

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

Status: Submitted

Last Updated: 06/26/2020 05:05 PM

Technical Review Coversheet

Applicant: South Carolina Department of Education (S282A200022)

Reader #1: *****

	Points Possible	Points Scored
Questions		
Selection Criteria		
Quality of Project Design		
1. Project Design	35	24
Quality of Eligible Subgrant Applicants		
1. Subgrant Applicants	15	11
State Plan		
1. State Plan	35	27
Quality of the Management Plan		
1. Management Plan	15	13
Sub Total	100	75
Priority Questions		
Competitive Preference Priority		
Competitive Preference Priority 3		
1. CPP3	3	2
Competitive Preference Priority 4		
1. CPP4	4	4
Competitive Preference Priority 5		
1. CPP5	2	1
Competitive Preference Priority 6		
1. CPP6	3	3
Competitive Preference Priority 7		
1. CPP7	4	2
Sub Total	16	12
Total	116	87

Technical Review Form

Panel #11 - CSP State Entities - 7: 84.282A

Reader #1: *****

Applicant: South Carolina Department of Education (S282A200022)

Questions

Selection Criteria - Quality of Project Design

1. a. Quality of Project Design

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: 24

Sub

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

Strengths:

The applicant has identified promising practices which are showcased at professional conferences and disseminated. Such practices as early college, dual enrollment and specialized instruction focus (e27-28) are both used in some charter schools and serve as examples for other schools looking to improve student outcomes (e28).

The applicant will feature technical assistance and professional learning opportunities to encourage collaboration and sharing of best practices between charter schools, non-charter public schools and non-charter LEAs (e42).

The applicant will use the information from cited article (e 34) to develop technical assistance that will be "...needs-based and focus on topics which both the stakeholders self-identify as areas of need..." (e35) and support improved outcomes for struggling schools.

The applicant includes a best practices rationale to help authorizers identify poorly performing charter schools that may be candidates for turnaround (e35) to provide an alternative to closure and non-renewal for struggling charter schools.

The applicant will create the position of Charter School Development Manager (e37) as a strategy to enable the applicant to provide cohesive support to the opening of new charter schools.

The "incubator program" (e37 and e61) provides focused support for the opening of new charter schools.

The applicant includes a best practices rationale to help authorizers identify poorly performing charter schools that may be candidates for turnaround (e35) to provide an alternative to closure and non-renewal for struggling charter schools.

The applicant will create the position of Charter School Development Manager (e37) as a strategy to enable the applicant to provide cohesive support to the opening of new charter schools.

The "incubator program" (e37 and e61) provides focused support for the opening of new charter schools.

Weaknesses:

The rationale behind building capacity through training and professional learning is not thoroughly research supported as the citation provided by the applicant does not indicate a direct tie to leadership education as a key to high-quality charter schools: "To be sustainable, you have to build everyone's capacity...that doesn't happen overnight" (e34) doesn't tie research to the professional learning.

Reader's Score: 11

2. (2) **The extent to which the methods of evaluation include the use of objective performance measures that are clearly related to the intended outcomes of the project and will produce quantitative and qualitative data to the extent possible; and**

Strengths:

The applicant provides a number of performance measures that assess whether or not a project activity has taken place and if it took place successfully (process measures) such as the number of applicants working with the CSDM, participation in the Incubator program (e61) and holding an annual meeting (e44-47). This enables the applicant to have timely, objective and relevant performance measures.

The applicant provides a baseline (when available) against which to measure objective achievement (e44-47).

Performance measures are related to project outcomes, as they measure the availability of charter school options, and assess the implementation of activities intended to strengthen authorizer quality (e.g., the number of eligible subgrantees receiving continuation awards (e44)).

The applicant includes outcome data annually, such as student achievement data, to evaluate how well authorizers were able to improve student outcomes (e45-47).

Weaknesses:

Some of the performance measures do not have a time associated with them. For example, Increase the number of charter schools in operation around the nation, Support and sustain subgrant recipients to ensure success throughout full subgrant cycle, Strengthen the supports provided to new subgrant recipients through the Incubator program (e44), Charter schools serving high school students will provide high quality instruction, resulting students achieving success through graduation (e46) do not contain a time-based element.

"Support and sustain subgrant recipients to ensure success throughout full subgrant cycle" (e44) lists 85%. However, it is not clear what the percentage represents. The same is true of "Strengthen the supports provided to the new subgrant recipients through the Incubator program" (e44) lists the target as 85% without identifying what it is a percentage of.

Publishing an annual bulletin and holding quarterly meetings are activities, not measures of progress towards an outcome (e45).

"Federal cost per student in implementing a successful school" is not a measure of progress towards the outcome

Sub

"Effective use of charter schools as a means to education students in the public school system (e46).

The applicant's three main objectives: Increase high-quality charter school options..., Strengthen and support authorizer quality... and Increase community awareness... (e16-17) are not measurable and definitions of "high-quality" and how high-quality will be evaluated are not provided.

Reader's Score: 11

3. (3) The ambitiousness of the State entity's objectives for the quality charter school program carried out under the CSP State Entities program

Strengths:

The applicant's second objective is to improve authorizer quality which will be measured by conducting an evaluation of authorizing practices aligned to national best practices and having 100% participation in the survey/evaluation and by increasing the number of authorizer's implementing at least 75% of the essential authorizing practices (e47). This goal is "ambitious" in that it strives for all authorizers to implement a large percentage of "essential authorizing practices" (e47).

Weaknesses:

The applicant does not supply detailed and comprehensive rationales for the ambitiousness of the objectives and outcomes on performance measures. The objectives and measures, while attainable, do not qualify as "ambitious" (e48-50).

The goals of increasing student enrollment by 2% each year (e44), increasing the number of charter schools achieving "meets/and or exceeds" on state accountability reports (e45) do not meet the definition of "ambitious." 77 of their 83 charters already meet that baseline (e45) which indicates it is not a high achievement bar.

The goals for student outcome improvement also do not qualify as "ambitious," as they seek to increase by 1% per year a "meets and/or exceeds" score (e45-46). The eighth grade baseline for math is 33% meet or exceed. An ambitious objective would seek to increase such low scores by a higher percentage.

The third objective, to increase community awareness does not have outcome measures (only activities and process measures) (e47) and the statement that increased awareness and more "accurate perception" will "...result in stronger community supports and encourage existing charter schools to reach and maintain high quality" (e48) is not supported by any citations of research or experience.

Reader's Score: 2

Selection Criteria - Quality of Eligible Subgrant Applicants

1. b. Quality of Eligible Subgrant Applicants

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

Strengths:

The applicant submitted a draft of the RFP for the subgrants (e105-136) that provides detailed requirements including timelines, roles and responsibilities, community involvement, financial sustainability, charter school management and information on the peer review process, that increase the likelihood of an applicant having a plan in place that will improve educational outcomes (e105-136).

The applicant describes in detail how parents and the community will be informed about the CSP subgrant program (e52).

The applicant provides a detailed description of the peer reviewer selection process (e53-54) and the peer review process (e54).

The subgrant application requires inclusion of a student transportation plan (e55) and a sustainability plan (e53). Requiring a sustainability plan from subgrant applicants will support maintaining the charter school past the CSP funding period.

The applicant’s draft RFP for subgrant funds addresses key requirements of the CSP grant program and presents a detailed plan for awarding subgrants (e105-136). The applicant included a detailed description of the RFP review process (e54).

Weaknesses:

It is not apparent in the subgrant RFP how the subgrantees will ensure improved educational results for students. The scoring rubric for the RFP (e145-154) does not specifically identify requirements for student outcomes.

It is not clear through the subgrant process how the process will support diverse models, as the rubric does not include relevant criteria. The applicant states that the RFP process “...does not pose a barrier for diverse and unique models...” (e51) which does not indicate active support for diverse models.

The applicant will “encourage” new charter high schools and charter schools in rural communities (e51). However, they provide no detail on how this will be accomplished.

Reader's Score: 11

Selection Criteria - State Plan

1. c. State Plan

The State entity’s plan to--

Reader's Score: 27

Sub

- 1. (1) Adequately monitor the eligible applicants receiving subgrants under the State entity’s program;**

Sub

Strengths:

The subgrant RFP has a detailed set of benchmarks with a timeline that applicants must adhere to as part of the application (e117-120) that will enable the applicant to provide comprehensive monitoring.

