

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

Status: Submitted

Last Updated: 06/12/2018 04:06 PM

## Technical Review Coversheet

Applicant: Bluum, Inc. (U282A180005)

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

	Points Possible	Points Scored
<b>Questions</b>		
<b>Selection Criteria</b>		
<b>Quality of Project Design</b>		
1. Project Design	15	13
<b>Objectives</b>		
1. Objectives	20	17
<b>Quality of Eligible Subgrant Applicants</b>		
1. Subgrant Applicants	15	14
<b>State Plan</b>		
1. State Plan	20	17
<b>Quality of the Management Plan</b>		
1. Management Plan	15	12
<b>Parent and Community Involvement</b>		
1. Involvement	10	8
<b>Flexibility</b>		
1. Flexibility	5	2
<b>Sub Total</b>	100	83
<b>Priority Questions</b>		
<b>Competitive Preference Priority 2</b>		
<b>Equitable Financing</b>		
1. Equitable Financing	6	2
<b>Sub Total</b>	6	2
<b>Competitive Preference Priority 3</b>		
<b>Charter School Facilities</b>		
1. Charter School Facilities	6	3
<b>Sub Total</b>	6	3
<b>Competitive Preference Priority 4</b>		
<b>Best Practices to Improve Struggling School/LEAs</b>		
1. Struggling Schools	3	1
<b>Sub Total</b>	3	1
<b>Competitive Preference Priority 5</b>		
<b>Serving At-Risk Students</b>		

1. At-Risk Students	3	2
<b>Sub Total</b>	<b>3</b>	<b>2</b>
<b>Competitive Preference Priority 6</b>		
<b>Best Practices for Charter School Authorizing</b>		
1. Best Practices	5	4
<b>Sub Total</b>	<b>5</b>	<b>4</b>
<b>Total</b>	<b>123</b>	<b>95</b>

# Technical Review Form

Panel #2 - Panel 2 - Idaho - 1: 84.282A

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

Applicant: Bluum, Inc. (U282A180005)

## Questions

### Selection Criteria - Quality of Project Design

1. The Secretary considers the quality of the design of the proposed project. In determining the quality of the design of the proposed project, the Secretary considers:

Reader's Score: 13

#### Sub Question

1. (1) The extent to which the proposed project demonstrates a rationale

#### Strengths:

In Idaho, the charter sector has grown steadily (p. e38) but the demand for charter seats currently outstrips supply with 6,000 students on waitlists (p. e20). Given the fact that the rate of charter growth is not keeping pace with demand (p. 38) and the favorable performance of charters in serving all student populations as noted on p. e20, the rationale for this project is sound since a substantial boost in the growth rate is needed to open up quality seats to families. This is especially true given Idaho's substantial population growth in general (p. e37). The logic model provided on p. e70 aligns well with this demonstrated need, especially as it relates to increasing the number of quality charter seats by 8,200 via new starts, replication, and expansion efforts as outlined.

#### Weaknesses:

No weaknesses noted.

Reader's Score: 10

2. (2) The extent to which the goals, objectives, and outcomes to be achieved by the proposed project are clearly specified and measurable.

#### Strengths:

Objective #1 and Objective #2 on p. e40 are clearly stated with aligned goals that are readily measurable and directly relevant to the overall project rationale (pp. e37-e40). For example, Objective #2 aims to expand the Idaho Public Charter School Commission's (PCSC) standing as a quality authorizer and is directly tied with a goal that determines whether this was accomplished, as shown by this measure: "Increased % of charter schools in authorizers' portfolios identified as quality and or improving..." (p. e40).

#### Weaknesses:

Objective #3, on p. e40, is to "Evaluate and disseminate widely successes and lessons to impact larger education system" is tied to increased academic outcomes for both charter students and all Idaho students as measured by achievement growth targets set by the state's ESSA plan (p. e63). Although these targets are measurable, the link

### Sub Question

between disseminating best practices and overall test score gains is subject to myriad factors that won't be accounted for. Therefore, there's no way to establish a direct relationship between the actions outlined by Objective #3 and the goals set forth.

**Reader's Score: 3**

### Selection Criteria - Objectives

#### 1. The ambitiousness of the State entity's objectives for the quality charter school program carried out under this program.

**Note: In response to this criterion, an applicant may address (or cross reference) some or all of the components of application requirements (I)(A)-(G) in this notice, which require the applicant to provide a description of the State entity's objectives in running a quality charter school program and how the objectives of the program will be carried out.**

#### Strengths:

Objective #1 is the primary focus of the grant (p. e41) and its ambitiousness can be evaluated by comparing its goal--to increase the number of high-quality seats by 8,200 students (p. e41)--to the growth in Idaho's charter sector between 2013 and 2018, a time period in which enrollment grew by 3,090 (p. e38). Assuming this rate of growth would continue in the absence of additional external support, the grant would help Idaho add about 5,110 seats in the next five years--or nearly one-quarter of Idaho's current charter enrollment (p. e38). This appears to be both ambitious and feasible, especially given a focus on recruiting and developing school leaders, which generally serves as bottleneck for expanding high-quality seats.

Activity (b) 1.2 on p. e41 addresses the talent pipeline for charters through Blooms' Idaho New Schools Fellowship. Given that the applicant seeks to increase the number of charter seats in Idaho by over 8,000 students, recruiting and developing effective leaders and teachers will be a critical component and this strategy aligns well with Objective #1. This is especially true as research has indicated that teachers and principals are significant factors in determining student outcomes.

Activity (b) 3.1 on p. e46 seeks to evaluate the impact of charter schools on student achievement, families, and communities. This aligns well with Objective #3 (p. e46) and the applicant provides a clear plan to execute it, including contracting with an outside analyst to publish a report. The use of a third party vendor is notable as this will help ensure a greater degree of data integrity.

#### Weaknesses:

Smart Goal Statement 1.2 on p. e40 states that "Sub grantee charter school demographics as a whole will be not less than 5% of state averages for non-white, ELL, special needs, and economically disadvantaged students." Given the fact that a primary purpose of the Expanding Opportunity Through Quality Charter Schools Program (CSP)-Grants to State Entities program is to "expand opportunities for all students, particularly traditionally underserved students, to attend public charter schools," this does not appear to be a particularly ambitious target and supporting evidence to show why this, in fact, would be considered ambitious is not presented.

**Reader's Score: 17**

### Selection Criteria - Quality of Eligible Subgrant Applicants

#### 1. The likelihood that the eligible applicants receiving subgrants under the program will meet those objectives and improve educational results for students.

**Strengths:**

According to data provided on p. e59, virtually all of the sub-grantee awards will be centered on achieving Objective #1: increasing the number of quality charter school seats by 8,200 students (p. e40). A thorough plan is outlined that should maximize the likelihood of allocating awards in a manner that will achieve this target. This includes a comprehensive communication strategy (pp. e51-e52), grant reviewers with varied experiences within education (pp. e52-e53), and a comprehensive rubric that includes talent and facilities as key factors (pp. e49-e51). Importantly, the consortium partners (Bluum Inc., Idaho Public Charter School Commission, Idaho State Board, Albertson Family Foundation, and Building Hope) have complementary expertise and their local knowledge with Idaho's charter sector is also a key asset.

**Weaknesses:**

On p. e22 the application states that it will support "novel innovations" with a particular focus on rural charters, which is reinforced by the first of three objectives listed on p. e17 ("Increase the number of quality charter school seats by 8,200 students, especially for our most educationally disadvantaged and rural students, through start-up, replication and expansion"). Although the application on pp. e528-e532 considers a potential subgrantee's "Priority Area" (p. e529), which includes rural populations, neither this nor innovation appear to be substantially emphasized.

