

Public Comment/Feedback on the Draft Documents for the 2024-2025 Sponsor Evaluation - Quality Practices

Sent by	Quality Section	Quality Practices Comments
<p align="center">Jim Smith Community School Coordinator , Mid-Ohio ESC</p>	Instructions/Glossary of Definitions	No comments/feedback provided
	Section A: Commitment and Capacity	A05. In the Guidance on Document Submission for the 2024-2025 Sponsor Quality Practices Review, please include as an example of relevant documents, a copy of the treasurer's license. I lost two points on the last evaluation even though I had uploaded the treasurer's resume along with her Annual Certification as to Sponsor Roles and Responsibilities that indicated she had been a treasurer for "said" number of years.
	Section B: Application Process and Decision-Making	B.04 - It states (under 3 points) that the Application reviewers have expertise in all four of the listed areas of school planning and operations: Education plan; Governance; Finance; Accountability. It is unclear as to whether each reviewer on the sponsorship team has to possess all four areas of expertise. Please be more clear/concise.
	Section C: Performance Contracting	No comments/feedback provided
	Section D: Oversight and Evaluation	No comments/feedback provided
	Section E: Termination and Renewal Decision-Making	E.06 - Under 4 points should the rubric include the following. The sponsor submitted evidence it requires each reviewer to individually score and document the rating for each renewal criteria AND THE HIGH STAKES REVIEW RESULTS. The high stakes review is listed separately from the renewal criteria under 2 and 3 points. It is unclear if the high stakes review should be individually scored under 4 points along with the other criteria items that are included in the renewal protocols.
	Section F: Technical Assistance	No comments/feedback provided
	Other Comments	No comments/feedback provided
	What other suggestions do you have to improve the sponsor evaluation process?	No comments/feedback provided

Public Comment/Feedback on the Draft Documents for the 2024-2025 Sponsor Evaluation - Quality Practices

Sent by	Quality Section	Quality Practices Comments
<p align="center">Tammie Osler General Counsel, Charter School Specialists</p>	<p align="center">Instructions/Glossary of Definitions</p>	<p>5. Include explanatory memos with larger documents. Comment: Many documents are more than 25 pages. A memo adds additional time to the submission of the documents. Highlighting the relevant information in the document should be sufficient.</p> <p>7. If a narrative explanation is needed, sponsors must use the narrative form provided by the Department. Comment: It is unclear in this section how narratives will be used. It should be clear that if a narrative is submitted, the reviewer should use it to assist in reviewing the documents. Not that the reviewer "may" use the narrative.</p> <p>Business Plan. Comment: Please further define "a formal statement of business goals." The business goals of all schools are to educate students according to the mission and vision of the school.</p> <p>Planning Stage. Comment: The planning stage should include the application period as many applicants begin planning even before the application is submitted. Additionally, the planning stage should be shorter for replicator schools as these operators have experience opening schools.</p>
	<p align="center">Section A: Commitment and Capacity</p>	<p>A.01 Comments: 1) Define sponsoring practices. Different reviewers may define it inconsistently. In the alternative, use sponsoring priorities or sponsoring responsibilities that are already defined in the glossary of definitions. 2) The word clear is used in the key indicators but not in the point boxes. Wording in the key indicators and point boxes should remain consistent to provide clarity for sponsors and reviewers. 3) Change the requirement of having a strategic plan in place by January 1 to having it in place by July 1. The review year is from July 1 - June 30.</p> <p>A.02 Comments: 1) The use of the wording "strategic actions" is problematic and increases the subjectivity of the evaluation. If the reviewer does not see the self-evaluation process as "strategic", the whole process could be discounted. Strategic should be removed as each sponsor should be permitted to implement its own actions. 2) All requirements of the evaluation should start on July 1. 3) Sponsoring obligations should be defined. Different reviewers may define it inconsistently. In the alternative, use sponsoring priorities or sponsoring responsibilities that are already defined in the glossary of definitions. 4) Provide examples of what evidence would be needed to show development and implementation of action steps.</p>

Public Comment/Feedback on the Draft Documents for the 2024-2025 Sponsor Evaluation - Quality Practices