Subgrantees must submit to monitoring by the applicant including site visits for programmatic and financial assessments (e121) that will enable the applicant to quickly identify deficiencies.

The applicant works collaboratively with charter school authorizers to determine and respond to issues of non-compliance (e56) to quickly identify risks for non-compliance.

Technical assistance and resources are provided to ensure that subgrantees are aware of requirements to prevent non-compliance (e57).

Subgrantees are notified of potential non-compliance issues prior to remediation needing to take place (e57), providing timely feedback to prevent non-compliance.

Weaknesses:

Although the applicant reviews subgrantee budgets to ensure compliance with allowable expenditures (e57), there is no focus described on ensuring that funding goes towards meeting educational needs.

Although the applicant requires subgrantees to submit a detailed plan outlining sustainability measures, beyond evaluating this plan the applicant does not provide details on how they will evaluate the implementation and success of the sustainability plan (e57-58).

The applicant does not provide detailed information on how deficiencies identified by monitoring will be addressed by the subgrantee.

Reader's Score: 7

2. (2) Work with the authorized public chartering agencies involved to avoid duplication of work for the charter schools and authorized public chartering agencies;

Strengths:

The applicant has streamlined the charter school application and the grant RFP so that, although there are two separate applications, there are enough similarities that enable subgrant applicants to use the same resources and sources of information to reduce duplication. This also reduces the burden for the authorized public chartering agencies in a significant way, as they can use the same data and information for both applications. Stakeholder feedback has been positive (e58).

In reporting, if more information is required the applicant can request additional information rather than having to resubmit the annual report or an added report (e58).

Sub

Weaknesses:

There is a separate system for uploading of subgrantee budgets from the system for federal grant submission. The applicant admits that this does result in duplication of effort (e59).

Reader's Score: 4

- 3. (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 applicant will provide technical assistance (TA) in three tiers – application development, new school assistance, and sustained support (e59).

The applicant is developing and implementing a position, the Charter School Development Manager (CSDM), dedicated to developing high-quality charter school applications (e59-60).

The CSDM will provide one-to-one and group assistance and respond to the needs of the charter school developers; provide research and resources; help collect and analyze data; help developers “navigate” systems; and be a resource for best practices (e60).

The applicant proposes an “Incubator” program to assist charters through the 36-month subgrant cycle. It will provide general TA and assistance focused on the individual needs of the subgrantees. It will focus on areas of need in policy development, board support, student handbook policies and other areas the applicant has found some new charters struggle with and include instructional practices that align with best practices (e61).

The applicant collaborates with the authorizers in the state to develop charter applications and includes conversations on application review and monitoring and feedback on the charter applications and responds to the expressed needs of the authorizers through conversations and feedback (e63).

Best practices to guide the charter application and authorizing process are taken from the National Association for Charter School Authorizers (NACSA) (e64).

The applicant provides TA to authorizers on big issues such as changes in charter school law (e65).

The applicant provides support for school closure protocols (e66).

Sub

Weaknesses:

The applicant describes some modalities, including one-to-one assistance and webinars (e57), but does not provide details on how the various modalities will be deployed and what the intended outcomes are.

There is no description of plans for TA to support student recruitment, enrollment and retention that promotes inclusion.

The plan to support high-quality authorizing (e63-65) does not provide sufficient detail on whether it provides TA on holding charter schools accountable for student outcomes and performance frameworks and other monitoring and evaluation topics.

Information on specific topics regarding high-quality authorizing were not provided in sufficient detail to identify if they will support high-quality authorizing (e64-65).

Reader's Score: 8

4. (4) 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; and

Strengths:

The applicant uses various methods of outreach to solicit input from parents and community members throughout the state including stakeholder meetings and collaboration with outside organizations (e67).

The charter application and the subgrant application require detailed description of the support from parents and the community and how parents and the community will be involved in the charter school (e67).

The applicant is developing a variety of platforms to solicit parent and community input including electronic, telephone, and email communication (e67).

The CSP Program Manager will serve as an “ombudsman” for parents and community members for charter school communications (e68).

The applicant will analyze responses to surveys to identify topics for TA sessions, the dissemination of information, and the use of communication to encourage support of charter schools (e68).

The applicant will foster partnerships and open communication through ongoing participation in community organizations’ events, conferences, and other programs (e69).

Weaknesses:

The applicant did not present a timeline of activities. Additionally, activities are described in a general manner and not detailed as to what data will be collected and used.

Reader's Score: 3

5. (5) 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

Sub

Strengths:

The applicant demonstrates a high degree of flexibility in how charter schools can operate, in that charter schools are exempt from laws governing other public schools (except impacting student health and safety) (e71) and can develop and implement programs of their own choice (e70).

Charter schools have control over their budgeting and finances (e70).

Non-charter public schools can convert to charters with 2/3 of staff and parents agreeing to the conversion (e71).

Charter school developers can select from multiple authorizers (e71) giving them the flexibility to select an authorizer that best suits their education model.

The applicant works with the legislature and within the SCDE to ensure that charter schools retain these flexibilities. Evidence of this work is ensuring flexibilities in teacher evaluation systems, food and nutrition programs, and facilities requirements (e72).

Weaknesses:

No weaknesses noted.

Reader's Score: 5

Selection Criteria - Quality of the Management Plan

1. d. Quality of the Management Plan

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

- 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; and**

Strengths:

The applicant provides a detailed timeline with milestones tied to the project's objectives (e73-76).

The resumes provided demonstrate adequate experience and qualifications to manage the project and accomplish the tasks in the management plan (e88-92).

The application will contract for a web-based grant management program to streamline and effectively manage the project (e77).

Roles and responsibilities for the objectives of the project (e.g., Subgrant Administration, Dissemination of Best Practices) are described in the management plan (e73-76).

Sub

The applicant's Grants Accounting staff will work closely with Charter School Program staff to ensure successful management of the program (e48).

Weaknesses:

The budget plan (e179) for the subgrantees is to subgrant up to eight awards each year, making the total amount of the awards either [REDACTED] (typical or targeted,) which may not be adequate to support high-quality charter schools, especially for the targeted schools serving high-needs populations.

Reader's Score: 9

2. (2) The adequacy of procedures for ensuring feedback and continuous improvement in the operation of the proposed project

Strengths:

The applicant will use subgrantee surveys and an external review process to ensure that feedback is received and used for continuous improvement (e77).

Weaknesses:

The applicant did not supply a comprehensive list of who they will provide feedback.

Reader's Score: 2

3. (3) 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 program Grant Manager will dedicate 100% of their time to the project (e79) and the Program Manager, the Project Director, will devote 30% of their time to the project (e79).

Other staff within the SCDE will provide support to the project (e79) and the proposed position of Charter School Development Manager is a full-time position (e37) that provides support to the project.

These time commitments are appropriate and adequate to meet the goals and objectives of the grant.

Weaknesses:

No weaknesses noted.

Reader's Score: 2

Priority Questions

Competitive Preference Priority - Competitive Preference Priority 3

1. CPP3 Competitive Preference Priority 3: Equitable Financing

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 applicant demonstrates the extent to which South Carolina (SC) funds charter schools and identifies both how the funding is equitable and where the funding is less than equitable. SC funds charter schools through a line-item budget appropriation. This amount is comparable to the funding for non-charters (e23).

Funding is timely, distributed monthly by the authorizers beginning July 1 after the approval of a charter school, and goes on for the life of the charter school (e23).

SC requires that charter schools, which are part of the LEAs applying for federal formula grants, must be considered by the LEA when applying for these funds, and requires that principals of the charter schools within an LEA verify, in writing, that they were consulted when the federal formula grant application was prepared (e24).

If LEAs don't distribute the proportional share of the federal funds to the charter school within 10 days of receipt, the LEA would be fined. The fines will be remitted to the charter school to make up for the amount withheld by the LEA (e24).

Weaknesses:

Funding for facilities differs for charter schools as compared to non-charter public schools. Charter schools must pay for facilities out of their state funding allotment, which is not true of non-charter public schools which receive funding for facilities and have access to bond initiatives (e23). This reduces the amount of state funding charter schools can use for educational purposes whereas non-charter public schools can use the full amount.