**Reader's Score: 14**

**Selection Criteria - State Plan****1. The State entity's plan to--**

- 1) Adequately monitor the eligible applicants receiving subgrants under the State entity's program;**
- 2) Work with the authorized public chartering agencies involved to avoid duplication of work for the charter schools and authorized public chartering agencies; and**
- 3) Provide technical assistance and support for--**
  - i. The eligible applicants receiving subgrants under the State entity's program; and**
  - ii. Quality authorizing efforts in the State.**

**Strengths:**

The performance contract outlined (p. e62) along with the seven key indicators (pp. e63-e64) ensure that clear expectations are set so that sub-grantees can be held accountable to the agreed upon performance targets. A framework is presented on p. e63 that clearly identifies metrics for Indicator 1 and Indicator 2 and monitoring activities will include onsite visits within the first twelve months of school operation and an annual progress report prior to each subsequent fiscal year as noted on p. e64, which the applicant will review. Importantly, the contracts are aligned with authorizers' respective performance certificates as noted on p. e62 and largely rely on readily available reports, thus avoiding potential conflicts and duplication of work. Authorizers in Idaho are required by law to create performance certificates that set forth the academic and operational performance expectations by which charters are evaluated (p. e32). The indicators to be included in each subgrantee contract are as follows:

- 1) Are students meeting or exceeding state academic achievement targets?
- 2) Are students meeting or exceeding academic growth targets?
- 3) Is the school meeting or exceeding enrollment targets?
- 4) Is the school's audit clean and are there no defaults on debt agreements?
- 5) Have there been changes to school leadership/board governance? If so, are replacements high quality, or is there a need to assist in finding appropriate talent?
- 6) Is the school in good standing with the authorizer?
- 7) Is the school in compliance with Idaho's Student Satisfaction and Engagement Survey?

The application outlines technical assistance for potential charter operators, including Charter School Training and New Charter Petitioner Guidance (p. e66). These efforts are valuable in attracting and supporting a more robust and diverse

pool of applicants through the authorization process, thus increasing the likelihood of approving both quality operators and charters with unique approaches to education that can serve students with diverse needs. The application also outlines technical assistance for quality authorizing efforts, including coordinating the publication of an updated Authorizer Evaluation Report (p. e69), which will serve as a benchmark for improving authorization practices.

**Weaknesses:**

Sub-grantees will be responsible for overseeing substantial increases in enrollment that will fundamentally change their financial outlook and, as such, particular attention should be paid to financial health during expansion to account for sustainability. Although Indicator #4 (p. e64) evaluates a school's audit performance and whether it has defaulted on debt agreements, it says little about whether it is expanding in a financially sustainable manner that other measures of liquidity or debt obligations might illuminate. Such measures would help bolster Indicator #4 and the performance contract in general, especially since financial distress is often the source of failed charters. Similarly, factors of demand that indicate quality--including waitlist data and student retention rates--could also be included, as these capture components of parent satisfaction that test data miss.

**Reader's Score:** 17

**Selection Criteria - Quality of the Management Plan**

- 1. The Secretary considers the quality of the management plan for the proposed project. In determining the quality of the management plan for the proposed project, the Secretary considers:**

**Reader's Score:** 12

**Sub Question**

- 1. (1) The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks**

**Strengths:**

The management plan (pp. e70-e73) effectively accounts for the variables that are likely to result in achieving the stated objectives both on time and within budget. It is clear who is responsible for each objective and the resources, activities, and outputs that will support these efforts are laid out. For example, Bluum, PCSC, and the State Board are responsible for Objective #1 and the activities that will help them meet this target are defined in detail along with associated outputs (p. e71).

Additionally, the year-by-year summary of grants defined on p. e59 establishes exactly when funds will be delivered over the course of the project and the Tentative Timeline for RFP (p. e54) exemplifies a sufficient level of detail. As a result, this forms the basis of an effective management plan that will aid in its implementation.

**Weaknesses:**

Although the consortium noted on p. e12 (Bluum Inc., Idaho Public Charter School Commission, Idaho State Board, Albertson Family Foundation, and Building Hope) provides the application with a strong foundation of expertise and local knowledge, it also increases the overall complexity of the project thus making it more vulnerable to inefficiencies such as miscommunication and a lack of accountability. The application does not address how it will pro-actively address these potential pitfalls among consortium partners, which weakens the management plan.

**Sub Question**

**Reader's Score: 8**

**2. (2) The extent to which the time commitments of the project director and principal investigator and other key project personnel are appropriate and adequate to meet the objectives of the proposed project**

**Strengths:**

The project personnel plan seems adequate to meet the objectives provided. A particular strength is that Bluum's CEO, Terry Ryan, will serve as project director and dedicate 40% of his time to overseeing its implementation (p. e74). Mr. Ryan's experience (appendix) in engaging with high-level stakeholders will certainly be needed, especially given the number of partners involved and the overall complexity of the project.

**Weaknesses:**

The management plan outlined on pp. e69-e75 does not explicitly address how the time of key project personnel will be dedicated to the specific activities listed. Although general descriptions of their responsibilities are provided (e.g. The Director of Federal Grants and Supports will oversee the daily operations of the CSP grant, p. e74) this lack specificity makes it difficult to fully gauge whether the resources allocated are appropriate.

**Reader's Score: 4**

**Selection Criteria - Parent and Community Involvement**

**1. The State entity's plan to solicit and consider input from parents and other members of the community on the implementation and operation of charter schools in the State.**

**Strengths:**

A plan is in place to gather, analyze, and share parent and community feedback (pp. e76-e78). The use of both qualitative and quantitative methods (p. e76) is particularly valuable, as this approach allows for more comprehensive and nuanced data to be gathered. Contracting with a vendor to conduct this work is another strength (p. e76), since this will help ensure the most effective surveying techniques are employed and help maintain data integrity.

**Weaknesses:**

No strategy is in place to maximize the response rates for the parent questionnaires noted on p. e77. Although multiple delivery methods will be employed, including online and paper copies, there is no plan to measure, track, and even incentivize high response rates. This could result in substantial variation in response rates, potentially affecting the quality of the data collected.

**Reader's Score: 8**

**Selection Criteria - Flexibility**

**1. The degree of flexibility afforded by the State's charter school law and how the State entity will work to maximize the flexibility provided to charter schools under such law.**

**Strengths:**

The application notes that Idaho recently streamlined the procedures for opening new charter schools via House Bill 279 (p. e78), resulting in a more simplified and compressed process. This is laudable since states and authorizers should work toward eliminating needless barriers-to-entry that might prevent or delay effective operators from serving students.



**Weaknesses:**

The proposal fails to note whether Idaho affords charters flexibilities that are most vital to local autonomy, including whether they are subject to class size and teacher certification requirements. Providing charter leaders with autonomy over such things ensures that they can allocate resources in locally-responsive ways.

Additionally, Idaho's school finance formula delivers funding based on a resource-allocation model that includes 41 programmatic allotments that must be used for specific purposes (p. e23). Such formulas are laden with red-tape and top-down mandates that dictate how to spend education dollars, which decreases flexibility for all of Idaho's schools including charters. A better system would allocate dollars based on students and allow local leaders determine how to funds are spent.

**Reader's Score: 2**

**Priority Questions**

**Competitive Preference Priority 2 - Equitable Financing**

**1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located ensures equitable financing, as compared to traditional public schools, for charter schools and students in a prompt manner.**

**Strengths:**

Idaho delivers funding to charters in a prompt manner. Charters are funded on the same quarterly payment schedule as all public schools and advance payments are made in a charter's first year of operation and sometimes longer, depending upon growth trends. (p. e23) This helps ensure their cash flows are structured in a manner that matches payment and expenses, which aids liquidity.

Idaho officials are studying a switch to student-based budgeting (p. e25). This funding model promotes equity by matching funding allotments with student need, such that additional dollars are provided to disadvantaged students (p. e25). Studying this model is a positive step toward implementing a more equitable school finance system that is focused on student-level equity and would benefit all charters, and especially those greater proportions of disadvantaged students.

**Weaknesses:**

Idaho's resource-based allocation model described on p. e23 is a substantial weakness. This method of delivering funding is inherently inequitable as it allocates dollars in a way that isn't responsive to changes in student populations. This means that dollars don't readily follow students to schools of choice and some districts arbitrarily receive more resources than others, thus diminishing student-level equity.

Idaho charters don't have access to local revenues, resulting in a \$1,500 per pupil funding gap compared to traditional districts (p. e24). Even though charters don't have taxing authority, it is possible to bridge this gap by providing additional funding based on state-wide averages that help compensate for the local enrichment dollars that districts generate.