Sent by	Quality Section	Quality Practices Comments
<p align="center">Tammie Osler General Counsel, Charter School Specialists</p>	<p align="center">Section A: Commitment and Capacity</p>	<p>A.03 Comments: 1) This should not be an additional requirement as the contract and statutes adequately define the roles and responsibilities of the sponsor and school. 2) This indicator adds a new compliance requirement not evidenced in OAC or ORC. The Department should not be permitted to add new sponsor compliance requirements outside of what is already included in rule and law. 3) Provide a definition of "complement". This is a vague word that is too subjective to be included in an evaluation.</p> <p>A.04 Comments: Remove the requirement to sign a conflict of interest statement "once they begin those sponsoring responsibilities". Make the requirement that all sponsor staff sign a conflict of interest statement by September 30 of every year.</p> <p>A.05 Comments: 1) Why must sponsoring responsibilities be designated to specific staff? It should be sufficient to delegate sponsoring responsibilities to specific departments within an organization. 2) Provide a clear definition of expertise. 3) The guidance document indicates resumes should clearly indicate sponsor staff's relevant responsibilities. Define clearly as this could be subjective to each reviewer. A definition of clearly will guide sponsors on how much information should be presented with the resume.</p> <p>A.06 Comments: 1) Provide examples of how sponsors should show evidence of alignment to professional development to sponsoring responsibilities. Are reviewers specifically trained on what this alignment is? Will reviewers be examining the subject matter of each professional development submitted to show alignment? 2) Define regularly as this could be subjective to each reviewer.</p> <p>A.07 Comments: 1) Each sponsor submits a yearly sponsor expenditure report to the Department in August. This requirement is covered by submission of the sponsor expenditure report. Any additional requirements, ie: budget narrative, are outside the scope of the law and should not be included. Additionally, the answer to the appropriate allocation of funds should be based on performance. In other words, outputs should be used to determine if "input" (funds) are achieving the desired results. It will be clear through an assessment of the professional development, technical assistance, interventions and attendance at board meetings exactly how a sponsor is allocating resources. 2) Providing a sponsor budget with detailed line items indicating revenues and expenditures could involve a sponsor releasing proprietary information. This should not be required. 3) What evidence should be provided that sponsor's fees do not create a potential conflict of interest? It is difficult to prove a negative. 4) Define sufficient funds.</p>

Public Comment/Feedback on the Draft Documents for the 2024-2025 Sponsor Evaluation - Quality Practices

Sent by	Quality Section	Quality Practices Comments
<p align="center">Tammie Osler General Counsel, Charter School Specialists</p>	<p align="center">Section B: Application Process and Decision-Making</p>	<p>B.01 Comments: 1) The planning stage for the school should not be included as a requirement and is not relevant to the application process. Many schools applying for sponsorship have spent time planning prior to completing the application. 2) In the alternative, change the definition of planning stage to begin when the application period opens or when the application is submitted rather than when the application is approved. 3) Allow for a different planning stage for replicator applications as these operators have experience opening schools. 4) Define exactly what needs to be publicly available on the organization's website.</p> <p>B.02 Comments: 1) Capacity to execute the plan is evidenced throughout the entire application. This is something determined by the sponsor as part of the application review and should not be a required separate section of the application. 2) Explain "documents that sufficiently corroborate these plans." Is the Department looking for evidence that sponsors ask for documents that "corroborate the plan" proposed by the applicant in the application?</p> <p>B.03 Comments: 1) This section should provide for a points deduction for sponsors who accept schools after the statutory December 31 deadline and the school did not provide proper notification to its current sponsor. 2) This section should deduct points for sponsors accepting schools that are changing sponsors to avoid intervention or corrective action (see standard E.02). 3) The requirement to interview the current sponsor of the applicant should only apply if the existing/transfer school is operated by a management company with no prior relationship with the new sponsor.</p> <p>B.04 Comment: More clearly define "expertise in the areas of" and "area of specialization".</p> <p>B.05 Comments: 1) The rubric requires "each reviewer to individually score and document the rating for each selection criteria" - this should be changed to allow for individual reviewers to document the rating for each selection criteria to which they are assigned. Reviewers with educational backgrounds and expertise review educational plans, mission, vision, and staffing plans. While different reviewers will review the finance/budget and governance sections. 2) Sponsors should not be required to provide a "cut score". Sponsors should have the autonomy to evaluate and score the applications without restrictions.</p> <p>B.06 Comments: 1) This criteria requires each completed application, scoring documents and completed rubrics for all applications. We receive between 8-12 applications per year which makes submission of these documents cumbersome and thousands of pages. The standard should be revised to allow for upload of a sample of applications or at least downsized to only include the scoring documents. 2) 75% is not an adequate measure as all sponsors have different applications. The 75% requirement is completely arbitrary and does not allow sponsor autonomy in applications and scoring processes.</p>

