesses:**

(b)(1): The proposal, while strong in financial planning, could benefit from more detailed contingency plans in case of significant economic downturns or unexpected legislative changes that could impact state funding (Page e23).

The reliance on projected enrollment growth and excise tax revenue could pose a risk if these projections do not materialize as expected, which could threaten the sustainability of the program (Page e23).

(b)(2): While the proposal offers flexibility, it does not fully address how charter schools in unique situations (e.g., those facing rapidly changing demographic or financial circumstances) might need additional guidance or support to maximize the use of these funds (Page e25).

The tiered monitoring approach, though practical, might impose an additional burden on smaller charter schools that lack administrative capacity, potentially limiting their ability to fully utilize the flexibility offered (Page e25).

(b)(3): The proposal could be strengthened by including more detailed plans for continuous communication and support to ensure that all eligible charter schools, particularly those in underserved areas, are fully aware of and able to access the funding (Page e26).

While the application process is well thought out, there could be more emphasis on streamlining it to minimize the administrative burden on smaller or less resourced charter schools (Page e27).

(b)(4): The proposal does not sufficiently address how the formula might be adapted or revised over time to account for changing needs or demographics within the charter school population (Page e30).

The narrative could benefit from more explicit examples of how the funding formula has successfully targeted high-need schools in the past, providing a stronger rationale for its continued use (Page e30).

(b)(5): The proposal, while comprehensive, could include more specific details on how evaluation findings will be used to inform ongoing program adjustments and improvements (Page e31).

The plan could benefit from a clearer explanation of how stakeholder feedback, particularly from charter school leaders, will be integrated into the evaluation process (Page e32).

(b)(6): While the certification program is a strong component, the proposal could provide more details on how the program will be scaled or expanded if demand exceeds initial projections (Page e35).

The narrative could include a more detailed plan for the dissemination of best practices and lessons learned from the certification program to a broader audience beyond the initial participants (Page e35).

**Reader's Score: 35**

#### **Selection Criteria - The Grant Project Team**

##### **1. (c) The Grant Project Team (10 points).**

**(1) The qualifications, including relevant training and experience, of the project manager and other members of the grant project team, including employees not paid with grant funds, consultants, and subcontractors.**

**(2) The adequacy and appropriateness of the applicant's staffing plan for the grant project.**

**Strengths:**

(c)(1): The project team is well-qualified, with the Director of Charter Schools possessing significant experience in managing state-level charter school programs and federal grants, ensuring strong leadership (Page e37).

The SFIG Grant Manager brings extensive experience in federal grant administration, including overseeing subgrant applications, managing monitoring procedures, and reporting, which is critical for the successful implementation of the grant (Page e38).

The Grants Fiscal Analyst has a solid background in financial management, ensuring compliance with federal and state financial regulations, which is essential for maintaining fiscal integrity throughout the grant period (Page e39).

The Training Program Lead is well-prepared to develop and implement the Charter School Facility Finance Certification Program, having experience in organizing educational programs and tracking participant progress, which will contribute to the success of the grant's technical assistance component (Page e39).

(c)(2): The staffing plan is comprehensive and well-structured, with clear delineation of roles and responsibilities across operational, organizational, and community leadership tiers, ensuring that all aspects of the grant are effectively managed (Page e37).

The proposal includes a plan to leverage existing staff experience while bringing in new hires to fill specific roles, which ensures both continuity and the introduction of new expertise where needed (Page e40).

The plan to use the full [REDACTED] of administrative expense to fully implement the project, with most funding dedicated to managing the subgrant process, demonstrates a strategic allocation of resources to ensure efficient and effective grant administration (Page e46).

The collaboration across the Schools of Choice Unit, the Capital Assistance Office, and the Grants Fiscal Management Unit ensures that the grant's fiscal and programmatic components are managed in an integrated and cohesive manner (Page e46).

**Weaknesses:**

No weaknesses were noted.

**Reader's Score:** 10

**Selection Criteria - The Budget****1. (d) The Budget (10 points).**

**(1) The extent to which the requested grant amount and the project costs are reasonable in relation to the objectives, design, and potential significance of the proposed grant project.**

**(2) The extent to which the costs are reasonable in relation to the number of students served and to the anticipated results and benefits.**

**(3) The extent to which the non-Federal share exceeds the minimum percentages (which are based on the percentages under section 4304(k)(2)(C) of the ESEA), particularly in the initial years of the program.**

**Strengths:**

(d)(1): The budget is well-aligned with the project's objectives and design, particularly in dedicating [REDACTED] of subgrants to eligible charter schools, which ensures that the majority of funds are directly supporting the intended beneficiaries (Page e48).