**Reader's Score: 2**

**Competitive Preference Priority 3 - Charter School Facilities**

**1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located provides charter schools one or more of the following:**

**a) Funding for facilities;**

- b) Assistance with facilities acquisition;
- c) Access to public facilities;
- d) The ability to share in bonds or mill levies;
- e) The right of first refusal to purchase public school buildings; or
- f) Low- or no-cost leasing privileges.

**Strengths:**

Idaho provides three separate per-pupil allotments for facilities: a share of district bonds and levies, funding through the School Facilities Maintenance Match program, and state lottery dollars to offset facilities costs (pp. e25-e26). This helps ensure that fewer operational dollars are spent on overhead and long-term debt obligations, which frees up more dollars to be used on factors that have the greatest effects on student achievement such as recruiting and retaining high quality teachers. Additionally, providing per-pupil dollars in this manner is especially beneficial as it gives charters flexibility in determining how dollars are spent on facilities.

Idaho also provides assistance with facilities acquisition. Eligible charters can obtain favorable financing terms via the state's Public Charter School Debt Reserve, which helps them maintain better levels of liquidity and/or spend less over the life of the loan (p. e26). This program is a strength since it promotes financial health (i.e. lower risk of financial distress) while saving valuable dollars that can be allocated elsewhere.

**Weaknesses:**

The application did not fully address whether current facilities support for charters is sufficient, and based on the information provided, it appears the funding level provided is minimal. For example, charters only receive between 20% and 50% of the average per-pupil funding from district bonds and levies, falling well short of what their district counterparts generate (p. e25). Similarly, the School Facilities Maintenance Match program and lottery dollars are also minimal 2016-17 presented on p. e25. This means that scarce operational dollars must still be diverted to facilities expenditures and likely contributes to the more than 6,000 wait-listed students mentioned on p. e20.

**Reader's Score:** 3

**Competitive Preference Priority 4 - Best Practices to Improve Struggling School/LEAs**

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located uses best practices from charter schools to help improve struggling schools and local educational agencies.

**Strengths:**

Idaho's Local Innovation School Act gives participating schools and districts charter-like autonomy (p. e27). The law can be used to free newly-formed schools of burdensome requirements that restrict productivity, such as teacher contracts (p. e27). This is beneficial as it will allow more students to be enrolled in schools where local leaders have greater flexibility to respond to the needs of individual students and staff, which can ultimately help boost outcomes.

**Weaknesses:**

The application provides insufficient evidence that the state uses best practices from charters to improve struggling schools and one concern in particular is that the Local Innovation School Act does not address Local Education Agencies and might fail to achieve substantial scale given the fact that it is capped at ten schools annually (p. e243). This means that all struggling schools might not be able to benefit from the additional autonomy provided by the law and districts themselves might still be constrained.

Reader's Score: 1

### Competitive Preference Priority 5 - Serving At-Risk Students

1. To receive points under this priority, an applicant must demonstrate the extent to which it supports charter schools that serve at-risk students through activities such as dropout prevention, dropout recovery, or comprehensive career counseling services.

#### Strengths:

A vital component of serving at-risk students is cultivating effective charter leaders, which Bluum has demonstrated through its Idaho New School Fellowship (p. e30) and its support of the forthcoming launch of Elevate Academy that will serve this demographic (p. e31). This work helps to address the talent pipeline issues that can prevent quality charters from serving more students generally and at-risk students in particular.

#### Weaknesses:

It is unclear whether Bluum's work in supporting charter schools that serve at-risk students goes beyond the Idaho New School Fellowship that they direct (p. e30). Although the work of other organizations throughout Idaho was detailed in the application (pp. e29-e31), the applicant does not fully address how it directly supports this work.

Reader's Score: 2

### Competitive Preference Priority 6 - Best Practices for Charter School Authorizing

1. To receive points under this priority, an applicant must demonstrate the extent to which it has taken steps to ensure that all authorized public chartering agencies implement best practices for charter school authorizing.

#### Strengths:

The structures described (pp. e31-e37) promote best practices for Idaho's authorizers. In particular, the frameworks described that include academic, operational, and financial measures set clear expectations (p. e32) and contain reporting mechanisms that promote transparency (p. e34). Under Idaho law, all charters are also subject to mandatory annual audits (p. e36). These structures ensure that charter leaders know what's expected of them, provide authorizers with the tools necessary to make informed decisions, and help to promote financial health.

With the passage of House Bill 279 in 2017, Idaho has streamlined the process for obtaining a charter (p.e78). This will help ensure that applicants don't waste scarce resources on requirements that have little relation to their suitability to serve students, thereby minimizing unnecessary barriers-to-entry.

#### Weaknesses:

The application describes PCSC's authorization activities at length but not does provide sufficient detail about Idaho's other authorizers, including districts, colleges and universities (p. e31). The policies and processes for these authorizers are unclear as is the extent to which they are involved in authorizing activities in comparison to PCSC.

Reader's Score: 4

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## Technical Review Coversheet

Applicant: Bluum, Inc. (U282A180005)

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

	Points Possible	Points Scored
<b>Questions</b>		
<b>Selection Criteria</b>		
<b>Quality of Project Design</b>		
1. Project Design	15	13
<b>Objectives</b>		
1. Objectives	20	17
<b>Quality of Eligible Subgrant Applicants</b>		
1. Subgrant Applicants	15	14
<b>State Plan</b>		
1. State Plan	20	16
<b>Quality of the Management Plan</b>		
1. Management Plan	15	12
<b>Parent and Community Involvement</b>		
1. Involvement	10	8
<b>Flexibility</b>		
1. Flexibility	5	3
<b>Sub Total</b>	100	83
<b>Priority Questions</b>		
<b>Competitive Preference Priority 2</b>		
<b>Equitable Financing</b>		
1. Equitable Financing	6	3
<b>Sub Total</b>	6	3
<b>Competitive Preference Priority 3</b>		
<b>Charter School Facilities</b>		
1. Charter School Facilities	6	2
<b>Sub Total</b>	6	2
<b>Competitive Preference Priority 4</b>		
<b>Best Practices to Improve Struggling School/LEAs</b>		
1. Struggling Schools	3	2
<b>Sub Total</b>	3	2
<b>Competitive Preference Priority 5</b>		
<b>Serving At-Risk Students</b>		

1. At-Risk Students	3	2
<b>Sub Total</b>	<b>3</b>	<b>2</b>
<b>Competitive Preference Priority 6</b>		
<b>Best Practices for Charter School Authorizing</b>		
1. Best Practices	5	3
<b>Sub Total</b>	<b>5</b>	<b>3</b>
<b>Total</b>	<b>123</b>	<b>95</b>

# Technical Review Form

Panel #2 - Panel 2 - Idaho - 1: 84.282A

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

Applicant: Bluum, Inc. (U282A180005)

## Questions

### Selection Criteria - Quality of Project Design

1. The Secretary considers the quality of the design of the proposed project. In determining the quality of the design of the proposed project, the Secretary considers:

Reader's Score: 13

#### Sub Question

1. (1) The extent to which the proposed project demonstrates a rationale

#### Strengths:

The rationale stating the need for more seats, the success and capability of charters and the demand for charters is sound with evidence provided to back up the stated rationale. The applicant notes that Idaho's population grew faster than any other state from July 2016-17 to support the rationale. The schools are overcrowded and expect to see a 17% increase in pre-K by 2025. Idaho charters consistently outperform the district schools in state tests and the SAT. There is a great demand for more charter schools, especially in rural areas, there are 6000 students on the charter school waitlists. (e37-38).

The applicant provided research and evaluation as evidence to demonstrate their sound rationale. Charter school students outperform their students in ELA and math on statewide assessments (e38) as well as SAT scores (e39). A survey entitled The People's Perspective showed that 62% of Idaho parents would opt for private or charter schools (e351) and that most parents feel that charter schools are better than regular public schools (e356).

In addition, the applicant provided a logic model (p.e70 ) which included comprehensive short, mid, and long term quantitative objectives surrounding the growth of high-quality charter schools through new schools, replications and expansions, expanding authorizer quality and developing an impactful dissemination program.

#### Weaknesses:

No weaknesses noted.

Reader's Score: 10

2. (2) The extent to which the goals, objectives, and outcomes to be achieved by the proposed project are clearly specified and measurable.