Reader's Score: 2

Competitive Preference Priority - Competitive Preference Priority 4

1. CPP4 Competitive Preference Priority 4: Charter School Facilities

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:

There is a statewide program available for charter schools to gain access to low-interest loans (e24), so although the state does not fund facilities, support for charter school facilities acquisition is accessible.

An annual conference for charter schools provides information on facilities acquisition to help charter schools learn how to manage searching for and funding facilities (e25).

Lists of vacant buildings must be made available to charter schools and charter schools have the right of first refusal for these facilities (e25). In addition, charter schools availing themselves of these properties must be given the same or better terms than the general public (e25).

Charter schools authorized by LEAs can share in bonds or mill levies and the applicant lists several charter schools that have done so (e26).

Weaknesses:

No weaknesses noted.

Reader's Score: 4

Competitive Preference Priority - Competitive Preference Priority 5

1. CPP5 Competitive Preference Priority 5: Best Practices to Improve Struggling Schools and Local Educational Agencies

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:

The applicant has a system for identifying struggling schools, both charter and non-charter public schools, and for providing targeted assistance through planning, evaluation, additional funding, and the work of transformation coaches (TCs) (e27).

The state uses data and successful charter school models to drive improvement in non-charter public schools (e27).

The SCDE has identified promising practices which are showcased at professional conferences and disseminated. Such practices as early college, dual enrollment, and specialized instruction focus (e27-28) are both used in some charter schools and serve as examples for other schools looking to improve student outcomes (e28).

Weaknesses:

The applicant does not supply specific examples of how the state is using best practices from charter schools to improve struggling non-charter public schools.

Reader's Score: 1

Competitive Preference Priority - Competitive Preference Priority 6

1. CPP6 Competitive Preference Priority 6: Serving At-Risk Students

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 applicant encourages charter schools to focus on critical needs students and has, in the past, provided priority points for charter schools proposing to serve at-risk students and will continue to encourage charter school applicant to focus on high-needs populations (e28).

The applicant lists various models of existing charter schools that focus on engaging students, such as “middle colleges” that enable students to graduate with an instructional “head start,” specialty theme schools such as health sciences and motorsports, virtual schools to help over-age and under-credited students, and programs for fragile and disadvantaged students (e28-29).

CSI (an authorizer) has scholarships for students graduating from their charters to enable post-secondary education for students who might otherwise not have considered it (e29).

All schools, including charter schools, serve at-risk students through statewide programs (e.g., Positive Behavioral Interventions and Supports, Multi-Tiered Systems of Support) (e30).

Weaknesses:

No weaknesses noted.

Reader's Score: 3

Competitive Preference Priority - Competitive Preference Priority 7**1. CPP7 Competitive Preference Priority 7: Best Practices for Charter School Authorizing**

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 applicant is developing a set of standards and principles for quality authorizing that align to state law, regulations, and standards (e31), and worked with a vendor and stakeholders to determine best practices for quality authorizing (e31).

The applicant provides professional learning targeted to the needs of the charter authorizers (LEAs) for federal compliance training (e31).

The applicant will collect and analyze data and feedback on authorizing practices to gauge what authorizing policies are already in place and how policies and practices are implemented by the authorizers (e32).

The applicant requires submission of an annual report on charter school performance which is used to ensure charter school monitoring and oversight are taking place (e32).

The applicant will work with authorizers to develop and implement a performance framework against which to evaluate charter school performance (e32).

Weaknesses:

The applicant does not have the authority to directly oversee charter school authorizers (e30) and, therefore, cannot ensure that best practices in authorizing will be implemented.

Sharing best practices at conferences (e27) does not necessarily mean that such practices are implemented or that the state or the charter school with the best practice is providing implementation support.

Reader's Score: 2

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Technical Review Coversheet

Applicant: South Carolina Department of Education (S282A200022)

Reader #2: *****

	Points Possible	Points Scored
Questions		
Selection Criteria		
Quality of Project Design		
1. Project Design	35	32
Quality of Eligible Subgrant Applicants		
1. Subgrant Applicants	15	14
State Plan		
1. State Plan	35	30
Quality of the Management Plan		
1. Management Plan	15	13
Sub Total	100	89
Priority Questions		
Competitive Preference Priority		
Competitive Preference Priority 3		
1. CPP3	3	2
Competitive Preference Priority 4		
1. CPP4	4	4
Competitive Preference Priority 5		
1. CPP5	2	2
Competitive Preference Priority 6		
1. CPP6	3	3
Competitive Preference Priority 7		
1. CPP7	4	4
Sub Total	16	15
Total	116	104

Technical Review Form

Panel #11 - CSP State Entities - 7: 84.282A

Reader #2: *****

Applicant: South Carolina Department of Education (S282A200022)

Questions

Selection Criteria - Quality of Project Design

1. a. Quality of Project Design

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: 32

Sub

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

Strengths:

The South Carolina Quality Charter School project (SCQCS) “strives to increase charter school options, particularly for educationally disadvantaged students, to increase the adoption of best practices by charter leaders and authorizers, and to invest in promising practices that increase public awareness and improve perception of charter schools in SC” (Project Abstract).

The applicant, the South Carolina Department of Education (SCDE) provided a research-backed logic model (e34-36) that is strongly informed by research, evaluation, and the State’s overall education strategy. The research findings, (leadership ability and data-driven decisions e34); the adoption and endorsement of the South Carolina Graduate Profile by South Carolina’s State Chamber of Commerce, Education Oversight Committee, State Board of Education, Arts in Basic Curriculum Committee and TransformSC; and the legislative codification of the Profile (e33-34) support SCDE’s philosophy that school improvement is a continuous process for all schools. The assertions that “you have to build everyone’s capacity” and that underperforming schools can benefit from turn-around efforts suggest that the SCDE CSP project is highly likely to realize the proposed outcomes. The strong alignment across these elements is indicative of the statewide effort to support struggling schools.

The project components address all the key priorities by explaining what activities the applicant will execute to achieve these priorities. As such the applicant has articulately met these criteria.

The applicant proposes to support the opening of 32 new charter schools (Project Abstract) and 3,200 new charter seats (e44) over the course of the grant period (and no replication or expansion schools e36-37). The rationale for the number of new charter schools is reasonably based on trend data from 2016 to 2020. The rationale for no replication subgrants is twofold. First, SC has no statutory provisions for replication of charter schools; and second, “under state law, each charter school must be independent of one another and exist as a separate entity” (37).

The SCDE has proposed several activities (technical assistance, mandatory charter school board training to develop or strengthen a cohesive statewide system that supports the opening of high -quality new charter schools. This is in part demonstrated by the SCDE proposal to create a Charter School Development Manager (CSDM) position to be housed at the Public Charter School Alliance of South Carolina (PCSASC), the only charter support organization in SC. This partnership between the SCDE and a charter support organization is key in the support

Sub

and development of new charter schools, as it allows for consistent, high quality statewide technical assistance to developers, builds an incubation program and capacity in the charter support organization, ensures a pipeline of high-quality charter schools and boards, builds strong SCDE and PCSASC relationships, and has no conflict of interest for the department of education (37-38). The proposed CSDM position is a value add to strengthening the existing statewide system of support and has a high potential to facilitate the SCDE's project outcomes.

The SCDE proposes to support charter schools in LEAs with a significant number of schools identified by the State for comprehensive support and improvement through the SCDE Office of School Transformation (OST) and in the same manner it supports all struggling schools in SC (i.e. school improvement professional development, The School Improvement Framework, the SC Evidence-based Intervention and Practices Guide and routine state and federal monitoring e40-41). In addition, the authorizers provide charter oversight via monitoring and the annual charters school report. SCQCS subgrantees receive additional needs based technical assistance, funds, training and monitoring to ensure that they are high-quality.

Additionally, having the SCQCS in the SCDE continues to support efforts to consistently share and implement of charter schools' best practice to improve struggling schools or to turn around struggling schools (for both charter and other public schools).