Public Comment/Feedback on the Draft Documents for the 2024-2025 Sponsor Evaluation - Quality Practices

Sent by	Quality Section	Quality Practices Comments
<p align="center">Tammie Osler General Counsel, Charter School Specialists</p>	<p align="center">Section C: Performance Contracting</p>	<p>C.01 Comments: 1) This section clearly violates the autonomy of sponsors by requiring all sponsor contracts to mirror each other. Sponsors are not permitted to draft their own student performance measures, rather will be forced to use the criteria approved by the Department. 2) This criteria requires annual metrics and targets. Clarify if this means the performance framework has to be evaluated each year or that it should include 1 year metrics and targets for the length of the contract.</p> <p>C.02 Comments: 1) The requirement of a high stakes review every five years is unnecessary. One high stakes review at the time of renewal is sufficient, especially taking into account section D.07. In D.07, the school is notified annually of its progress toward meeting the high stakes review goals upon renewal. 2) This criteria should not include anything beyond what is required in rule and law regarding renewal. The sponsor evaluation is an evaluation of the sponsor's adherence to rule and law and should not subject sponsors to additional requirements.</p>
	<p align="center">Section D: Oversight and Evaluation</p>	<p>D.02 Comment: Budget ledgers and transaction detail reports should not be required in financial reviews. We consulted a community school treasurer who provides services to over 30 community schools in Ohio. He stated, "I could understand the request a little more if the school was having financial difficulties, not paying vendors on time, having material weaknesses/findings in audits, etc, but aside from those types of circumstances, I'm not sure what could be gleaned from reviewing transactional detail on a monthly basis that you can't get from the current financial package. To provide this would result in us having to submit over 400 additional reports annually." Based on his information, the standard could require these documents only if the school was having financial difficulties as listed above.</p> <p>D.03 Comments: 1) It is unnecessary and outside of statutory confines to require visits to be in the first half and second half of the year. This is sometimes difficult as the "first half" of the year is typically slightly shorter in number of days and some visits may need to be re-scheduled because of weather/calamity days. Additionally, visits done in the "second half" of they year must be completed and documentation done by April 30th for a May 15th upload. 2) The requirement to connect with stakeholders should be reduced to 2 stakeholders. Some schools have students that are too young to contact - ie: smaller K-1 or K-2 schools. Also, it is disruptive to a child's school to be interviewed by an outsider to the school. Additionally, parents are often not present during school visits or may not be interested in spending time being interviewed by the sponsor. Site visits should not be disruptive to a school day - but used to observe the school in action and evaluate how the school is operating.</p>

Public Comment/Feedback on the Draft Documents for the 2024-2025 Sponsor Evaluation - Quality Practices

Sent by	Quality Section	Quality Practices Comments
<p align="center">Tammie Osler General Counsel, Charter School Specialists</p>	<p align="center">Section D: Oversight and Evaluation</p>	<p>D.04 Comments: 1) It is unnecessary and outside of statutory confines to require visits to be in the first half and second half of the year. This is sometimes difficult as the "first half" of the year is typically slightly shorter in number of days and some visits may need to be re-scheduled because of weather/calamity days. Additionally, visits done in the "second half" of they year must be completed and documentation done by April 30th for a May 15th upload. 2) The first half/second half requirement should only be assessed under one criteria - either D.03 or D.04. It is unfair to penalize sponsors under both sections for the same criteria. 3) The sponsor should not be required to provide specific steps or timeframes for the school's area of improvement. To allow for adequate autonomy in the schools, the school should be allowed to provide these specifics to sponsors.</p> <p>D.05 Comments: 1) This criteria is redundant and is covered in sections C.01, D.01, D.02, D.03, D.04, D.06, D.07 (to name a few). The way the standard is worded, the sponsor should provide all documentation from D.06 (Interventions), D.01 (compliance measures and organizational monitoring) and D.02 (financial reviews). 2) The guidance document states the sponsor's performance framework would not be applicable to this section. However, the performance framework is very relative to how and what data is collected on a yearly and multi-year basis. In fact, the key indicators mention using the performance framework.</p> <p>D.06 Comments: 1) Sponsors should not be required to upload contracts for schools. These contracts are provided to the Department and accessible on the Department's website. 2) Not every situation will have steps and timeframes for resolving the deficiency and not all deficiencies will need to have status updates requested and reviewed. Sponsors should have autonomy to handle interventions as necessary without being dictated what must be provided and collected.</p> <p>D.07 Comments: 1) These reports should not be required to state a school's prospects for renewal. A school may be in its first year of operation and renewal is several years away. At that point,</p>