## Sub Question

### Strengths:

Based on the information provided in the logic model (p. e40), the projected goals, objectives and outcomes are clear and measurable.

For example, the applicant proposes to increase charter school seats by 8200 students in 5 years with a focus on educationally disadvantaged students. This objective can be measured against a baseline of the applicant's current total number of charter school students and educationally disadvantaged students.(e40)

Another objective of the state that is clear and measurable is their proposal to maintain and disseminate its strong authorizing practices which can be measured by tracking the number of charter schools authorized by an authorizers deemed high-quality by the outcomes relative to the baseline set in their authorizer evaluation report. The criteria and baseline will be generated by an outside expert such as NACSA (e40, e70).

### Weaknesses:

It would not be possible to attribute student academic outcomes directly to dissemination efforts in the manner outlined in the application. The application lacks the detail necessary to demonstrate how disseminating best practices can be isolated in order to be considered the sole factor in increasing student academic outcomes. (e40)

**Reader's Score:** 3

## Selection Criteria - Objectives

### 1. The ambitiousness of the State entity's objectives for the quality charter school program carried out under this program.

**Note: In response to this criterion, an applicant may address (or cross reference) some or all of the components of application requirements (I)(A)-(G) in this notice, which require the applicant to provide a description of the State entity's objectives in running a quality charter school program and how the objectives of the program will be carried out.**

#### Strengths:

The projected goals, objectives and outcomes (e40) are robust, clear and aligned throughout the application. Bluum proposed to increase the charter school seats by 8200 students in 5 years with a focus on educationally disadvantaged students, maintain and disseminate its strong authorizing practices, and evaluate and disseminate successful practices to increase student academic outcomes throughout the state. The objective to increase the charter school seats is the applicant's primary goal and it is ambitious as they only increased by 3000 in the past 5 years.(e41)

Many of the activities listed will serve to achieve these objectives and outcomes such as developing high quality charter school pipelines that will open high-quality charter schools, providing technical assistance to applicants to ensure strong applications, and engaging parents and communities through collaboration to ensure there is consistent charter school awareness and buy-in. (e41-e47)

#### Weaknesses:

It is not clear how the applicant intends to improve the non-PCSC authorizers, though it is part of their objectives. The goal to be within 5% of the local districts demographics is not a very strong goal as charters should aim to have greater diversity in their schools and should at least match the districts that they serve. (e40-41)



Reader's Score: 17

### Selection Criteria - Quality of Eligible Subgrant Applicants

**1. The likelihood that the eligible applicants receiving subgrants under the program will meet those objectives and improve educational results for students.**

**Strengths:**

Idaho provided a robust RFP where the applicants will be required to be high quality (definition on e27) and provide evidence on 7 main tenets that evidence has shown will ensure a high-quality charter school (e49-50). These tenets were derived from lessons learned over 20 years of experience and include a committed board of trustees, a well-conceived facility plan and evidence of an innovative and effective learning model. They must, amongst other things, sign assurances that all activities will be carried out, have a clear plan for communicating with staff, parents and the community, have a clear transportation plan and contain a sound budget demonstrating sustainability beyond the grant (e53-53)

Idaho provides a thorough plan to announce and provide TA for the grant application (e-51)

Idaho provides a peer review process that ensures alignment with the school's charter application and CSP grant application (e52-53).

Once chartered there is a rigorous opening procedure process that must be adhered to by the school and authorizer. (e38)

**Weaknesses:**

More information is needed on how to ensure a transparent or effective review process, for example, explanation as to why two people on the peer review team would guarantee a strong peer review team or process (e52).

It is unclear how the RFP scoring will be weighted to ensure priority for educationally disadvantaged students. (e529)

Reader's Score: 14

### Selection Criteria - State Plan

**1. The State entity's plan to--**

- 1) Adequately monitor the eligible applicants receiving subgrants under the State entity's program;**
- 2) Work with the authorized public chartering agencies involved to avoid duplication of work for the charter schools and authorized public chartering agencies; and**
- 3) Provide technical assistance and support for--**
  - i. The eligible applicants receiving subgrants under the State entity's program; and**
  - ii. Quality authorizing efforts in the State.**

**Strengths:**

Bluum listed several strong practices planned to ensure adequate monitoring of the CSP sub-grantees. The schools will be monitored in several ways: all charter schools are required to utilize Idaho's state accountability system to ensure academic and operational success; the authorizers, led by PCSC, have incorporated it into the charter school performance certificates. Bluum will also maintain a separate performance contract with the CSP subgrantees that will set

performance benchmarks based on 7 indicators for the 2-year grant term (e64)

Also, on-site technical assistance and monitoring visits will take place within the first 12 months of the grant and an annual report will be required from subgrantees to measure progress with the 7 indicators. (e64)

The applicant reported that avoiding duplication of work is already a strong process in Idaho for all schools, including charters. Bluum will work closely with the PCSC, other authorizers and state agencies to streamline reporting requirements. An example was provided that if a school's progress is fully evaluated by their authorizer, Bluum will use this report instead of requiring a separate report from the charter school. (e65)

Bluum will also use the charter application rubric in the CSP subgrant application to be more efficient instead of duplicating the due diligence of the authorizer's work. (e66)

The applicant outlined the many ways it provides technical assistance for applicants and subgrantees including: New Charter Petitioner Guidance, Pre-Opening Guidance, and New School Leader Orientation. This TA is provided to ensure the schools have the resources needed to open strongly and to remain high quality. There will also be specific CSP training for subgrantees.

Bluum will use 3% of their budget toward development of portfolio and performance software which will automate and streamline compliance requirements. This software will be offered to all authorizers and will help expand the state's overall capacity to provide high-quality authorizing (e68)

Bluum shows a commitment to further improvement by planning on partnering with PCSC and the State Board to coordinate with NACSA on a 2019 Idaho Authorizer Evaluation Report to identify improvements needed for all authorizers (e69).

**Weaknesses:**

It is not clear exactly what consequences are available if subgrantees do not meet their benchmarks. It is also unclear how the CSP grant is specifically audited/monitored from a fiscal standpoint (e64).

The applicant states that the planned evaluations may make some authorizers turn their schools over to PCSC, which may sound positive, but there is no mention of plans to help improve their current practices. There are several other authorizers and there were not clear plans to offer them assistance or support (e68-69). Some workshops are mentioned in the logic model, but it is unclear what they will entail(e70).

**Reader's Score: 16**

**Selection Criteria - Quality of the Management Plan**

- 1. The Secretary considers the quality of the management plan for the proposed project. In determining the quality of the management plan for the proposed project, the Secretary considers:**

**Reader's Score: 12**

**Sub Question**

## Sub Question

### 1. (1) The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks

#### Strengths:

Bluum submitted a strong, thorough, and detailed Management Plan that aligned with the plans and outcomes proposed throughout the application. The management plan included a detailed outline including who is responsible for which activities and outcomes for opening new high-quality charter schools, as well as the expansion and replication of existing high-quality schools (by 2022-8 new, 4 expansions, 5 replications)(e70). A commitment to the dissemination of best practices is outlined as well as activities to analyze data and identify best practices to achieve the overarching goal of increasing academic achievement (e70-73).

#### Weaknesses:

The application is not always consistent, Bluum's long term goal is to award 19 subgrants but even if every new charter/expansion/replication was awarded the CSP, that only adds up to 17. More specifics on timeline are needed to fully understand the applicant's implementation plan.

**Reader's Score: 8**

### 2. (2) The extent to which the time commitments of the project director and principal investigator and other key project personnel are appropriate and adequate to meet the objectives of the proposed project

#### Strengths:

The time commitment allocated to the CSP grant by Bluum is sufficient in overseeing and administering the CSP grant. Two of the executives are providing 40% FTE in-kind as well as 1.35 FTE directly dedicated to the CSP and TA to help the subgrantees apply for their federal funds as well (e74-75).

#### Weaknesses:

Though the 40% in-kind participation of the 2 executives is good, there is no explanation provided of exactly their duties and responsibilities (e74).

**Reader's Score: 4**

## Selection Criteria - Parent and Community Involvement

### 1. The State entity's plan to solicit and consider input from parents and other members of the community on the implementation and operation of charter schools in the State.