A major advantage of the SCDE initiating the SCQCS is that the SCDE may practice its philosophy that "to be sustainable, you have to build everyone's capacity to perform at a higher level, and that doesn't happen overnight" (e34). The ability of the SCDE to continue its current practices to support struggling schools and sustain that effort over time is critical to developing high quality schools (both charter and traditional public schools). This is in part evidenced in with the OST's School Improvement Assistant Director who provides "oversight and Management for all the states School Improvement. As such she is able to bring consistency, strong coordination and a cohesive statewide strategy to encourage collaboration and the sharing best and promising practices between charter schools, other public schools and LEAs.

Weaknesses:

No weaknesses noted.

Reader's Score: 15

- 2. (2) The extent to which the methods of evaluation include the use of objective performance measures that are clearly related to the intended outcomes of the project and will produce quantitative and qualitative data to the extent possible; and**

Strengths:

The applicant provided performance measures for objectives 1, 2, and 3 that are specific, measurable, achievable, relevant, and related to the intended project outcomes. They are also time bound. This is evidenced on pages e44-47, with specific performance measures for each of the objectives and a strong alignment of performance measures with the project Management Plan.

Each objective has at least one performance measure that can be reported annually, and in some cases several (e. 44-47).

Additionally, the SCDE proposes to contract with the University of South Carolina Research, Evaluation and Measurement Center (USC REM Center) to evaluate the SCQCS program effectiveness and management (e 43, 78). The use of an external evaluator to evaluate the SCDE's grant program is demonstrative of its efforts for continuous improvement and ensures a higher likelihood of the SCDE meeting the project goals and objectives.

Sub

Weaknesses:

While the Project Abstract and Budget Narrative indicate opening of 32 new charter schools over the course of the grant, performance measure 1b had no specific target indicated on page e44 or the Appendix Performance Measure form.

Reader's Score: 14

3. (3) The ambitiousness of the State entity's objectives for the quality charter school program carried out under the CSP State Entities program

Strengths:

The SCDE has clearly articulated ambitious, yet attainable objectives explicitly tied to a high-quality project. This is in part evidenced in performance measures 1D-adding 1 additional alternative charter school per year and 1E - increasing the number of SC charter schools by 8 each year.

Performance measures 2C and 2D (e47) are also ambitious. Increasing an authorizer survey participation to 100% and implementation to 75% of authorizer essential practices is especially ambitious when the SCDE has no oversight authority to authorizers (e32).

Weaknesses:

While Objective 3 performance measures address the focus of the objective -community awareness (e47,49-50), they do not address soliciting input from parents and the community engagement, or actual parent or community engagement or involvement.

Overall, it would have made for a stronger application to include actual charter school growth data, enrollment records, or student achievement goals, to support the rationale for why the objectives are ambitious.

Reader's Score: 3

Selection Criteria - Quality of Eligible Subgrant Applicants

1. b. Quality of Eligible Subgrant Applicants

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

Strengths:

The applicant provides a full and completely developed, subgrant plan that includes detailed descriptions of activities, timelines and/or processes for all the required components to the subgrant application. This is well evidenced as follows (e50-54).

The applicant has a strong track record that supports diverse charter models, which bodes well with continuing to do so. In the past, the SCDE has funded CSP subgrants to virtual and brick and mortar schools, schools with blended learning environments, content specific schools (i.e. motorsports, health professions, language immersion, and environmental science schools), and schools with diverse structural approaches (i.e. dual enrollment, early college, or extended school day or school year).

The subgrant application describes how the subgrant process provides priority points for: Districts without any charter schools or proposed location within a designated Opportunity Zone, low-performing schools, closing achievement gaps,

and at-risk students (e110-111).

The SCDE disseminates the SCQCS subgrant program information via the charter website, email contact lists, press releases in major newspapers, TV networks, radio, and public-school information officers (e52).

Overall, the SCDE has provided an extensive description of the entire subgrant application process and requirements. The detail and quality of the subgrant application itself, how the applicant will publicize the availability of subgrants, the requirements, and the review process cover in detail each of the following: roles and responsibilities of all parties (Subgrant application, e56); role of authorizer in reviewing charter school performance and operations (e53); family and community engagement activities (Subgrant application e148); flexibilities afforded to charter schools; (e70-72) and expenditures and activities as part of a sustainability plan.

The process for selecting peer reviewers and the process for reviewing and awarding subgrants is fully described in detail. This is in part demonstrated in the subgrant application (e124-125 and e54).

Reviewers must apply to the SCDE and are vetted for knowledge of and expertise with charter schools or alternative schools such as educators, school administrators, school board members, or charter developers. In addition, the SCDE selects the peer review team to reflect a balance of backgrounds, experience, race, and ethnicities. Three peer reviewers without a vested interest in any application being funded will evaluate each application using the scoring rubric (e146-154) to assess the quality of the proposed activities and the capability of the applicant to implement the proposed project. Reviewer scores are then averaged and ranked, and then the SCDE reviews the budget and competitive priorities before awarding subgrants.

The subgrant application provides a transportation plan (including plans for students for whom a lack of transportation provides a barrier) in its new charter school application. The SCDE uses that plan from approved charters to meet the subgrant requirement (e55).

Overall, it is clear through the comprehensiveness of this plan that the subgrant program will support high-quality charter schools that will improve educational results for children.

Weaknesses:

While the applicant has a strong track record of supporting diverse charter school models, it would have made for a stronger proposal to explicitly indicate support or priority points for rural charter and charter high schools.

Reader's Score: 14

Selection Criteria - State Plan

1. c. State Plan

The State entity's plan to--

Reader's Score: 30

Sub

- 1. (1) Adequately monitor the eligible applicants receiving subgrants under the State entity's program;**

Sub

Strengths:

The applicant presents a complete and comprehensive monitoring plan that addresses in detail how the applicant will monitor subgrantees regularly, identify risk quickly, and address any deficiencies found in the subgrantee promptly. This is in part evidenced from the already existing CSP subgrant monitoring process (e55). It is also evidenced in the detail and variety of activities noted below to ensure subgrantees are successful and meet all subgrant requirements.

- Subgrant applicants are provided the subgrant benchmarks, performance expectations, monitoring plans, etc. and must agree to all "terms and conditions" (e56).
- The SCDE's Office of Auditing Services conducts a "pre-award risk assessment" and pre-award audit questionnaire (e56).
- Desktop and on-site monitoring mitigate chances of subgrantees failure to comply with state or federal rules and regulations and/or other deficiencies that would lead to the discontinuation of grant funds (e56).
- The Office of Auditing Services conducts an annual risk assessment of subgrantees (e57)
- The applicant provides continuous needs based and formal technical assistance, meetings, calls, and emails on budgets, expenditures, allowable cost,s grant activity reports, etc. for the purpose of charter school "long-term success" (e57).

As such, the applicant has included in the monitoring plan, a description of numerous and rigorous monitoring activities and systems to ensure effective subgrant monitoring. The applicant has existing processes and procedures and staff with the knowledge, skills, and experience to provide effective subgrant monitoring.

The applicant is clear that monitoring will ensure that subgrantees are using the funds for activities to help meet the educational needs of their students, specifically including students with disabilities and English learners.

Weaknesses:

While the applicant's monitoring activities are ongoing, the applicant did not provide a monitoring timeline that indicated when reports were due or when desktop or onsite reviews occurred.

While the applicant requires a financial viability plan from its subgrantees (e57), it does not explain their processes to evaluate said plan and, as such, does not meet this criterion.

Reader's Score: 7

2. (2) Work with the authorized public chartering agencies involved to avoid duplication of work for the charter schools and authorized public chartering agencies;

Strengths:

The applicant has described the following as its efforts to avoid the duplication of work for charter schools and authorizers. The CSP subgrant and new charter school application have "similar requirements" (e58) and continued "efforts to streamline the two applications" (e58).

- Using the same charter school annual report required by statute and continuing to collaborate with authorizers to identify ways to facilitate the collection of all needed information from one report (e58).
- The Grants electronic management system (GEMS) is used for most federal Title programs for all schools in the state (including charter schools) and mitigates duplication of systems for Title programs (though, the grants accounting processing system (GAPS) is still used for CSP subgrants budgets e58-59). Using the same systems as other traditional schools reduces duplication of effort for charter schools and the SCDE.
- The SCDE proposes to solicit and contract for a platform to contain all CSP subgrant applications, awards, budgets, documentation, etc. (e59).