Public Comment/Feedback on the Draft Documents for the 2024-2025 Sponsor Evaluation - Quality Practices

Sent by	Quality Section	Quality Practices Comments
<p align="center">Tammie Osler <i>General Counsel</i>, Charter School Specialists</p>	<p align="center">Section E: Termination and Renewal Decision-Making</p>	<p>E.01 Comment: A written application should not be required of renewal schools. Sponsors should base renewals on the school's performance which is assessed annually and over multiple years. Based on the criteria in D.07 - schools already know their performance.</p> <p>E.02 Comments: 1) A written application should not be required. Additionally, the inclusion of a written application should only be included in one section - either E.01 or E.02, not both, as a sponsor losing points in both sections would be unfair. 2) If a sponsor chooses to renew a school, it should not have to align this decision with national practices. Each state is different in how it assesses performance of schools and how charter schools are operated. 3) The school should not have to score a certain percentage. Sponsors should have autonomy to score schools and establish renewal criteria. This percentage has no basis in rule, law or national best practice.</p> <p>E.03 Comment: Sponsors should not be required to provide an explanation "beyond statutory language". The sponsor evaluation was developed to ensure sponsors are complying with rule and law, not add additional obligations beyond that.</p> <p>E.04 Comments: 1) Sponsors should not be required to provide a written policy that goes beyond the statutory language for closing (see comment E.03). 2) The guidance document states the contract is not acceptable as an upload, however, to receive 1 point in the section, the sponsor must show statutory language in contract for termination.</p> <p>E.05 Comments: 1) Sponsors should not be required to provide closure guidance beyond the Department's guidance. If the sponsor is following the guidance of the Department - this should be acceptable. 2) This standard requests information on schools closed before the review year. The reviewers should be provided this information from the Department and not require submission by the sponsor. 3) Define plan of action.</p> <p>E.06 Comments: 1) This standard requires each reviewer to individually score and document the rating for each renewal criteria. However, part of the renewal criteria that is required is the high stakes review. Reviewers should not be required to score the high stakes review as the scoring is not discretionary and is built in to the performance framework. 2) The high stakes review should not be required to be 67% of the contract renewal scoring. This is an arbitrary number with no basis in rule, law or national best practice.</p>

Public Comment/Feedback on the Draft Documents for the 2024-2025 Sponsor Evaluation - Quality Practices

Sent by	Quality Section	Quality Practices Comments
<p align="center">Tammie Osler <i>General Counsel</i>, Charter School Specialists</p>	<p align="center">Section F: Technical Assistance</p>	<p>F.01 Comment: Three instances of technical assistance should not be required. Often, schools are performing well and are not in need of three separate instances of technical assistance. Sponsors should have the autonomy to provide technical assistance as needed instead of providing a mandated amount.</p> <p>F.02 Comment: Sponsors should not be required to provide an annual training to assist schools in understanding changes in rule, law and policy that impact community school operations. Board members and school personnel are already required to attend annual open meetings and public records training. Requiring an additional training is cumbersome and burdensome to people who are already volunteering their time. Additionally, there is no guarantee anyone will attend the training.</p>
	<p align="center">Other Comments</p>	<p>1) The spaces in this survey were not adequate to include all comments. Sponsors should be permitted as much space as necessary to comment on all sections as this evaluation affects a sponsor's livelihood and benefits afforded by statute. See comments for sections A.07 and D.07 here.</p> <p>A.07 Comments: 4) Define sufficient funds. If it means the sponsor budget does not show a deficit for the budget, then the standard should be changed to state "Based upon the documents provided, the sponsor budget does not a show a deficit. 5) Provide examples of evidence that should be provided to show "data-driven decisions" from the needs assessment. 6) The Department has provided little to no guidance to inform sponsors or themselves about the requirements of this section.</p> <p>D.07 Comments: 1) These reports should not be required to state a school's prospects for renewal. A school may be in its first year of operation and renewal is several years away. At that point, there is no way to tell if the school is on track for renewal. Many things may change at the school over the course of the term of its contract that affect renewal. Opining on renewal may open sponsors to liability. 2) The report should not require areas for improvement. Some schools are performing well and do not need to provide areas for improvement.</p> <p>2) The upload time should be extended beyond May 15 as the school year is still in progress. Many schools are still in session until the end of May, sometimes early June. An upload of June 15 would be more appropriate.</p>
	<p>What other suggestions do you have to improve the sponsor evaluation process?</p>	<p>1) Implement more stakeholder feedback into the evaluation.</p>