#### Strengths:

The applicant showed commitment to ensuring strong parent and community involvement by demonstrating that this work has already begun and will continue with or without the grant. Because charter schools are locally initiated in Idaho, the applicant believes that community support is critical to their success. The plan includes qualitative research such as focus groups, and quantitative research, such as surveys and engagement activities, to review the research results. Bluum also plans to have town-hall like discussions with stakeholders. The variety of activities proposed by the applicant to reach its objectives as well as those activities that are already occurring demonstrates their commitment to solicit and consider input from parents and the community. (e76-77)

#### Weaknesses:

There is no explanation provided on how the applicant plans to track, measure, and incentivize response rates for parents, though this is a key to success for this plan.

It is unclear how focus group data will be used.

Reader's Score: 8

### Selection Criteria - Flexibility

1. **The degree of flexibility afforded by the State's charter school law and how the State entity will work to maximize the flexibility provided to charter schools under such law.**

#### Strengths:

There are many strengths to the autonomies and flexibilities allowed charter schools contained in Idaho state law, such as charters being allowed to be their own LEAs and being fiscally and legally autonomous. Charter schools can purchase real estate; borrow money for many purposes and contract with a management company. In addition, the applicant notes that the charter school sector and the applicant are committed to passing bills that will allow additional flexibilities demonstrating that they will work to maximize the flexibility provided to charter schools to increase the opportunity for innovation. (e78)

#### Weaknesses:

Charter schools in Idaho do not have the autonomy to hire and fire as they please. It was also noted that other flexibilities are being sought after as well, providing evidence that there are several flexibilities still needed for the schools to be truly autonomous. (e79)

Another area where autonomy is weak is in regard to required programmatic allotments for much of their tuition funding (e23).

Reader's Score: 3

### Priority Questions

#### Competitive Preference Priority 2 - Equitable Financing

1. **To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located ensures equitable financing, as compared to traditional public schools, for charter schools and students in a prompt manner.**

#### Strengths:

The application cited several strong laws that allow charter schools equal access to funding that all districts and schools in Idaho receive; By law, charter schools have equal access to federal title dollars and charter schools receive the same transportation reimbursement that districts receive. (e24) (e67)

Another strength cited in the application is that alternative Charter Schools can apply for up to 25% more funding for summer school activities, which fulfills a need for the type of programs that serve many alternative populations (e24)

The financing formulas and methods are being reviewed for improvement and a recommendation is planned for the 2019 legislature to weight factors like student poverty and ELL to increase funding (e25)

#### Weaknesses:

Charter Schools do not receive equitable tuition because they cannot levy property taxes as public districts can resulting in charter schools, on average, receiving \$1500 less per pupil than district schools. (e24)

Reader's Score: 3

### Competitive Preference Priority 3 - Charter School Facilities

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located provides charter schools one or more of the following:
  - a) Funding for facilities;
  - b) Assistance with facilities acquisition;
  - c) Access to public facilities;
  - d) The ability to share in bonds or mill levies;
  - e) The right of first refusal to purchase public school buildings; or
  - f) Low- or no-cost leasing privileges.

#### Strengths:

Idaho law provides for a state per pupil facilities allowance, facilities maintenance match program, and state lottery funds providing guaranteed income stream for Idaho charter schools. There is also a Public Charter School Debt Reserve in Idaho that helps schools obtain favorable financing which helps them save cash or borrow less money resulting in the school being in a better financial position. (e25)

#### Weaknesses:

Though there are several sources of guaranteed facility income under Idaho law, the actual per pupil funding is still extremely low (\$468 in FY18) (e25). There was not enough evidence to support if this funding satisfies the facility needs of an Idaho charter school or how much schools have benefited from the other options.

Reader's Score: 2

### Competitive Preference Priority 4 - Best Practices to Improve Struggling School/LEAs

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located uses best practices from charter schools to help improve struggling schools and local educational agencies.

#### Strengths:

Several examples are provided of charter school best practices being used by local district schools, such as the Upper Carmen Charter School sharing best practices with the Salmon School District and the Harold B. Lee Elementary School adopting Alturas International Academy charter school's teaching and learning model (e29)

#### Weaknesses:

The Innovation school model does not provide evidence of how the state is ensuring that charter school's share best practices. The response implies that some of the Innovation Schools will use charters as their model and seek help from them, but there is no evidence that it is happening or that it is a specific tenet of the law (e28). There is also little evidence or data offered to satisfy this criterion that demonstrates the extent the state uses best practices from charter schools to improve struggling schools or districts.

Reader's Score: 2

### Competitive Preference Priority 5 - Serving At-Risk Students

1. To receive points under this priority, an applicant must demonstrate the extent to which it supports charter schools that serve at-risk students through activities such as dropout prevention, dropout recovery, or comprehensive career counseling services.

#### Strengths:

One of the strengths in this response is that Idaho demonstrates its commitment to serving at-risk students by having 5 alternative charter schools serving 1000 students. Additionally, state law provides for alternative schools to negotiate differentiated performance targets that still ensure quality and rigor. Examples of some promising alternative schools were provided: (e30)

- Pathways in Education (PIE) Nampa charter school opened in 2016 serving over 200 at risk students.
- Elevate Academy charter school will open in 2019 and will be a vocational school for grades 6-12

Another strength is the Idaho New School Fellowship dedicated to at-risk populations, this fellowship is managed by Bluum. The Fellowship provides advanced leadership training for school leaders who serve or will serve Idaho's neediest students so that they will have the expertise needed to launch a successful charter school. (e30-31)

#### Weaknesses:

The applicant did not adequately explain the relationships of the different partners involved and their roles in supporting alternative charter schools and their at-risk population. (e30-31)

Reader's Score: 2

### Competitive Preference Priority 6 - Best Practices for Charter School Authorizing

1. To receive points under this priority, an applicant must demonstrate the extent to which it has taken steps to ensure that all authorized public chartering agencies implement best practices for charter school authorizing.

#### Strengths:

Idaho's 2013 law, which includes performance-based contracts based on NACSA's recommended policies ensures strong authorizing practices as it clearly sets forth the rigorous academic and operational outcomes that are expected of each charter school(e32).

The Public Charter School Commission (PCSC) has adopted many strong practices such as providing annual student performance data and individual school performance reports (e34). All charters must undergo an annual independent financial audit (e36) and there are also strong revocation and closure laws outlined in the application (e36).

The majority of the charters (41 out of 56) are overseen by the PCSC(p e248) and their strong authorizing practices.

#### Weaknesses:

The executive summary states there are 50 charters (not 56) so it is not clear how many charters there are in Idaho and how many are authorized by PCSC. (e20). Another table states there are 52 schools (e38) and yet another table states there are 48 (e302). Page e42 states PCSC authorizes 37. On e248 it states that PCSC oversees 41 out of 36. These inconsistencies make it difficult to ascertain the number of charter schools that are overseen by PCSC and how many

are overseen by other authorizers.

The applicant does not adequately explain what it is doing to ensure other authorizers in the state adopt best practices.

**Reader's Score:** 3

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**Status:** Submitted

**Last Updated:** 06/12/2018 04:06 PM

Status: Submitted

Last Updated: 06/12/2018 04:06 PM

## Technical Review Coversheet

Applicant: Bluum, Inc. (U282A180005)

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

	Points Possible	Points Scored
<b>Questions</b>		
<b>Selection Criteria</b>		
<b>Quality of Project Design</b>		
1. Project Design	15	10
<b>Objectives</b>		
1. Objectives	20	17
<b>Quality of Eligible Subgrant Applicants</b>		
1. Subgrant Applicants	15	13
<b>State Plan</b>		
1. State Plan	20	17
<b>Quality of the Management Plan</b>		
1. Management Plan	15	13
<b>Parent and Community Involvement</b>		
1. Involvement	10	9
<b>Flexibility</b>		
1. Flexibility	5	3
<b>Sub Total</b>	100	82
<b>Priority Questions</b>		
<b>Competitive Preference Priority 2</b>		
<b>Equitable Financing</b>		
1. Equitable Financing	6	2
<b>Sub Total</b>	6	2
<b>Competitive Preference Priority 3</b>		
<b>Charter School Facilities</b>		
1. Charter School Facilities	6	3
<b>Sub Total</b>	6	3
<b>Competitive Preference Priority 4</b>		
<b>Best Practices to Improve Struggling School/LEAs</b>		
1. Struggling Schools	3	0
<b>Sub Total</b>	3	0
<b>Competitive Preference Priority 5</b>		
<b>Serving At-Risk Students</b>		