Sub

These are strong strategies to mitigate duplication of efforts, as such, these requirements are met.

Weaknesses:

There were no weaknesses.

Reader's Score: 5

- 3. (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 SCDE provided a complete and comprehensive plan to provide technical assistance to support subgrantees especially in the areas of opening and operating new high-quality charter schools. This is ably evidenced in the proposed specific TA in application development, new school assistance, and sustained support via the SCQCS (e59).

- **Application development:** The SCDE proposes to hire a Charter School Development Manager (CSDM) housed at the (Public Charter School Alliance of South Carolina (PCSASC) to provide TA and coaching on all aspects of developing a new charter school for developers (e38). The intent is to strengthen charter school applications "from their very inception" (e60).
- **New School Assistance:** Once the new school has been approved and awarded a subgrant, it would receive "assistance during the first few years" of operation through the new Charter school Incubator Program - again supported by the CSDM at PCSASC. As CSP subgrantees, they would receive continued TA in general statewide critical needs areas (i.e. boards, student enrollment, charter HR, and discipline policy and handbooks, instructional strategies and practices, annual charter meetings, access to some legal services, e61) and specific school-based needs.
- **Sustained support** includes quarterly TA sessions on a variety of topic and updates. These will be offered on-site, via webinars, or at conferences (e62).

The CSDE has existing authorizer relationships and TA supports to build and support quality authorizer efforts and capacity and proposes to continue and enhance those supports.

The SCDE proposes to serve as both a "guide and facilitator for authorizers" and proposes to continue its longstanding collaborations with authorizers via the following TA opportunities.

- **Soliciting feedback and collaborating** around the new charter school application which, by law, SCDE is responsible for developing and providing the template with guidelines (e63).
- **Providing high-quality charter application review process TA.**
- **Facilitating collaboration** "between and among authorizers.
- **Hosting authorizers on the application and application review process;** sharing state and national authorizer best practices and updates to charter law; providing TA sessions; assessing annual performance data of the schools; holding charter schools accountable to their performance agreements; conducting financial reviews and annual audits (e65); providing renewal (e64) and school closure protocols; and "increasing equity through practices and relationships" (e66).

The SCDE has clearly noted that while it does not have oversight over authorizers, it understands charter authorizer needs for technical assistance and serves all public chartering agencies in SC via webinars, individual and formal TA, conference sessions on national authorizer best practices, development of resources, and informal conversations and relationship building.

Weaknesses:

The SCDE was not specific on how often it would provide authorizer TA or provide a timeline for authorizer TA.

Reader's Score: 9

4. (4) 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; and

Strengths:

The SCDE provided a number of activities for both providing charter school information (e69) and soliciting input from the parents and other members of the community.

This is demonstrated by the following activities (some of which the department is currently doing, while others are enhancements or additional new activities) to engage the community.

- Providing an online feedback comment form and electronic survey (e67)
- Having the CSP Program Manager serve as a charter Ombudsman with an additional feedback form on the CSP webpage (e67-68)
- Current public perception surveys (e68)
- Attend and participate in stakeholder meetings (e69), regular association meetings, and conferences (e70)
- Collect anecdotal feedback (e67, 70).

The SCDE intends to use the data collected from these efforts to make determinations for TA, information dissemination and communication (e68), to "be responsive to constituents" (e68,) and "make proactive decisions" (e69). This is a reasonable plan to solicit and consider input.

Weaknesses:

The SCDE did not provide a timeline of its parent/community solicitation for input efforts.

Reader's Score: 4

5. (5) 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 applicant describes the flexibilities offered by South Carolina's charter law as follows.

- Charters have exemptions from laws and regulations applicable to public schools or school boards (e70), total control over their charter budgets and expenditures (e70), and can choose to charter from multiple authorizers (e71) and have the freedom to innovate or modify the school organizational structure (e70)
- The charter governing Board can function as the required School Improvement Council (e71).
- Charter schools can switch charter authorizers any time during the 10-year charter contract (e72)

As evidence that the applicant will work to maximize the flexibility allowed by law to greatly support charter schools, the SCDE noted how it has done so in the past (e72); charter school flexibility in teacher evaluation systems; flexibility in food and nutritional programs; and meeting facility timelines for new or renovated facilities.

Given the SCDE OST staff knowledge and experience with chartering in SC and the department's past efforts on behalf of charter flexibility, there is a strong likelihood of the OST staff continuing to work with the agency's legislative affairs coordinator (e72, Resumes Appendix B).

Sub

Weaknesses:

There were no weaknesses.

Reader's Score: 5

Selection Criteria - Quality of the Management Plan

1. d. Quality of the Management Plan

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

- 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; and**

Strengths:

The applicant presents a comprehensive and complete Management Plan (e73-76) inclusive of clear timelines, key responsible personnel, and milestones that are realistic and appropriate for the objectives of the grant.

The proposed budget narrative (Appendix e 179) is well aligned with the milestones of the management plan and provides adequate resources for all project tasks. As such, the responsibilities and milestones are adequate to ensure project success.

Per the Resumes (Appendix B,) all key project personnel have demonstrated qualifications to contribute to the project's success. Of positive note, the .15 in-kind OST Assistant Director brings the experience and expertise of being the prior CSP state Entities Grant Manager.

As well, she provides "oversight and Management for the department's Office of School Transformation (OST) School Improvement Team. As such, she can bring strong coordination and sharing of charter school best practices for struggling schools and vice versa.

The SCDE has "a Grants Policy... clear procedures and its Grants Program and Grants Accounting staff" to ensure internal accountability and compliance with applicable state and federal rules and regulations (e72-73).

Additionally, the PM will coordinate and work with external partners (e 79,) which include state/national consultants to provide to be determined TA. In addition, they will work with the Charter School Management Application Platform provider; PCSASC to house and manage the Charter School Development Manager (CSDM); and collaborate with the SCDE to provide the SC Charter Incubator Program. A mandatory Charter School Board Orientation will be provided and the USC REM Center will conduct an external evaluation (Appendix: Budget Narrative e189-193).

Sub

Weaknesses:

It is unclear if the Essential Authoring Practices Guide (e74) is the same thing as the template for the performance framework effort noted on page e32. This is of concern because the management plan does not indicate any work to “develop a broad template for a performance framework “(e32), which would be key to improving authorizer best practices.

Reader's Score: 8

2. (2) The adequacy of procedures for ensuring feedback and continuous improvement in the operation of the proposed project

Strengths:

The applicant provided a description regarding how they will receive and document feedback to make improvements to the project. This is evidenced in this plan as follows (e 73-76, 77-78).

- The applicant will obtain feedback from: subgrantees, authorizers, and the USC REM Center (77-78).
- The SCDE will collect the following types of data and feedback: TA and document surveys, subgrant recipient feedback in program reports regarding “the applicability and quality of the sessions,” quality of the material, mode of delivery, and provider effectiveness (e78). As well, the SCDE will receive ongoing and immediate feedback.

Of positive note: the applicant will partner with the University of South Carolina REM Center as their external evaluator of the CSP grant project (e78). They propose to utilize the REM center report “to strengthen internal controls and prevent future compliance issues and audit findings.”

- The project personnel will use this feedback to make improvements in subsequent years to inform the subgrant revisions, applicability of TA, need for additional TA, program delivery, internal controls, and the effectiveness and management of the SCQCS CSP program (e78).
- Feedback activities are also noted and align with the Management Plan timeline and milestones (e73-76). Having had a prior CSP grant, the applicant noted that former subgrantee feedback lead to “additional TA support through informal phone conferences” (e78) as an example of utilizing immediate feedback.

Weaknesses:

There were no weaknesses.

Reader's Score: 3

3. (3) 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 applicant provided a detailed description on the time commitments of the project director (Project Manager), Grant Manager, and other key personnel including the percentage of time each staff member plans to spend on the project. This is evidenced as follows and in the Appendix: Budget Narrative.

