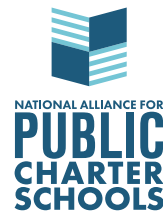# HOW TO ENGAGE WITH THE CHARTER SCHOOLS PROGRAM ADMINISTRATION IN YOUR STATE

A TOOLKIT FOR CHARTER SUPPORT ORGANIZATIONS

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NATIONAL ALLIANCE FOR PUBLIC CHARTER SCHOOLS

TABLE OF CONTENTS

INTRODUCTION

The National Alliance's 2020 CSP annual report explains the history of the federal Charter Schools Program (CSP) and its recent grantees. For general background on the program this is a good place to start. In partnership with Bellwether Education Partners, we have also produced a report that analyzes the impact of the CSP, *Clearing the Air: An Analysis of the Federal Charter Schools Program*. Our latest resource is this toolkit, which contains practical resources to introduce charter support organizations (CSOs) to the benefits and advantages that leading federal CSP activities can bring to their state. It provides a set of practical tools to assist CSOs as they seek further CSP involvement, including steps to apply for a statewide CSP project.

The toolkit includes the following resources and tools:

▶ Advantages of CSO engagement with and in CSP activities

▶ Timeline for developing a CSP state entities proposal

▶ Comprehensive program and budget design (using CSP budget and full-time equivalent (FTE) calculator tools)

▶ Subgrant awards calculator

▶ Five-year macro budget (includes obligation modeling)

▶ Budget narrative template

▶ Grants fiscal FTE calculator

▶ Project staff FTE calculator

▶ Creating a proposal to run a CSP grant previously administered by a State Education Agency (SEA)

▶ Federal monitoring for CSP grantees

This toolkit focuses on CSP grants to state entities (SE grants). The CSP State Entities Program enables state agencies, CSOs, governors, and state authorizers to award CSP subgrants to eligible applicants in their state. Subgrants can be used to open and prepare for operation of new, replicating, and expanding charter schools. Seven percent of the award must be used to provide technical assistance to charter schools and authorizers.

CSOs that have received a CSP State Entities award include:

▶ New Jersey Public Charter School Association (2020)

▶ Opportunity 180 (Nevada, 2020)

▶ Pennsylvania Coalition of Public Charter Schools (2020)

▶ Alabama Coalition for Public Charter Schools (2019), now known as New Schools for Alabama

▶ Arkansas Public School Resource Center (2018)

▶ Bluum, Inc. (Idaho, 2018)

▶ Mississippi Charter School Authorizer Board (2017)

▶ Oklahoma Public School Resource Center, Inc. (2017)

INTRODUCTION

Information on other CSP programs can be found on the U.S. Department Education's website. Other CSP grant programs include:

Grants to Charter School Developers for the Opening of New Charter Schools: These grants provide funds to eligible charter school developers to open new charter schools in locations where a CSP State Entities Program does not exist.

CSP Grants to Charter Management Organizations for the Replication and Expansion of High-Quality Schools Competition: These grants provide funds to eligible existing charter school organizations for the replication and expansion of high-performing charter schools.

Credit Enhancement for Charter School Facilities Program: This program provides grants to eligible entities to enhance the credit of charter schools, address the general lack of equitable access to taxpayer-funded facilities, and improve access to the funding streams available to school districts. These CSP projects help charter schools access private-sector and other non-federal capital to acquire, construct, and renovate facilities at a reasonable cost.

National Dissemination Grant Competition: This program provides grants to support the work of eligible entities to improve the charter school sector and increase the number of high-quality charter schools through the dissemination of best practices. These CSP awards support a variety of organizations in their work to support charter schools across the country.

About the Author

Gina Schlieman of GPS Strategies Group curated the tools and resources in this toolkit. Gina has been working with the federal CSP program since 2012, including four years managing Colorado's CSP program and assisting several states with CSP project development, application, and project implementation.