The allocation of resources to both the subgrant management and the technical assistance components is balanced and strategic, ensuring that the project will achieve its goals without unnecessary expenditure (Page e48).

The proposed budget for the Training Program is ambitious yet reasonable, considering the in-kind contributions from senior leaders in public education and charter school finance, which significantly boosts the program's cost-effectiveness (Page e48).

(d)(2):The budget anticipates funding for schools serving 60% of the charter population in the first year, with an increase in participation over the grant period, demonstrating a scalable approach that maximizes the number of students benefiting from the grant (Page e48).

The cost per student decreases over time as more schools participate, indicating efficient use of funds and a high return on investment as the program scales (Page e48).

The new single grant application portal for all state grants will streamline the application process, reducing administrative costs and improving efficiency, which further justifies the budget as reasonable in relation to the anticipated benefits (Page e48).

(d)(3) The [REDACTED] infusion from the Colorado General Assembly provides a significant buffer beyond the required state match, ensuring that the non-Federal share consistently exceeds the minimum percentages throughout the grant period (Page e49).

The budget projections indicate a solid financial foundation, with an additional [REDACTED] in facility support beyond the state match, which underscores the state's commitment to sustaining the program and exceeding federal requirements (Page e49).

**Weaknesses:**

(d)(3): The budget is heavily reliant on additional state funds, specifically the [REDACTED] infusion from the Colorado General Assembly as detailed on appendix page A-70. Any unforeseen budgetary constraints at the state level could impact the availability of these funds, potentially jeopardizing the ability to meet the non-Federal share requirement in the later years of the grant, especially as the Federal contribution decreases over time (Page e49).

**Reader's Score:** 9

**Selection Criteria - State Experience**

**1. (e) State Experience (10 points).**

**(1) The experience of the State in addressing the facility needs of charter schools through various means, including providing per-pupil aid and access to State loan or bonding pools.**

**Strengths:**

(e)(1):Colorado has a well-established history of addressing the facility needs of charter schools, particularly through its 23-year administration of the Charter School Capital Construction Fund, which has successfully supported charter schools across the state with over \$ [REDACTED] in additional funds (Page e18).

The state has demonstrated a proactive approach in enhancing its facility funding mechanisms over time, with significant legislative actions such as the passage of HB24-1448, which authorized an additional [REDACTED] for the Charter School Capital Assistance Program over the next five years, further solidifying its commitment to charter school facilities (Page e23).

Colorado has implemented several innovative financial support programs, such as the Intercept Program and the Moral Obligation Program, which have collectively saved participating charter schools over \$ [REDACTED] in interest payments, providing a substantial financial advantage to these schools (Page e20).

The state's inclusion of charter schools in the Building Excellent Schools Today (BEST) program has shown improvement over time, with charter schools now receiving a larger share of BEST funding, highlighting the state's growing commitment to equitably support charter school facilities (Page e20).

**Weaknesses:**

No weaknesses noted.

**Reader's Score:** 10

## **Priority Questions**

### **Competitive Preference Priority - Competitive Preference Priority**

#### **1. (1) Competitive Preference Priority:**

**Applicants that have not previously received a grant under the program.**

#### **Strengths:**

The applicant has not previously received a grant under this specific program, making them eligible for the competitive preference priority. This is clearly stated within the narrative and supported by their historical grant application data (Page e3).

#### **Weaknesses:**

The applicant has met the criteria for full credit.

**Reader's Score:** 10

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**Status:** Submitted

**Last Updated:** 08/29/2024 01:49 PM



Status: Submitted  
Last Updated: 08/29/2024 01:49 PM

Technical Review Coversheet

Applicant: Colorado Department of Education (S282D240005)  
Reader #3: \*\*\*\*\*

	Points Possible	Points Scored
Questions		
Selection Criteria		
Need For Facility Funding		
1. Need For Facility Funding	30	30
Quality Of Plan		
1. Quality Of Plan	40	36
The Grant Project Team		
1. The Grant Project Team	10	10
The Budget		
1. The Budget	10	9
State Experience		
1. State Experience	10	10
Sub Total	100	95
Priority Questions		
Competitive Preference Priority		
Competitive Preference Priority		
1. CPP	10	10
Sub Total	10	10
Total	110	105

# Technical Review Form

Panel #2 - SFIG Panel - 2: 84.282D

Reader #3: \*\*\*\*\*

Applicant: Colorado Department of Education (S282D240005)

## Questions

### Selection Criteria - Need For Facility Funding

#### 1. (a) Need For Facility Funding (30 points).

(1) The need for per-pupil charter school facility funding in the State.

(2) The extent to which the proposal meets the need to fund charter school facilities on a per-pupil basis.