- Grant Manager is 1.0 FTE: will coordinate day-to-day grant and sub-grant activities and subgrant application process, provide TA to subgrantees, coordinate monitoring collaborates with partners, and develop year-end reports and evaluations, etc. (e79).
- CSDM position at 1 FTE (housed at the Public Charter School Alliance of South Carolina (PCSASC), the state’s only charter support organization): will work directly with charter interest groups during their charter school application development phase and throughout their initial year of planning as they prepare to open the school; and assist chartering groups with developing and executing high-quality charter school applications that ultimately receive approval by an authorizer with additional emphasis on those applications that utilize diverse models of

Sub

learning and establish charter schools in rural communities as well as those that serve high school students (Appendix B: Resumes/Job Description, e93).

- Because the SCQCS is housed in the SCDE, there are also several in-kind positions that will assist in the grant project. These positions are as follows (e79-80).
 - o Project Manager (Project Director) at .30 in-kind FTE: does work related to the law, proving TA sessions to authorizers, helps with the collection and dissemination of charter school best practices, and develops relationships and communication with external partners (e79).
 - o OST Program Coordinator: prepares reports, works on logistical coordination, contracts, etc.
 - o OST Assistant Director at .15 FTE in-kind: provides high level oversight of the CSP grant (e80).

The time dedicated to the project is appropriate and adequate to meet the goals and objectives of the grant on time and within budget.

Weaknesses:

There were no weaknesses.

Reader's Score: 2

Priority Questions

Competitive Preference Priority - Competitive Preference Priority 3

1. CPP3 Competitive Preference Priority 3: Equitable Financing

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:

In South Carolina, charter schools receive comparable base per pupil funding because “funding levels vary from one authorizer to another” (e22). Because charter schools are not considered LEAs, the authorizer LEA distributes all state, local and federal funding to the charter (e23-24).

The chart on page e22 demonstrates the variation in the type and amount of financing available to charter schools. The state has also instituted processes to verify and ensure that charter schools receive their funds in a timely manner and that they are consulted in the LEA 's preparation of the federal formula grants application (e24).

The South Carolina Department of Education (SCDE) described how the State ensures that charter schools receive comparable financing in comparison to traditional public schools in a prompt manner. This is evidenced by having the charter school principal verify in writing that they were consulted regarding the title categorical and IDEA federal applications. In addition, the SCDE verifies federal fund source allocations prior to allocation (e23-24).

Weaknesses:

While charter schools authorized by the SCPCSD and the Charter Institute at Erskine (CEI), the states only institution of higher education authorizer, receive more funds than charters authorized by districts, they do not have access to local bond initiatives. Therefore, they must use a portion of their per pupil funding to fund their facilities (e23).

Reader's Score: 2

Competitive Preference Priority - Competitive Preference Priority 4

1. CPP4 Competitive Preference Priority 4: Charter School Facilities

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:

South Carolina is actively working to provide charter schools with facilities access as evidenced with the methods noted below (e24-26).

- a) Funding for facilities comes from the Charter School Facility Revolving Loan program (CSFRLP), which provides low interest loans from [REDACTED] (e224-5).
- b) Technical assistance with facilities acquisition is in the form of training sessions at the annual conference (e25).
- c) Access to public facilities and the right of first refusal to purchase public school buildings: Per law, charter schools are given the right of first refusal and “the same or better terms and conditions” (e26).
- d) The ability to share in bonds or mill levies is allowable for charter schools with and LEA as the authorizer (e26).
- e) Low- or no-cost leasing privileges are demonstrated with charter school exemption from state and local taxation on earnings and property – except for sales tax (e26).

Weaknesses:

There were no weaknesses.

Reader's Score: 4

Competitive Preference Priority - Competitive Preference Priority 5

1. CPP5 Competitive Preference Priority 5: Best Practices to Improve Struggling Schools and Local Educational Agencies

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:

Because South Carolina's Charter school program is housed in the SCDE Office of School Transformation (OST) the applicant can easily leverage data and successful charter school best practices. As such, the sharing of charter school best practices becomes practice for the OST (e27).

The applicant has demonstrated that the State DOE is sharing and implementing best practices to help improve struggling schools, both charter and traditional public, and local education agencies via the state school improvement program, which is showcased via AdvanceEd, the state Office of Personalized Learning and TransformSC, Communities of Practice (COP), conference sessions and informal “models of transformation”(e27-28).

The specific SCDE examples demonstrate how the applicant is disseminating best practices throughout all schools in the State.

Weaknesses:

There were no weaknesses.

Reader's Score: 2

Competitive Preference Priority - Competitive Preference Priority 6

1. CPP6 Competitive Preference Priority 6: Serving At-Risk Students

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 applicant has ably demonstrated how the SCDE specifically supports charters schools serving at risk students and how it also provides access to the same statewide programs for all at-risk students (PBIS, MTSS and Read to Succeed Act program (e30)).

The SCDE comprehensively demonstrated specific support of charter schools that serve at-risk students through activities such as dropout prevention, dropout recovery, or comprehensive career counseling services. This is evidenced in the "specific theme" charter schools (i.e. middle colleges, a vocational college for motorsports, virtual charter schools for "students who are over-aged and under-credentialed", charter schools located on group home campuses and some with curriculum and instructional models specific to students with dyslexia e28-29).

Several CSDE offices provide charter schools resources, technical assistance, and support (i.e. PBIS, Read to Succeed Act Programs, the Multi-Tiered System of Supports) ensuring equitable access to meet the needs of at-risk student (e30).

Weaknesses:

There were no weaknesses.

Reader's Score: 3

Competitive Preference Priority - Competitive Preference Priority 7

1. CPP7 Competitive Preference Priority 7: Best Practices for Charter School Authorizing

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 SCDE clearly demonstrates that it has taken steps to ensure that all authorized public chartering agencies implement best practices for charter school authorizing. This is evidenced in the 2019 third-party day-long technical assistance session on federal compliance for the two statewide authorizers and their "entire portfolio of schools," who needed additional support and guidance regarding EDGAR (Education Department General Administration regulations (e31)).

This is also evidenced in the SCDE's past CSP grant objective to develop a set of standards and principles for quality authorizing specific to "the SC statutes and regulations" (e31) and the current proposal to refine that work and provide

updated guidance to new schools.

For this current grant, the SCDE proposes to develop a “broad template for a performance framework” (e32). Charter school performance frameworks are considered authorizer best practice across the country and would vastly improve a charter authorizer’s ability to evaluate their charter schools in a consistent and transparent manner as well as provide measurable impact for each school and the sector at large.

While the applicant does not have “statutory or regulatory authority” over charter authorizers, it can hold LEA authorizers accountable just as it would hold any other LEA accountable (e30) on IDEA and other state and federal laws regarding non-discrimination, access, equity, etc.

While the SCDE cannot ensure that all authorized public chartering agencies will implement best practices, it can offer and encourage the implementation of “industry best practices” (e33) and continue its collaborative efforts to build capacity in all SC charter authorizers. As such, they have demonstrated the extent to which they will do this, within their limitations.

Weaknesses:

There were no weaknesses.

Reader's Score: **4**

Status: Submitted
Last Updated: 06/26/2020 01:03 PM

Status: Submitted

Last Updated: 06/26/2020 09:40 AM

Technical Review Coversheet

Applicant: South Carolina Department of Education (S282A200022)

Reader #3: *****

	Points Possible	Points Scored
Questions		
Selection Criteria		
Quality of Project Design		
1. Project Design	35	31
Quality of Eligible Subgrant Applicants		
1. Subgrant Applicants	15	13
State Plan		
1. State Plan	35	31
Quality of the Management Plan		
1. Management Plan	15	13
Sub Total	100	88
Priority Questions		
Competitive Preference Priority		
Competitive Preference Priority 3		
1. CPP3	3	3
Competitive Preference Priority 4		
1. CPP4	4	4
Competitive Preference Priority 5		
1. CPP5	2	2
Competitive Preference Priority 6		
1. CPP6	3	3
Competitive Preference Priority 7		
1. CPP7	4	4
Sub Total	16	16
Total	116	104

Technical Review Form

Panel #11 - CSP State Entities - 7: 84.282A

Reader #3: *****

Applicant: South Carolina Department of Education (S282A200022)

Questions

Selection Criteria - Quality of Project Design

1. a. Quality of Project Design

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: 31

Sub

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

Strengths:

The application proposal demonstrates a relevant rationale that specifies outcomes over time in promoting state-level strategies. The applicant presents an education profile of a graduate conceptual framework that builds upon key partnerships, industry knowledge and best practice for improving student academic achievement and attainment on the goal for success in college careers, and citizenship attainment of educationally disadvantaged students. For example, the applicant identifies school quality factors in developing charter school leaders through continuous improvement science and school turnaround with educationally disadvantaged students. The applicant presents credible research studies of resources and models on quality school improvement process, data-driven decision making, and school turnaround capacity-building as an education strategy of high performance charter schools (e33-e36).