1. At-Risk Students	3	1
<b>Sub Total</b>	<b>3</b>	<b>1</b>
<b>Competitive Preference Priority 6</b>		
<b>Best Practices for Charter School Authorizing</b>		
1. Best Practices	5	3
<b>Sub Total</b>	<b>5</b>	<b>3</b>
<b>Total</b>	<b>123</b>	<b>91</b>

# Technical Review Form

Panel #2 - Panel 2 - Idaho - 1: 84.282A

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

Applicant: Bluum, Inc. (U282A180005)

## Questions

### Selection Criteria - Quality of Project Design

1. The Secretary considers the quality of the design of the proposed project. In determining the quality of the design of the proposed project, the Secretary considers:

Reader's Score: 10

#### Sub Question

1. (1) The extent to which the proposed project demonstrates a rationale

#### Strengths:

The project proposal describes a rationale. The project proposal essentially explains that Idaho's growing charter sector is well-established, high performing, and has strong public support, and therefore charter schools are part of the solution to the state's school overcrowding problem resulting from a rapidly growing population (p. e37-40).

The project proposal contains a logic model on page e70 with long-term goals that align with the project goals on page e40, and the logic model also has key project components that align to the activities described on pages e41-47.

Most of the goals support the project objectives, and in turn, most of the activities support the goals. Specifically, the relationship between Objective 1, Goals 1.1 and 1.2, and Activities (b)1.1, (b)1.2, and (b)1.3 is clear. The same is true of Objective 2, Goal 2.1, and Activities (b)2.1, (b)2.2, and (b)2.3.

#### Weaknesses:

Goals 3.1 and 3.2 do not clearly support Objective 3 (p. e40), which makes the relationship between those goals, Objective 3, and Activities (b)3.1 and (b)3.2 unclear (p.e 46-47). The project proposal does not adequately explain how increasing academic outcomes for students in charter schools and all schools will lead to evaluation and dissemination of successes and lessons from charter schools to the larger education system. Consequently, the attached activities (Activities (b)3.1 and (b)3.2) are confusing. While Activity (b)3.1 to track, analyze, and report student achievement and growth data supports Goals 3.1 and 3.2, it does not support Objective 3. However, it is not clear how Activity (b)3.2 to engage parents and community leaders supports either Goals 3.1 and 3.2 or Objective 3.

While the project proposal clearly articulates the key project components (i.e., activities) and describes the relationship between most of the key activities and relevant outcomes, the project proposal is not clear about how the activities are informed by research or evaluation findings, as required under the definition of "demonstrates a rationale" as defined by federal regulations (34 CFR 77.1) and the notice inviting applications.

Reader's Score: 7

## Sub Question

2. (2) The extent to which the goals, objectives, and outcomes to be achieved by the proposed project are clearly specified and measurable.

### Strengths:

The table on page e40 illustrates the project's high-level objectives and its more detailed goals. Goals 1.1 and 1.2 contain specific and measurable targets. For example, increasing the number of charter school seats by 8,200 students within five years is specific and measurable in quantity and time. In addition, Goals 2.1, 3.1, and 3.2 are measurable in nature. For example, increasing the percentage of charter schools in "authorizers' portfolios identified as quality and/or improving" (Goal 2.1) can be measured even if the project proposal does not include a specific target for this particular goal.

### Weaknesses:

Goal 2.1 is not specific. It is not clear to what degree the project seeks to increase the percentage of charter schools within authorizers' portfolios identified as quality or improving.

Goals 3.1 and 3.2 are not specific. Goal 3.1 is to increase the academic outcomes for charter school students, and Goal 3.2 is to increase academic outcomes for all students. Academic outcomes are "determined by meeting or exceeding" targets set by Idaho's ESSA plan. The application references the academic achievement and academic growth targets in indicators 1 and 2 on page e63. However, it is not clear whether Goals 3.1 and 3.2 are measured by 1) the number of schools that meet the targets in the referenced indicators or 2) the degree that the group's (charter or all schools) student averages meet the targets in the referenced indicators.

**Reader's Score: 3**

## Selection Criteria - Objectives

1. The ambitiousness of the State entity's objectives for the quality charter school program carried out under this program.

**Note: In response to this criterion, an applicant may address (or cross reference) some or all of the components of application requirements (I)(A)-(G) in this notice, which require the applicant to provide a description of the State entity's objectives in running a quality charter school program and how the objectives of the program will be carried out.**

### Strengths:

The objective to increase the number of students, especially those that are educationally disadvantaged or in rural areas, attending high-quality charter schools by 8,200 is significant and ambitious in that it promotes continued, meaningful improvement for the charter school sector and the students in Idaho. Considering Idaho's charter schools currently serve over 20,000 students (p. e41), the objective amounts to roughly a 40% increase in the number of students within five years. The specific subgrant objectives on page e41 for start-up, expansion, and replication of high-quality charter schools also support the ambitiousness of this overall objective. Further, the supporting activities of developing charter school leadership talent pipelines (p. e41-43) and providing technical assistance to charter applicants (p. e43-44) promote continued, meaningful improvement for subgrant recipients.

Objective 2 is ambitious in that it promotes continued, meaningful improvement for authorized public chartering agencies. The supporting activity to hire a nationally recognized charter authorizing expert to evaluate the PCSC and state charter school policies should be helpful in identifying areas for improvement in the state's authorizing work (p. e45-46). In addition, the supporting activity to coordinate authorizing workshops provides improvement opportunities to less advanced authorized public chartering agencies (p. e46).

The objective to evaluate and disseminate the lessons learned from high-quality charter schools to improve the broader education system is ambitious. The supporting activity to track, analyze, and report student achievement data is significant, especially because Bluum plans to share its findings on a national scale, and because Bluum will issue three reports over the course of the project, there is potential for continued, meaningful improvement to the broader education

system if the right agencies or organizations can extract useful information from the reports (p. e46-47).

**Weaknesses:**

While the idea behind Objective 2's supporting activity to strengthen the capacity of the PCSC is good, the explanation of what this entails does not inspire confidence that it is an ambitious sub-objective. The application explains that a subgrant would allow the PCSC to purchase a charter school performance management software (p. e45), but such software would not likely result in continuous and meaningful capacity building.

Part of Objective 3's ambitiousness is the use of charter school lessons to improve the broader education system, but the supporting activities and sub-objectives fall somewhat short of reinforcing this. The supporting activity to track, analyze, and report student achievement data settles for passive notification through report dissemination rather than setting a sub-objective to use the information in a targeted or strategic way that would lead to more meaningful improvement of the education system.

**Reader's Score:** 17

**Selection Criteria - Quality of Eligible Subgrant Applicants**

**1. The likelihood that the eligible applicants receiving subgrants under the program will meet those objectives and improve educational results for students.**

**Strengths:**

Bluum has a track record of supporting the start-up of high-quality charter schools. Table 5 on page e49 illustrates that Bluum-supported charter schools outperform other charter schools in many different student achievement measures.

Bluum has a fair and rigorous process for selecting eligible applicants who demonstrate a high likelihood of establishing a new high-quality charter school or expanding or replicating an existing high-quality charter school. The process includes a request for proposals with clear requirements, external expert peer reviewers free from conflicts of interest, standardized criteria and scoring, a final review to ensure all requirements are met, and selection based on highest scores (p. e51-56).

Bluum has rigorous criteria for the selection of eligible applicants as subgrant recipients. Bluum uses its "seven lessons" that serve as critical components of high-quality charter schools to inform its criteria (p. e49-51). Each criterion in the review matrix used for scoring subgrant proposals from eligible applicants corresponds to one or more of the lessons (p. e528-532).

By proactively seeking out prospective subgrant applicants who have demonstrated success, Bluum increases its chances of awarding subgrants to eligible applicants who will help it meet the project objectives. In addition to releasing a request for proposals, Bluum will work with authorized public chartering agencies to identify eligible applicants who have met or exceeded performance expectations (p. e57-58), and there are a number of existing high-quality charter schools ready to replicate or expand (p. e59-61).