I. BENEFITS OF ENGAGING WITH AND IN CSP ACTIVITIES

The CSP is a collection of federal programs that support various aspects of the U.S. charter school sector, including several grant programs to support new, expanding, and replicating charter schools. These include grants to state entities, charter management organizations (CMOs), and direct grants to individual charter schools without access to a statewide program, as well as grants for facilities research, credit enhancement, and dissemination of best and promising practices from successful charter schools.

Why Engage with CSP?

a. Expand direct engagement with statewide CSP activities.

 i. Having the support of a CSO that the charter sector **trusts** enables a state CSP project to establish/maintain more legitimacy and impact.

 ii. With less bureaucracy, CSOs are **less constrained** in recruiting and contracting peer reviewers and can quickly identify and contract added team expertise to rapidly respond to emerging issues. CSOs administering part or all of a CSP project are only beholden to federal regulations for those activities, whereas SEAs typically also must follow overlapping state government regulations, which can add complexity and confusion to program administration.

 iii. The CSP grant program under the Every Student Succeeds Act (ESSA) emphasizes **parent and community engagement** to ensure the program is flexibly responsive to the needs of the state's charter school sector.

 iv. CSOs are an important element of the charter sector with dedicated **expertise** and should be engaged regarding SEA CSP grants to inform program design and adjustments, particularly around technical assistance.

 v. CSOs are usually involved in pre-planning **support for developer teams** and know the capabilities and needs of schools heading into planning and implementation stages.

 vi. Many CSOs are already engaged in granting activities for charter school development; CSP engagement can help **clarify** how various granting activities align or overlap.

 vii. CSP engagement provides an opportunity to help establish a **seamless and comprehensive system** of supports for charter schools and authorizers from pre-planning through implementation and renewal.

 viii. Engagement offers improved understanding of the **impact** of CSP program(s) on the state's charter school sector.

 ix. Engagement cultivates **broader awareness of challenges and barriers** to charter school planning, implementation, and innovation across the state.

    x. CSOs are **mission-focused** on charter school success, whereas SEAs have multiple focuses.

    xi. CSO engagement helps ensure CSP programming is **aligned** with the needs of the state charter sector.

    xii. Engaging with CSP provides increased **engagement with authorizers** through authorizer technical assistance components.

    xiii. CSOs are better able to identify and flag **federal grant opportunities** to potential applicants.

b. Benefit from general opportunities for engagement with federal CSP activities beyond State Entity (SE) grants.

    i. If there is not an existing SE CSP program in your state, charter schools can apply directly to federal CSP developer competitions for new activities, such as replication and expansion. CSOs are well positioned to assist potential applicants with this process to improve their chances of developing a successful federal application.

    ii. CMOs and charter networks in your state may be interested in or have received a direct federal CSP grant to replicate or expand in your state. Likewise, national CMOs that have received federal CSP funds may be interested in launching a replication or expansion project in your state.

    iii. National or regional organizations may have received federal CSP funding to provide research, technical assistance, or support that might be relevant to CSOs, their clients, or others in their state's charter school sector. Knowing which organizations have been funded and the funded programs enables the CSO to know and connect others to these resources.

Levels of Engagement with the CSP that CSOs should consider:

There are several degrees of involvement available for CSOs to consider when engaging in CSP programs and activities.

I. **Supporter:** Support charter school applicants through the subgrant (or direct federal grant) competition(s). This level of involvement could include:

    i. Being aware of the state's CSP project and/or the direct federal grants, including application process, parameters of participation, and technical assistance offered.

    ii. Providing letters of support for a proposed federal application.

    iii. Offering details about federal CSP opportunities to state entities that are interested in sector development.

    iv. Sharing federal resources on the CSO's website, such as:

        i. Links to direct federal CSP developer and CMO grant competitions.

    ii. Provide linked resources to CSO facilities support and credit enhancement recipients, as well as best and promising practices concerning facilities acquisition such as from the [Charter School Facility Center](#).

    iii. Resources from the National Charter School Resource Center (NCSRC) and other CSP-funded technical assistance and training resources.