Public Comment/Feedback on the Draft Documents for the 2024-2025 Sponsor Evaluation - Compliance

Sent by	Compliance Document Section	Compliance with All Applicable Laws and Rules Comments
<p align="center">Matt Rado <i>Executive Director ,</i> Cleveland Municipal SD</p>	Compliance Worksheet-Sponsor	N/A
	Compliance Worksheet-Oversight of Schools	The efficiency question in column K for item 126 is incorrect. It asks if the school is 9-12 but as noted in the compliance questions, 3365.04 is applicable to schools serving students in grades 6 and up.
	Other Comments/Feedback	No comments/feedback provided
	What other suggestions do you have to improve the sponsor evaluation process?	No comments/feedback provided
<p align="center">Brian Dunbar <i>Chief Operations Officer,</i> Charter School Specialists</p>	Compliance Worksheet-Sponsor	No comments/feedback provided
	Compliance Worksheet-Oversight of Schools	#667 Public Records and Open Meetings Training- The department should take the lead in updating the statutory references for this requirement as they create confusion because of conflicting statements within the referenced sections. One reference requires every board member to complete training every year while the other requires it every three years. One allows a designee to complete the training while the other doesn't. The laws needs clarity and the department should lead that effort so they can more clearly delineate the requirements for sponsors, schools, board members.
	Other Comments/Feedback	No comments/feedback provided
	What other suggestions do you have to improve the sponsor evaluation process?	No comments/feedback provided
<p align="center">Tammie Osler <i>General Counsel ,</i> Charter School Specialists</p>	Compliance Worksheet-Sponsor	No comments/feedback provided
	Compliance Worksheet-Oversight of Schools	Item #667 Comment: The Department should not require Attorney General approved training under this line item. The Auditor of State issued a bulletin in October 2021 stating the bulletin was "to provide the Auditor of State's interpretation that the annual public records and open meetings laws training for Community School officers and certain employees must be training that is certified by the Ohio Attorney General in accordance with Ohio Rev. Code § 109.43(B)." After the Auditor received additional information regarding the applicability of ORC 109.43(B) to community schools, it has updated its bulletin to indicate this requirement is put on hold until further notice.
	Other Comments/Feedback	No comments/feedback provided
	What other suggestions do you have to improve the sponsor evaluation process?	Allow for the upload of documentation with comments.

Public Comment/Feedback on the Draft Documents for the 2024-2025 Sponsor Evaluation - Technical Document

Sent by	Technical Document Section	Technical Document Comments
Tammie Osler <i>General Counsel</i> , Charter School Specialists	Overview	No comments/feedback provided.
	Academic Performance Component	1) Clarify when the Department will calculate the enrollment for each school. Will it be an average of the monthly enrollment? 2) When evaluating schools that do not receive a report card, include consultation with the Office of Exceptional Children.
	Compliance with Laws and Rules Component	No comments/feedback provided.
	Quality Practices Component	No comments/feedback provided.
	Review Period	No comments/feedback provided.
	Overall Rating	No comments/feedback provided.
	Other Comments - Technical Document	At the end of the document, it states "Before applying the two business rules, the initial overall rating is determined by the following summative score" - what are the two business rules? All business rules should be provided to sponsors for comment before implementing with the evaluation.
	General Comments - Sponsor Evaluation	No comments/feedback provided.
What other suggestions do you have to improve the sponsor evaluation process?	Implement stakeholder feedback.	