#### Strengths:

The proposal is well written showing experience with per pupil funding as well as convincing evidence supporting the need for increased facility funding.

The proposal clearly outlines the substantial differences in charter school facility funding as compared to non-charter schools. Disparities in bond proceeds as well as fewer charter schools receiving Building Excellent Schools Today (BEST) grants because the matching funds are more difficult to come by without bond proceeds (Page e17). Construction costs and interest rates details show marked increases as compared to per pupil revenue (Page e18). A lack of facility, finance, and construction management among charter school leaders is described as causing significant challenges and disparities as compared to non-charter schools (Page e18).

The proposal also documents the growth in charter school students each year (2,000-3,000 per year) as compared to the loss in students in non-charter schools (1,000 each year), strong academic outcome of charter schools compared to non-charter schools (Page e12), and the public desire for diverse schools of choice. With many charter schools utilizing annual per pupil funding for facilities as well as operations, these factors provide further evidence that more dedicated per pupil facility funding is needed so that charter schools of choice can continue create, expand, and sustain high-quality academic programs (Page e12-e13).

The proposal meets the needs outlined by providing [REDACTED] in per-pupil funding annually from grant funds that will support charter facility needs as well as provide matching funds that can be used as part of the BEST grant. The Colorado General Assembly will also infuse [REDACTED] into the project over the five-year period which is above the required match and will increase the per pupil funding even further (Page e14). The project will provide training for charter school leaders in facility management, finance, construction management, that will lead to better decision making and use of funds. The increase per pupil funding will help to offset increased construction costs and interest rates. The proposal plan will expand upon and complement the current State Facilities Incentive Grant (SFIG).

#### Weaknesses:

None noted.

Reader's Score: 30

## Selection Criteria - Quality Of Plan

### 1. (b) Quality Of Plan (40 points).

- (1) The likelihood that the proposed grant project will result in the State either retaining a new per-pupil facilities aid program or continuing to enhance such a program without the total amount of assistance (State and Federal) declining over a five-year period.
- (2) The flexibility charter schools have in their use of facility funds for the various authorized purposes.
- (3) The quality of the plan for identifying charter schools and determining their eligibility to receive funds.
- (4) The per-pupil facilities aid formula's ability to target resources to charter schools with the greatest need and the highest proportions of students in poverty.
- (5) For projects that plan to reserve funds for evaluation, the quality of the applicant's plan to use grant funds for this purpose.
- (6) For projects that plan to reserve funds for technical assistance, dissemination, or personnel, the quality of the applicant's plan to use grant funds for these purposes.

#### Strengths:

The proposal provides strong evidence that the grant project will result in enhancement to a well-established State per-pupil facility aid program. The proposal describes the Colorado General Assembly's support of per-pupil facilities aid with details of the current Charter Capital Assistance Program and the approved a [REDACTED], five-year funding plan to support this project, Colorado Charter School Facilities Assistance Project (Page e21-e22 -12, e24-e25). The amount dedicated is above the required match and will provide increased funding for the project period and will increase the likelihood that that proposed project will continue once funding ends. Although the funding has some variables, the proposal documents the commitment of the Colorado General Assembly when fluctuations occur (Page e24-e25).

The proposed project defines "capital construction" on Page e25 which indicates that charter school will have flexibility in using grant funds for various authorized purposes. It also describes the management and oversight that will ensure funds are used in ways that are compliant with the grant and federal regulations (Page e24-e25).

The proposal describes strong methods of communication with charter school management as well as stakeholders that will be used to ensure all charter schools are notified about the program (Page e26-e27). The application describes the application process as well as some possible complexities that will require attention prior to funding dissemination.

The proposal outlines outcomes and targets (Page e31-e32) expected for successful implementation. Grant funds will be used to provide staff members that will have oversight of these outcomes and targets which is appropriate and reasonable as described. Although not slated in the proposal narrative to receive payments from grant funding, the stakeholder accountability committee will also provide valuable feedback for the project (Page e33).

The proposal outlines an evaluation process with achievable targets to measure implementation and to ensure the goals of the program are achieved. Grant staff will oversee the goals and targets and will provide transparent reporting through a public dashboard. In addition to grant staff, periodic meetings with the Colorado Department of Education (CDE) Core Team and The Advisory Accountability Committee will ensure successful implementation (Page e32-e33).

The proposal describes an extensive plan that will utilize administrative funds for technical assistance which includes a Charter School Facility Finance Certification Program (Page e35). The training will be comprehensive and will meet the need described as charter school leaders lacking capacity for facility, finance, and capital planning. The proposed budget projects funding schools serving 60% of the charter population in the first year of the grant program and increasing participation by 5% annually each year thereafter (Page e49). The personnel supported by grant funds are reasonable and justified to fully implement the proposed plan (Page e40-e41) based on the percentage of schools to be served. Two

positions will administer the sub-grant activities and a one-half full-time employee (FTE) position will support training and certification (Page e48).