II. Influencer: Ensure the program in your state addresses the current and future needs of schools by:

    i. Actively networking, lobbying, or working with the state CSP team to shape and influence subgrant requirements, identifying potential flexibilities, and helping to identify sector needs that CSP technical assistance offerings could address.

    ii. Meeting with the state CSP team yearly, quarterly, or monthly.

    iii. Serving as a conduit to charter schools for the SEA/SE and their CSP team.

    iv. Helping to build a comprehensive strategic agenda for charter schools in the state working with all parties including nonprofit organizations, CMOs, independent schools, parent advocates, etc.

III. Partner: Help shape state CSP offerings as a technical assistance delivery partner. In this scenario, the state CSP team would set broad goals, but then partner to deliver technical assistance contractually through either design and/or delivery of technical assistance offerings or through teaming up resources with both the CSO and SEA/SE presenting staff/resources to mutually deliver activities that meet the objectives of both organizations. Note: If the CSO is looking to be a delivery partner of activities under a state CSP program, this is often arranged formally via a competitive RFP process, per federal procurement requirements. Be aware of RFP procedures ahead of time to ensure any "influencer" efforts do not inadvertently make the CSO ineligible to bid.

IV. CSP applicant/grantee: Apply to administer a state CSP project. This is especially critical if no other entity in the state is willing to administer a CSP project or if the current or previous state CSP project had shortcomings or a direction contrary to what might be best for the state's charter sector. Before applying for a grant directly a CSO should consider:

    i. Capacity and capabilities to design, apply, and launch a federal project, which has strict parameters and can be quite technical.

    ii. How running the CSP program will integrate with and/or complement the CSO's existing work:

        i. Will private funding be paired with a CSP program to cover pre-planning and planning expenses before developers submit a federal subgrant application or cover elements for which federal CSP funds cannot be used?

        ii. What are the advantages of moving the CSP program to the CSO?

        iii. Will placing the state's CSP program with the CSO provide for more seamless support to charter applicants?

    iv. What percentage of new charter schools is the CSO already working with?

    v. How closely is the organization's desired work already aligned with federal CSP priorities?

        1. Providing rural communities with more high quality school options

        2. Serving more educationally disadvantaged and at-risk students

        3. Increasing the number of high-quality high schools

        4. Ensuring "high-quality" educational programming (see federal definition [ESEA section 4310(8)](#))

        5. Providing Authorizing support

iii. How will housing the state's CSP program with the CSO lead to rethinking and changing systems to transform the education landscape?

    i. How will CSP activities include more strategic supports to complement grant-making activities?

    ii. How will CSP activities include more strategic supports than just handing out money?

    iii. How will the CSP program position charter schools as a strategy toward achieving broader systems change across the state's education sector?

iv. Consider potential conflicts of interest depending on the preexisting relationships between the CSO and charter schools in the state.

    i. Does the CSO provide back office services to schools, especially at a cost?

    ii. Does the CSO collect dues from schools that might be eligible to apply for a CSP subgrant?

    iii. To what extent has the CSO provided technical assistance to schools in developing charters or grant applications? How will the CSO ensure subgrant review, scoring, and awarding decisions are made independently?

    iv. How will the CSO delineate grant administration from other services?

II. TIMELINE: DEVELOPING A CSP STATE ENTITIES PROPOSAL

Preparing a federal grant application for a multi-million-dollar, multi-year program is no small task, and the application window can be as short as four weeks. The most polished proposals are often developed well in advance of the competition announcement. The purpose of this timeline is to help CSOs identify work that can be done prior to the competition announcement, anticipate what will be needed during the application window, and understand what to expect immediately following award announcements.

Before the Competition Is Announced

a. **Evaluate organizational fit and capacity.**

   i. Look through the [federal CSP website](#) to get a feel for the CSP State Entities project.
   ii. Read through [instructions and trainings](#) from previous application rounds.
   iii. Identify and review a few [previously funded applications](#) from states with similar components such as size, political dynamics, expansion plans, charter legal structure, etc.
   iv. Identify the types of activities this grant can support to address current and future needs of charter schools in your state.