Weaknesses:

The application proposal would be strengthened with a detailed description to show how the applicant addresses required priorities, without ongoing expansion of charter schools, to likely realize relevant outcomes (e36-e37).

Reader's Score: 14

2. (2) The extent to which the methods of evaluation include the use of objective performance measures that are clearly related to the intended outcomes of the project and will produce quantitative and qualitative data to the extent possible; and

Strengths:

The application provides relevant methods of evaluation that are timely for the proposed project. The application proposal demonstrates objective performance measures related to the intended outcomes and benchmarks of the proposed project. The application proposal presents qualitative data using surveys to reflect community perceptions on charter school promotional projects, resources and supports. Quantitatively, the applicant documents school and

Sub

student performance data such as student growth, achievement, and enrollment. Additionally, the applicant provides an external evaluator to ensure the implementation of annual objective performance measures (e43-e50).

Weaknesses:

The application would benefit from detailed information on performance measure 1b to make determination of clear objective performance measure that are clearly related to the intended outcomes (e44).

Reader's Score: 14

3. (3) The ambitiousness of the State entity’s objectives for the quality charter school program carried out under the CSP State Entities program

Strengths:

The applicant presents attainable objectives for state-wide support to quality charter programs serving underserved communities. The applicant provides a clear rationale with objectives tied to the project. The applicant describes an application process that requires objectives linked to a state accountability system, biannual charter development, and showcase conferences that likely result in improved student achievement (e44-e47).

Weaknesses:

The application proposal would be strengthened with details on baseline data of charter growth data, enrollment records, student achievement, and high school graduation rates to justify clear magnitude of ambitious. The applicant would benefit from measurable objectives 3 a. b. c. to increase community engagement awareness and perceptions of high-quality charter schools (e44-e47).

Reader's Score: 3

Selection Criteria - Quality of Eligible Subgrant Applicants

1. b. Quality of Eligible Subgrant Applicants

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

Strengths:

The applicant proposes adequate likelihood of eligible subgrant meeting those objectives. The applicant incorporates a rigorous application process to extend the statewide high-quality charter schools strategies. The applicant strengthens charter schools support for eligible subgrant applicants to implement rigorous academic standards, diverse charter school models, and engagement of diverse stakeholders. For example, the applicant presents charter school program planning and implementation project for funding, publicity, engagement, and sustainability in opportunity regions. Additionally, the applicant provides quality choices to under-resourced communities and low performing schools. Finally, the application proposal demonstrates a robust indicator to utilize high quality charter schools as a strategy to improving low performing schools (e50-e55).

Weaknesses:

The application proposal could be strengthened with a detailed description of how the subgrant process will directly support sufficient rural communities to ensure educational results for student outcomes (e51).

Reader's Score: 13

Selection Criteria - State Plan

1. c. State Plan

The State entity's plan to--

Reader's Score: 31

Sub

1. (1) Adequately monitor the eligible applicants receiving subgrants under the State entity's program;

Strengths:

The applicant presents diverse monitoring processes to evaluate eligible applicants. The application proposal includes an annual review process to evaluate progress toward meeting performance goals. The applicant also focuses on targeted assistance and financial options to further develop quality charter school programs. For example, the applicant presents a multi-tiered competitive process that includes peer reviewer protocols for the proposed project. Additionally, the applicant's monitoring plan ensures equity of appropriate services and effective administration for quality charter schools to mitigate risk. The applicant promotes charter school operators autonomy to provide a diverse charter school model concept (e55-e58).

Weaknesses:

The application proposal would be stronger with clearer specificity of a monitoring timeline of how deficiencies will be addressed by the subgrantee. The application proposal would also be strengthened with a clearer description of the applicant's monitoring process to ensure subgrantee use of funds help meet the diverse needs of students with disabilities and English learners (e55-e58, e66).

Reader's Score: 8

2. (2) Work with the authorized public chartering agencies involved to avoid duplication of work for the charter schools and authorized public chartering agencies;

Strengths:

The applicant presents a detailed plan for the charter schools and authorized public chartering agencies to avoid duplication of work. The applicant provides clear state charter school application guidelines and an electronic grants management system to automate and streamline critical processes and requirements of charter schools and authorized public chartering agencies. The application proposal demonstrates a consistent process to avoid duplication across both applications and reduce eligible applicants' workload when compiling resources, information, and content. The applicant consolidates significant and confidential information such as school data and performance. For example, the applicant presents a grant application section for authorizers to request additional information to consolidate information and compile resources for annual reporting and statement of assurances (e58-e59).

Sub

Weaknesses:

No weaknesses noted.

Reader's Score: 5

3. (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 applicant provides a comprehensive plan of clearly established technical assistance and authorizing efforts for eligible subgrant applicants to open and operate charter schools across the state. The application proposal demonstrates state office of transformation technical assistance to work specifically with eligible subgrant applicant in low-performing charter schools. The application proposal demonstrates statewide technical assistance on shifting standards and accountability systems with a lottery selection process to ensure enrollment of racially and ethnically diverse student population. Additionally, the applicant provides sound guidance on strategic planning, organizational development, and evaluative monitoring for experienced and new charter authorizing entities to increase innovation. For example, the applicant provides charter authorizer with an evaluative rubric and financial accountability considerations to make determinations on how well a charter school program serves and attracts a representative student body (e59-e67).

Weaknesses:

The application proposal would be stronger with a detailed state timeline for clearly established targeted support of quality authorizing efforts for all authorized chartering agencies across the State (e66-e67).

Reader's Score: 9

4. (4) 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; and

Strengths:

The applicant presents a reasonable plan of working with collaborative partners in soliciting and considering input from parents and community members. The applicant describes input collection methods through traditional and innovative methods. For example, the applicant presents varied methods such as an online stakeholder perception platform, surveys, stakeholder meetings, and collaboration meetings on the implementation and operations of charter schools throughout the State. The applicant explains the process of data collection and data usage to make determinations on future technical assistance sessions, dissemination, and communications. Additionally, the applicant provides additional support of a charter school program manager to assist in all charter school communications (e67-e70).

Weaknesses:

The application proposal would be stronger with a thorough description of specific timeline to engage parents and community members on implementation, operations and follow-up communication of charter schools in the State (p. e68).

Sub

Reader's Score: 4

5. (5) 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 applicant presents a clear plan to maximize flexibility to support charter schools. The applicant addresses flexibility of inclusion with state funding and federal formula grant applications. For example, the applicant provides flexibility of federal funds in areas such as academic proficiency, financial performance, and sustainability for compliance. The applicant presents annually funding guidelines between the charter and its authorizer for federal formula education grants. Additionally, the applicant describes flexibility in funding charter school facilities. The applicant proposes access to charter schools to explore a facility revolving loan program and public school unused facility space (e70-e72).

Weaknesses:

No weaknesses noted.

Reader's Score: 5

Selection Criteria - Quality of the Management Plan

1. d. Quality of the Management Plan

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

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; and

Strengths:

The applicant presents an attainable management plan with measurable objectives, implementation activities, qualified personnel, milestones, and specific timeline for accomplishing project tasks over grant period. The application proposal includes a management plan with an aligned budget and resources for project tasks. For example, the applicant aligns the plan with grant policy and grant programs accounting procedures for internal accountability of compliance in operations. Additionally, the plan adheres to state and federal requirements and provisions to ensure appropriate implementation of project tasks. The applicant also specifies the management plan is within the budget. In addition, the applicant provides detailed resumes of key leadership personnel and school-level staff that highlight relevant charter school qualifications, experience, and training that align with project objectives (e72-e81).