**Weaknesses:**

The proposal is lacking adequate details for eligibility and targeting charter schools with the greatest need and highest proportions of students in poverty.

The proposal mentions eligibility several times but does not define the requirements a charter school will need to meet to receive funding. Specifically on Page e31, the proposal states "In administering the grant, the project team intends to administer the funds using the same per-pupil formula as the Charter Capital Assistance Program (CCAP) (i.e. the number of pupils will be the # of pupils in eligible schools and if the eligible school is operating in a district facility, their award will be calculated at 0.5 FTE for each student). Because the Federal funds will be managed separately from the state funds, and because fewer schools will be eligible for the Federal funds (some will inevitably fall off due to eligibility concerns), program staff will calculate the per pupil amount for the SFIG annually and only after determining which schools are eligible for funding. This will also maximize the amount of funding available to schools demonstrating the highest need." (Page e31). This provides good detail but would be more insightful with a definition and plan for determining "eligibility" included.

The proposal describes the funding allocation difference for charter schools housed in district facilities and private facilities. Other than this difference, the application states "per pupil facility funding is not differentiated in any other marked way" (Page e32) which does not appear to support charter schools with the greatest need, or highest levels of poverty as required by the grant funding.

**Reader's Score:**      **36**

**Selection Criteria - The Grant Project Team**

**1. (c) The Grant Project Team (10 points).**

**(1) The qualifications, including relevant training and experience, of the project manager and other members of the grant project team, including employees not paid with grant funds, consultants, and subcontractors.**

**(2) The adequacy and appropriateness of the applicant's staffing plan for the grant project.**

**Strengths:**

The grant project team is well qualified with relevant training and experience. A strong core team is described that will ensure all charter programs will complement each other while also ensuring proper management. The oversight structure, as detailed in the application, includes operational, organization, and community leadership (Page e37-e46). The staffing plan is comprehensive and appropriate for the grant project.

**Weaknesses:**

None noted.

**Reader's Score:**      **10**

**Selection Criteria - The Budget**

**1. (d) The Budget (10 points).**

**(1) The extent to which the requested grant amount and the project costs are reasonable in relation to the objectives, design, and potential significance of the proposed grant project.**

**(2) The extent to which the costs are reasonable in relation to the number of students served and to the anticipated results and benefits.**

**(3) The extent to which the non-Federal share exceeds the minimum percentages (which are based on the percentages under section 4304(k)(2)(C) of the ESEA), particularly in the initial years of the program.**

**Strengths:**

The budget is reasonable in relation to the overall project proposal with [REDACTED] of funds dedicated to supporting 60% of charter schools in the state in the first year and an additional 5% each year (Page e49). The budget provides for staffing to oversee the dissemination of funds and project details as well as a part time employee to oversee the training and certification as outlined.

The amount of funding approved by the Colorado General Assembly ([REDACTED]) exceeds the minimum percentages required for matching each year (Page e49).

**Weaknesses:**

The budget narrative includes [REDACTED] for contractual supports for the Colorado Charter School Institute but the application and budget narratives do not describe services. (Page e452)

**Reader's Score: 9**

**Selection Criteria - State Experience**

**1. (e) State Experience (10 points).**

**(1) The experience of the State in addressing the facility needs of charter schools through various means, including providing per-pupil aid and access to State loan or bonding pools.**

**Strengths:**

The proposal describes the various supports that have been implemented over the past 23 years to support the growing number of charter schools (Page e49). The Charter School Capital Construction Fund, established in 2001, provides financial assistance to charter schools for facility construction and renovation (Page e19). The per-pupil Charter School Capital Assistance Program provides new or single-site charter schools assistance with facility expenses (Page e21). The Colorado General Assembly has provided support to the State in supporting charter schools with the increased per-pupil revenue, the passage of a bill requiring school districts to share mill levy override revenue, the passage of a bill to equalize funding for state-authored charter schools, and the encouragement of collaboration between charter schools and districts in bond elections (Page e17)

**Weaknesses:**

None noted.

**Reader's Score: 10**

## Priority Questions

### Competitive Preference Priority - Competitive Preference Priority

#### 1. (1) Competitive Preference Priority:

Applicants that have not previously received a grant under the program.

#### Strengths:

Colorado has not previously received a grant under the Charter Schools Program (CSP) SFIG program.

#### Weaknesses:

None noted.

**Reader's Score:**      **10**

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**Status:**              Submitted

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