Must-Have Activities (required CSP program elements)

- ▶ Broad notification of CSP funds available and RFA cycle
- ▶ Subgrant competition (RFA) annually
- ▶ Subgrant peer review
- ▶ Subgrant programmatic and fiscal monitoring
- ▶ Reviewing subgrant expenditures
- ▶ Distribution of subgrant reimbursements
- ▶ Technical assistance concerning CSP subgrant application and program participation
- ▶ Technical assistance to subgrantee schools
- ▶ Maximize charter access to state and federal funding programs
- ▶ Solicit parent and community input in designing and implementing the CSP project
- ▶ Federal reporting
- ▶ Delivery of identified project measures and outcomes
- ▶ Federal monitoring and technical assistance (quarterly calls, annual project directors meeting, mid-project monitoring visit)

Recommended Activities (typically found in most state CSP programs)

- ▶ Subgrantee school site visits
- ▶ Collection of and sharing best and promising practices
- ▶ Technical support to charter authorizers
- ▶ Technical support to developing charter schools (new, replication, and/or expansion), including facilities planning support
- ▶ Strategies/support for inclusive recruitment and enrollment
- ▶ Weighted lottery allowance for subgrantees
- ▶ Strategies/support for at risk students, including promoting student retention
- ▶ Elimination of duplicate reporting for authorizer/Local Educational Agency (LEA), SEA, and CSP subgrant program

Nice-to-Have Activities (if resources allow)

- ▶ Technical support to struggling charter schools, district schools, and LEAs
- ▶ Second subgrant competition should funds not be fully expended in the first round
- ▶ Opportunity for some/all applicants to revise and submit their subgrant application for a second review
- ▶ Technical assistance to closing charter schools and their authorizer
- ▶ Technical support for facilities access and financing

    v. What fits your organization's mission? What falls within existing capabilities? Do you have someone capable of implementing and managing a CSP project? What external capabilities will need to be sourced through a partner? How much additional staffing capacity will you need to deliver the project outcomes? How can you divide that capacity into clear roles and responsibilities?

b. **Assemble a design and drafting team**. Consider the following skillsets. This could be one multi-talented leader, a complementary pair, or team of people supporting a project manager.

    i. **Visionary and project designer**: Someone with a leadership position within the CSO who deeply understands the educational landscape in the state, has project direction or design experience, can identify desired outcomes, and can generate stakeholder and partner engagement

    ii. **Project manager**: A detail-oriented multi-tasker who can break down the project into feasible chunks, identify a reasonable timeline for each element, and manage completion of project elements by various team members

    iii. **Draft writer(s)**: Someone with strong technical writing abilities (for example, someone with a master's degree that was research-based, preferably in the field of education) who can write dense language that is data rich or a team of writers with the best writer overseeing sections to ensure the application remains consistent and coherent in its presentation of information

iv. **Data and policy person**: Someone who has access to state and sector data; knows how to navigate state and federal statutes (or at least look them up); and understands how to establish SMART (Specific, Measurable, Attainable, Relevant, Time-based) goals and identify input, output, and outcomes measures and interim benchmarks for demonstrating progress toward the proposed project objectives and activities

c. **Create a grant drafting plan and timeline**. Drafting a 60-page application and appendices takes time. Establishing a plan before the competition is announced will help maximize the competition period (typically four to eight weeks) and eliminate the mad rush at the end that compromises quality.

   i. **Minimum time needed**: With a strong technical writer working on their own, expect a thorough first draft will likely take around 60 to 70 hours of concentrated drafting time.

   ii. **Typical time needed**: If a distraction-free environment is not feasible, or a team is drafting the application, or the writer is not an experienced technical writer, it may take twice as much time (120 to 150 total hours) to develop a quality, substantive draft.