Weaknesses:

The application proposal could be strengthened with a detailed description of how the project manager implements coordinated work of external partner, external evaluator and contracted agency entities. The application proposal would be stronger with a clear description of how proposed essential authorizing practices will be implemented to ensure consistency with performance framework (e77, e81).

Reader's Score: 8

2. (2) The adequacy of procedures for ensuring feedback and continuous improvement in the operation of the proposed project

Strengths:

The applicant demonstrates adequate procedures for ensuring feedback and continuous improvement in operations. The applicant presents greater assurance to collect documented feedback for operational continuous improvement of the proposed project. For example, the applicant specifies feedback mechanisms such as technical assistance surveys, subgrantee feedback, and a formal external review process. The applicant presents ongoing feedback templates to inform internal controls for auditing compliance. Additionally, the applicant provides an annual process of quarterly evaluation monitoring from an external evaluator. The applicant provides clear process of using feedback and continuous improvement for efficient and quality operations to inform ongoing technical assistance and supports (e77- e78).

Weaknesses:

No weaknesses noted.

Reader's Score: 3

3. (3) 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 applicant presents some information on time commitments of key personnel. For example, the charter school program grant manager commits to 100% FTE for the coordination of the day-to-day subgrant activities, management of the application process, training and technical assistance to subgrantees, collaboration with charter stakeholders in planning and monitoring of target objectives of the proposed project. The application presents time allocation of contributing project personnel to justify adequate coverage to accomplish the project tasks (p. e79- e80).

Weaknesses:

No weaknesses noted.

Reader's Score: 2

Priority Questions

Competitive Preference Priority - Competitive Preference Priority 3

1. CPP3 Competitive Preference Priority 3: Equitable Financing

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 applicant addresses equitable financing in comparison to traditional public schools. The applicant requires a per pupil funding matrix as a significant factor for eligible charter schools. The applicant describes the state office school transformation guidelines to support charter schools and authorizer decisions with federal formula education grants such as Title I and IDEA. For example, the applicant provides clear communications to an authorizer for the timely distribution of allocated charter school federal funds based on attendance of underserved students in the charter school. The applicant also provides guidelines for an authorizer to supply federal or state categorical aid funds within a ten business day timeframe to qualifying charter schools (e22-e24).

Weaknesses:

No weaknesses noted.

Reader's Score: 3

Competitive Preference Priority - Competitive Preference Priority 4

1. CPP4 Competitive Preference Priority 4: Charter School Facilities

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:

The applicant addresses the significance of the charter school facility revolving loan program for facilities funding. For example, the applicant provides charter schools access to low-interest loans to secure appropriate facilities to sustain high quality operations for students and their families. The applicant promotes annual charter school conferences and meetings with targeted breakout sessions facilitated by charter school finance companies, developers, state fiscal agencies, and the state office of school facilities. In addition, the applicant provides targeted assistance to charter schools in navigating opening, planning, implementing, and expanding options with new and existing school facilities, land acquisition, and location selection (e24-e26).

Weaknesses:

No weaknesses noted.

Reader's Score: 4

Competitive Preference Priority - Competitive Preference Priority 5

1. CPP5 Competitive Preference Priority 5: Best Practices to Improve Struggling Schools and Local Educational Agencies

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:

The applicant presents best practices to improve struggling schools and local education agencies support with allocated additional state and federal funding in the same manner as non-charter schools. The applicant introduces targeted support and improvement for ESSA designated charter schools. The application proposal demonstrates the use of best practices for specific needs of the charter school based on a third-party diagnostic review and improvement priorities. For example, the application proposal provides statewide best practices cycle of school improvement priorities such as planning and evaluation, additional funding, transformation coaches. Additionally, the applicant supports assigned charter schools with school leadership capacity building and strategic planning to yield high impact in instructional, operational, and leadership capacities (e26-e27).

Weaknesses:

No weaknesses noted.

Reader's Score: 2

Competitive Preference Priority - Competitive Preference Priority 6

1. CPP6 Competitive Preference Priority 6: Serving At-Risk Students

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 applicant addresses competitive preference priority of serving at-risk students by establishing middle colleges that allow students to graduate from high school with a head start on their post-secondary curriculum. For example, the applicant presents post-secondary curriculum focus on high school health professions hands-on learning and experiential-based health system opportunities. In addition, the applicant serves all at-risk students that are enrolled in charter schools with services such as statewide programs, including Positive Behavioral Interventions and Supports, the state's Read to Succeed Act programs, the Multi-Tiered System of Supports, and many other initiatives that support educationally disadvantaged students and work to eliminate gaps in achievement. These at-risk student success supports and initiatives are provided by the State offices of Early Learning & Literacy, Career & Technology Education, Student Intervention Services, Family & Community Engagement, and Special Education Services. These initiatives and offices equip charter schools with resources, supports, TA, and one-on-one guidance to best serve and meet the needs of at-risk student populations (p. e28-e30).

Weaknesses:

No weaknesses noted.

Reader's Score: 3

Competitive Preference Priority - Competitive Preference Priority 7

1. CPP7 Competitive Preference Priority 7: Best Practices for Charter School Authorizing

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 applicant proposes developing best practices standards and principles for quality authorizing efforts. The applicant specifies operational structures and the state's overall charter school landscape. The applicant describes the convening of collaborative work groups of statewide and local charter school authorizers, school leaders, and other key stakeholders to inform best practices for quality charter school authorizing are implemented. Moreover, the application proposal demonstrates the relevance of continuously refining principles, standards, and best practices for an ever-changing landscape of charter schools context. For example, the applicant provides targeted focus on professional learning and technical assistance sessions to address current topics, trends, and specific needs (e30-e33).

Weaknesses:

No weaknesses noted.

Reader's Score: 4

Status: Submitted

Last Updated: 06/26/2020 09:40 AM

Technical Review Form

Reader: CSP Staff

Applicant: South Carolina Department of Education (S282A200022)

Total CPP1 and CPP2 Score

6

Competitive Preference Priority 1: Spurring Investment in Qualified Opportunity Zones

Under this priority, an applicant must demonstrate that the area in which the applicant proposes to provide services overlaps with a Qualified Opportunity Zone, as designated by the Secretary of the Treasury under section 1400z-1 of the Internal Revenue Code (IRC). An applicant must--

- a) **Provide the census tract number of the Qualified Opportunity Zone(s) in which it proposes to provide services; and**
- b) **Describe how the applicant will provide services in the Qualified Opportunity Zone(s).**

Note: In responding to this priority, an applicant is encouraged to explain how it will encourage prospective subgrantees to open, replicate, or expand one or more charter schools in a Qualified Opportunity Zone and how that might align to the application requirement response for (I)(C)(i).

Strengths:

a. Appendix F (p.e102-104) lists all of the Qualified Opportunity Zones and census tracts in South Carolina. This appendix is referenced in the response to Competitive Preference Priority 1. (p.e20)

b. The applicant will help foster a new Institute of Higher Education authorizer; provide incentives for new charter schools in all the Opportunity Zones of the state; and offer targeted support for charters schools in all the Opportunity Zones. (p.e20)

Weaknesses:

No weaknesses noted.

Reader's Score: 4

Competitive Preference Priority 2: One Authorized Public Chartering Agency Other than a LEA, or an Appeals Process

To meet this priority, the applicant must demonstrate that the State--

- a) Provides for one authorized public chartering agency that is not an LEA, such as a State chartering board, for each individual or entity seeking to operate a charter school pursuant to State law; or
- b) In the case of a State in which LEAs are the only authorized public chartering agencies, allows for an appeals process for the denial of an application for a charter school.

Note: In order to meet this priority under paragraph (b) above, the entity hearing appeal must have the authority to approve the charter application over the objections of the LEA.

Strengths:

- a. "By SC law, a charter school authorizer is considered an LEA, only LEAs can authorize charters, and a charter school operates as a public school within its LEA." (p.e21)
- b. A charter applicant may appeal directly to the state's Administrative Law Court (ALC) if an authorizer denies their charter school application. At a hearing, the ALC determines whether to overturn the authorizer's decision and grant a charter for the proposed school or to uphold the authorizer's decision to deny the application. The applicant provides a flowchart of the application and appeals process in Appendix F. (p.e22)

Weaknesses:

No weaknesses noted.

Reader's Score: 2