**Weaknesses:**

The review matrix used for scoring subgrant proposals from eligible applicants does not focus on educationally disadvantaged students or students in rural areas, which are primary targets according to Objective 1 of the project. The review matrix has a single criterion to assess whether an eligible applicant serves "primarily rural, low-income, minority, students with services, or at-risk populations" (p. e529). With dozens of criteria all worth the same amount of points, that particular criterion becomes much less important to eligible applicants, which in turn affects Bluum's ability to meet one of the project's main objectives. The project proposal does not describe how else Bluum will select eligible applicants that serve educationally disadvantaged students or students in rural areas.

## Selection Criteria - State Plan

### 1. The State entity's plan to--

- 1) Adequately monitor the eligible applicants receiving subgrants under the State entity's program;
- 2) Work with the authorized public chartering agencies involved to avoid duplication of work for the charter schools and authorized public chartering agencies; and
- 3) Provide technical assistance and support for--
  - i. The eligible applicants receiving subgrants under the State entity's program; and
  - ii. Quality authorizing efforts in the State.

#### Strengths:

Bluum's monitoring plan covers all of the essential areas: setting performance expectations, ongoing monitoring and regular reporting of those expectations, and corrective actions if expectations are not met. Subgrant performance contracts aligned with the authorized public chartering agency's performance certificate will set important expectations through seven key indicators and attached benchmarks and targets (p. e62-64). Bluum will ensure accountability through ongoing monitoring and technical assistance, and its annual reporting requirements of all subgrantees adds another layer of accountability (p. e64-65). Overall, Bluum's monitoring plan adequately ensures that subgrants are executed with fidelity.

Bluum's coordination with authorized public chartering agencies to use existing data and processes should avoid duplicating work. Using compliance and academic data included in school performance certificates will reduce the amount of redundant work on eligible applicants seeking replication or expansion and the reporting burden on subgrantees (p. e65). Further, building on authorized public chartering agencies' application processes and using the resulting information, such as application evaluation scores, adds efficiencies to Bluum's subgrant application process for new charter schools (p. e65-66).

Bluum has a plan to provide technical assistance and support for both eligible applicants interested in applying for subgrants and eligible applicants receiving subgrants. In addition to technical assistance PCSC already provides through new charter petitioner guidance, pre-opening guidance, and new school leader orientation (p. e66-67), Bluum plans to provide technical assistance through in-person workshops and webinars to eligible applicants interested in applying for subgrants (p. e52, e54), an onsite visit within the first 12 months of school operation (p. e64), and other means, including phone, email, and in-person meetings (p. e64-65). Bluum also plans to "coordinate with the PCSC and outside experts in developing and coordinating training that supports charters in their effective implementation of [subgrant] funds" (p. e68).

Bluum's plan to support quality authorizing efforts in Idaho will benefit the work of the PCSC and should result in some improvements to other authorized public chartering agencies. The portfolio and performance management software will help streamline the PCSC's monitoring and reporting practices (p. e68-69). The real strength of the plan, however, is the use of a national authorizing expert to review and make recommendations to improve state policies and policies and practices of the PCSC (p. e69). Other authorized public chartering agencies could improve their own authorizing policies and practices as a result of changes to state policies or by learning lessons from the PCSC. In addition, the project's proposal to coordinate authorizing workshops provides improvement opportunities to less advanced authorized public chartering agencies (p. e46).

#### Weaknesses:

It is not clear to what degree Bluum will be directly providing technical assistance or who is responsible for providing the various technical assistance supports. At one point the project plan states that "Bluum staff will provide ongoing technical assistance" for eligible applicants receiving subgrants (p. e64-65), but at another point the project plan seemingly contradicts this by stating that "Bluum will work with the PCSC and partner organizations that have staff capacity and

expertise in providing effective direct technical assistance to schools” (p. e68). It is not clear from these two statements who will be providing technical assistance and to what degree.

**Reader's Score:** 17

### **Selection Criteria - Quality of the Management Plan**

- 1. The Secretary considers the quality of the management plan for the proposed project. In determining the quality of the management plan for the proposed project, the Secretary considers:**

**Reader's Score:** 13

#### **Sub Question**

- 1. (1) The adequacy of the management plan to achieve the objectives of the proposed project on time and within budget, including clearly defined responsibilities, timelines, and milestones for accomplishing project tasks**

#### **Strengths:**

The management plan is adequate to achieve the objectives of the proposed project on time and within budget. The budget narrative (p. e653-658), the activities described in the Objectives section of the project proposal (p. e41-48), and the activities in the management plan align.

The management plan contains clearly defined goals, deliverables, and responsible parties. The logic model on page e70 contains the short-, mid-, and long-term project goals, which include some general milestones. The management plan in the table on pages e71-73 specifies which organization is responsible for each project activity and the deliverable resulting from each activity. The activities align with and are sufficient to achieve the project objectives. The timeline for the subgrant application process in the table on page e54 is clear and achievable, and the timeline table aligns with the management plan for Object 1 (p. e71-72).

#### **Weaknesses:**

Some of the activities in the management, particularly for Objectives 2 and 3, lack clearly defined timelines. For example, in considering the first activity under Objective 2 (p. e72), it is not clear when the PCSC will partner with a “national charter group to launch and implement [the] portfolio [and] performance management software” because there is no date or timeframe attached.

**Reader's Score:** 9

- 2. (2) The extent to which the time commitments of the project director and principal investigator and other key project personnel are appropriate and adequate to meet the objectives of the proposed project**

#### **Strengths:**

There are several personnel positions with time dedicated to the proposed project, including a full-time position responsible for the daily operations of this grant (p. e74). In addition to the full-time Director of Federal Grants and Support, three other positions have time commitments to the project. As a whole, there appears to be enough dedicated personnel time to meet the project objectives. The project proposal describes generally the responsibilities of each of the key project personnel (p. e74-75), giving a high-level idea of who will accomplish which project tasks.

**Sub Question**

**Weaknesses:**

The management plan does not specify which key project personnel are responsible for the specific project deliverables and tasks, which makes the staffing justification less clear. For example, Bluum's CEO and CFO will each dedicate 40% of their time to the project, which seems like an unnecessarily large amount of time being devoted by two leadership positions considering their roles in the project are described as largely supervisory in nature (p. e74).

**Reader's Score: 4**

**Selection Criteria - Parent and Community Involvement**

**1. The State entity's plan to solicit and consider input from parents and other members of the community on the implementation and operation of charter schools in the State.**

**Strengths:**

Using expertly conducted research on the perspectives of a range of community stakeholders will likely yield keen and useful insights. Phase one and two of the parent and community involvement plan calls for the use of focus groups and surveys of different constituent groups, including parents, teachers, students, and community leaders (p. e76-77). Contracting with a well-regarded national education research group to conduct the focus groups and surveys ensures that the research results will be valid, credible, and valuable.

Sharing the survey results with charter leaders and consortium partners through in-depth briefings (p. e77-78) is a positive way to reflect on community feedback that does not undermine charter school operations. The project proposal contemplates using these briefings, which occur every other year, as feedback loops. The results will also be shared with the broader public to facilitate conversations related to the implementation and operation of charter schools in Idaho.

Overall, Bluum's approach to parent and community engagement is thoughtful, transparent, and non-intrusive to charter schools.

**Weaknesses:**

It is not clear how Bluum will use or share the qualitative data collected from the focus groups (p. e76). During phase three of the parent and community involvement plan (p. e77-78), the project proposal explains how the quantitative data from the surveys will be shared, but there is no mention of qualitative data.

**Reader's Score: 9**

**Selection Criteria - Flexibility**

**1. The degree of flexibility afforded by the State's charter school law and how the State entity will work to maximize the flexibility provided to charter schools under such law.**

**Strengths:**

Idaho's state law affords charter schools with many of the critical flexibilities necessary for them to succeed. Of utmost importance, charter schools in Idaho are "legally autonomous schools with independent charter school boards" (p. e78). Being legally autonomous should provide charter schools with the flexibility they need to make decisions on academics, finances, and operations.

Bluum works to maximize the flexibility provided to charter schools mainly through legislative means. Bluum will work closely with other stakeholders, especially the Idaho Charter School Network, to maintain and expand charter school operational flexibility (p.e 79).

**Weaknesses:**

Charter schools likely lack flexibility in how they can spend state funds. The resource allocation model described in Competitive Preference Priority 2 provides funding to charter schools based on positions and “for specific programs or purposes” (p. e23). This suggests that state funds allocated to charter schools can only be used for specific purposes, which could greatly reduce operational flexibility.

Charter schools lack some flexibility in hiring certain school administrators. The project proposal explains that the Idaho Charter School Network tried to get a bill passed that “sought the flexibility to hire--without going through traditional certification routes--alternative school administrators who have been successful in the military, law, business, or government” (p. e79). The bill did not become law, which suggests that charter schools are missing some level of flexibility over personnel decisions.

**Reader's Score: 3**

**Priority Questions****Competitive Preference Priority 2 - Equitable Financing**

- 1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located ensures equitable financing, as compared to traditional public schools, for charter schools and students in a prompt manner.**

**Strengths:**

Charter schools in Idaho have equitable access to state and federal funds as compared to traditional public schools pursuant to state law. Both charter schools and school districts receive state funding based on positions and specific programs while federal fund distributions mostly depend on poverty rates (p. e23). State and federal funds earmarked for special education services follow the student whether he or she is an enrolled in a charter school or traditional public school, and charter schools also receive the same state allocation for transportation costs as other public schools (p. e24).

Charter schools in Idaho receive state and federal funds in the same prompt manner as other public schools pursuant to state law. Idaho’s Department of Education can make advance payments to new charter schools or existing charter schools that have grown a certain amount to assist with start-up or growth costs. In all other scenarios, the State of Idaho distributes quarterly payments to all public schools, including charter schools. (p.e 23)

There are efforts underway to change the funding formula to create more parity for charter schools that serve high-needs students. A legislative committee, the Idaho Public School Funding Interim Committee, is studying a student-based budgeting model that “would weight factors like student poverty and English Language Learners” (p. e25).

**Weaknesses:**

Charter schools in Idaho do not have equitable access to local school district funding. School districts use local funds from property taxes at their discretion, and charter schools do not have any authority to access similar local revenues. This creates a funding disparity of about \$1,500 less per pupil for charter schools than traditional public schools. (p. e24)

The legislative committee’s efforts to change the funding formula still have a long way to go, and it is not clear whether those efforts will affect local school district funding. The legislative committee will not make a recommendation to the Idaho Legislature until 2019 (p. e25) and then will need to endure the legislative process. Further, the project proposal does not explain if the legislative committee is studying the funding formula for both state and local funding or just state funding.

While Idaho provides charter schools equitable access to state and federal funds, the disparity in local funds creates glaring per-pupil financing inequities between charter schools and traditional public schools. Even if the 2019 Idaho Legislature approves the committee’s funding formula recommendation, it is not clear if it will affect local funding.



### Competitive Preference Priority 3 - Charter School Facilities

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located provides charter schools one or more of the following:

- a) Funding for facilities;
- b) Assistance with facilities acquisition;
- c) Access to public facilities;
- d) The ability to share in bonds or mill levies;
- e) The right of first refusal to purchase public school buildings; or
- f) Low- or no-cost leasing privileges.

#### Strengths:

Charter schools receive state funding for facilities through a variety of statutory mechanisms. Charter schools receive a "per-pupil facilities allowance" based on a percentage of the average school district per-pupil facilities funding from bonds and levies, proportional funds for maintenance and repairs through the School Facilities Maintenance Match program, and state lottery facilities funds on a per-capita basis (p. e25).

Charter schools have some level of assistance with facilities acquisition. A nonprofit lender and real estate developer, Building Hope, has provided some charter schools with low-interest loans to help secure facilities financing and keep debt payments low for the first five years of acquiring building space (p. e26).

#### Weaknesses:

The extent of the funding for charter school facilities is not clear. While the project proposal lists the various per-pupil dollar amounts charter schools recently received for each of the facilities funding mechanisms (p. e25), it is not clear how much of the charter schools' facilities costs this funding covers. There is not enough justification to determine that charter schools receive adequate or significant facilities funding relative to facilities costs because Bluum does not include background information in the project proposal on the costs of facilities for charter schools in Idaho.

The facilities acquisition assistance is limited. Building Hope has assisted only a few charter schools (six) since 2014 (p. e26), which means the majority of charter schools in the state have not received assistance with facilities acquisition.

### Competitive Preference Priority 4 - Best Practices to Improve Struggling School/LEAs

1. To receive points under this priority, an applicant must demonstrate the extent to which the State in which it is located uses best practices from charter schools to help improve struggling schools and local educational agencies.

#### Strengths:

No strengths found.

#### Weaknesses:

The project proposal describes "innovation schools" but is not clear about how they fulfill Competitive Preference Priority 4, particularly whether they are charter schools. The project proposal goes into detail about innovation schools, how they operate, and what Idaho hopes they achieve (p. e27-28). However, the application makes statements, such as describing innovation schools as "charter-like" (p. e27), that give the impression that innovation schools are not charter schools. The Local Innovation School Act attached in the appendices (p. e243-245) contemplates that charter schools can be

innovation schools, but innovation schools are not necessarily charter schools because they can be any public school. Regardless of any potential innovation schools hold, they are not relevant to the purposes of Competitive Preference Priority 4 if they are not charter schools.

The project proposal gives specific examples of rural charter schools collaborating with a school district or district school (p. e28-29), but it does not describe how the State of Idaho encouraged or enabled those collaborations or any other systematic effort to use best practices from charter schools to help improve struggling schools and districts.

**Reader's Score: 0**

### **Competitive Preference Priority 5 - Serving At-Risk Students**

- 1. To receive points under this priority, an applicant must demonstrate the extent to which it supports charter schools that serve at-risk students through activities such as dropout prevention, dropout recovery, or comprehensive career counseling services.**

#### **Strengths:**

The Idaho Public Charter School Commission ("PCSC"), a partner of the applicant, supports "alternative charter schools" by using "alternative indicators" in its performance framework. State law requires alternative schools to "offer programs clearly designated to serve at-risk students" and allows alternative charter schools to negotiate "differentiated performance targets" (p. e30). State law and the PCSC's performance framework sets up a system ready to support charter schools that serve at-risk students.

#### **Weaknesses:**

The project proposal does not demonstrate how Bluum, Inc. ("Bluum") supports charter schools that serve at-risk students through activities such as dropout prevention, dropout recovery, or comprehensive career counseling services. The project proposal describes a charter school that will serve at-risk students being launched by two school leaders trained by a fellowship managed by Bluum (p. e30-31). However, the project proposal does not describe the charter school as offering services similar to the aforementioned activities, and Bluum's support of the school is faint at best. Further, while the PCSC as a partner of Bluum contributes to a system ready to support charter schools that serve at-risk students (p. e30), the project proposal does not describe Bluum's role in partnering with the PCSC, if any, to support such charter schools.

**Reader's Score: 1**

### **Competitive Preference Priority 6 - Best Practices for Charter School Authorizing**

- 1. To receive points under this priority, an applicant must demonstrate the extent to which it has taken steps to ensure that all authorized public chartering agencies implement best practices for charter school authorizing.**

#### **Strengths:**

The PCSC, a partner of the applicant, has implemented some authorizing best practices. The PCSC has pre-opening guidance for newly approved charter applicants (p. e67), "performance certificates [that] clearly delineate school and authorizer roles and responsibilities" (p. e33), a comprehensive closure protocol (p. e333-345), and a performance framework that measures academics, operations, and finances (as illustrated in the sample annual school performance report on pages e266-287).

**Weaknesses:**

The project proposal does not demonstrate how Bluum has taken steps to ensure that all authorized public chartering agencies implement best practices for charter school authorizing. The project proposal explains actions the PCSC has taken to implement best practices for authorizing, but the project proposal does not describe Bluum's role in partnering with the PCSC, if any, to ensure the implementation of authorizing best practices. The project proposal describes Bluum's plans for improving authorizing practices under this grant program but not what it has done in the past. Further, while the PCSC has implemented some authorizing best practices, the project proposal does not explain how either Bluum or the PCSC has taken steps to ensure the other public charter authorizing agencies done so as well.

**Reader's Score:** 3

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