   iii. **Time for milestones, review processes, and final approval**: Establish how much time will be needed for draft review, subsequent draft corrections, and finalizing and submitting the application package. Be sure to plan ahead to block out time and/or leave sufficient time in the process if this part of the timeline requires interaction and approval from individuals with limited time capacity.

d. **Register with the required federal systems as soon as you can.**

   i. DUNS code
   ii. iSystem for Award Management
   iii. Federal grants website
   iv. G5 – U.S. Department of Education's grant management system

e. **Begin developing a project rationale and design**. The project rationale and design will eventually form the logic model submitted with the application. They provide the basis for project activities and identify corresponding outcomes the project will achieve.

   i. **Identify the scope and overall budget for your proposed project** (use the budgeting tools provided in **Section III**).

      1. Identify the number of charter schools eligible to apply for your subgrants each year and the proportion of those applicants you expect to put together a successful application. The number of awards should be smaller than the number of applicants to create competition and drive quality. When developing this pipeline, consider:

    A. Unmet student demand, i.e., students in poorly performing schools and/ or students on charter school waitlists.

    B. Charter school developers planning schools.

    C. District/authorizer plans for inviting charter applications (turnaround/ restart programs, solicitation of charter applicants to address capacity needs, etc.).

    D. Existing schools that could be persuaded to expand/replicate.

    E. Historical trends in the number of charter applications and number of charter openings per year.

2. **Identify subgrant periods and range of funding for each subgrant award**. Think about the range of typical costs for launching a school in your state to determine a reasonable amount of one-off costs that are needed for start-up/replication and expansion/turnover and that are not covered by public funding. Also determine how the award amount should be pro-rated for small schools and smaller expansions.

3. **Set your budget**. Use the budgeting tools in this toolkit to establish a total subgrant amount needed over the project, which will make up 90+% of the overall project funding request. Likewise, calculate the corresponding 7+% technical assistance budget and <3% administrative budget amounts based on the targeted subgrant total amount. The draft total federal request is the total of all three.

ii. **Determine the scope of both required and desired activities under the CSP project and decide how to tailor these activities to meet the needs of your anticipated subgrant applicant cohorts and b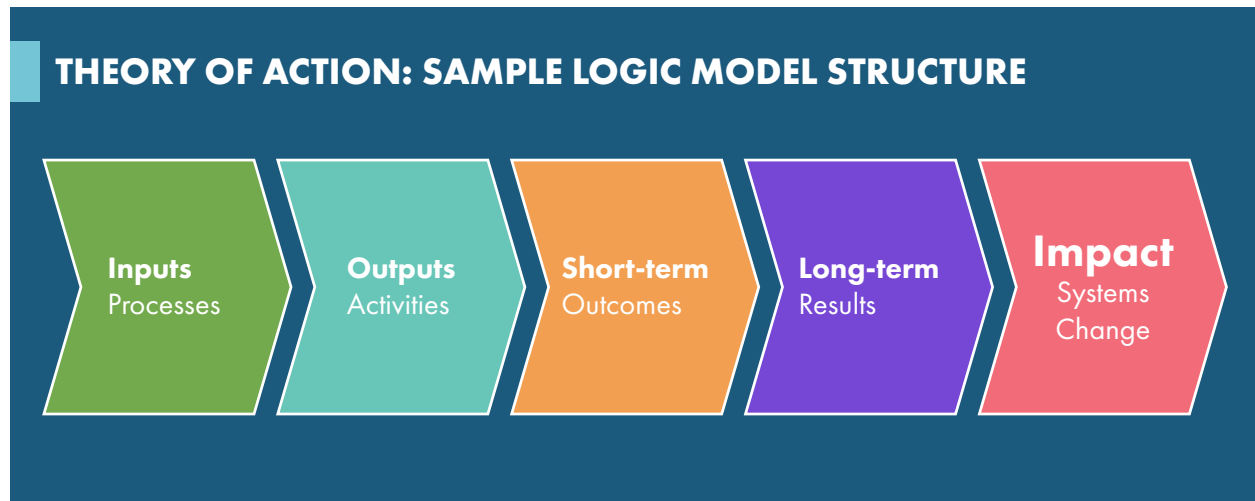roader statewide charter sector**. Think about how the grant will emphasize and respond to your state's unique characteristics. Consider which required and desired activities are feasible to accomplish within the technical assistance and administrative budgets. Early scoping of activities could include:

1. Developing subgrant selection criteria.

2. Determining subgrant competition processes.

3. Developing risk assessment and monitoring protocols (for both programmatic and grant fiscal management activities).

4. Determining subgrant monitoring processes.

5. Beginning to develop subgrant monitoring protocols.

6. Designing subgrant technical assistance.

7. Identifying type(s) of authorizer supports.

8. Determining any provision for sector-wide technical assistance and dissemination of best practices.

iii. **Identify the core components of your logic model (also known as a "theory of action") that provides a rationale and justification for each program element**. This rationale should include within the logic model diagram the identification

of *key project components that are informed by research or evaluation findings that suggest the project component is likely to improve relevant outcomes (34 CFR 77.1)*. An effective way to start the development of your logic model is to identify the long-term vision of what is ultimately desired and what is ambitious yet achievable within five years (typically informed by budget availability, see **Section III**). Then identify overarching objectives, measures (that demonstrate successful progress toward meeting objectives), and activities. This is one common way to structure a logic model, starting with listing inputs and progressing to long-term and systemic impact:

THEORY OF ACTION: SAMPLE LOGIC MODEL STRUCTURE

Inputs Processes → **Outputs** Activities → **Short-term** Outcomes → **Long-term** Results → **Impact** Systems Change

Definitions of logic model components

1. **Objectives**: Typically, there are two overarching objectives, one for subgranting and another for technical support and monitoring. Subgrantee monitoring could fall under either objective. Ensure your objectives incorporate the principles of SMART goals.

2. **Project component**: Components include activities, strategies, interventions, processes, products, practices, or policies. Outcomes may pertain to an individual project component or to a combination of project components (e.g., training subgrant applicants on budgeting requirements and monitoring and technical assistants subgrant recipients during the subgrant award period)

3. **Relevant outcome**: The student outcome(s) or other outcome(s) the key project component is designed to improve, consistent with the program's specific goals.

For technical assistance in developing effective logic models and performance measures, the federal CSP team advises applicants to review information provided by the Regional Educational Laboratories.

It can also be helpful to look at logic models in funded applications to get a sense of how they can work best for your project.

iv. **Develop performance measures**. All federal grants are required to identify and annually report on performance measures aligned to the activities of the grant. Consider how you will use data to measure and quantify your program's impact. Be thoughtful in choosing measures, as you will report on these measures in both your annual report and the final reports for the CSP award. Measures are a key component of robust objectives that align with SMART goals principles.

1. **Government Performance and Results Act (GPRA) performance measures**: Specific measures are required of all CSP grantees and must be included in your project's proposed measures. These measures will be identified in the instructions in the application package published for each specific CSP grant competition. These are the measures that were listed in the most recent federal CSP State Entities Grant, for which state entities need to quantify their contributions toward:

   A. The number of charter schools in operation around the nation
   B. The percentage of fourth- and eighth-grade charter school students who are achieving at or above the proficient level on state examinations in mathematics and reading/language arts
   C. Federal cost per student in implementing a successful school (defined as a school in operation for three or more years)

2. **Project-specific performance measures**: Applicants must propose project-specific performance measures and targets consistent with the objectives of the proposed project (per 34 CFR 75.110(b) and (c)). Ensure that any proposed project-specific measures can be reported annually. Measures should be relevant to the objectives and activities proposed in the logic model, measuring the demonstrated impact of the proposed CSP project. It is encouraged to include measures tied to student academic achievement (see previous applications for examples).

3. **Performance targets**: Identify ambitious, attainable annual targets for each measure. CSP grantees are required to report progress toward these targets in their annual report.

v. **Determine how you will collect data**. Once measures are identified, determine if baseline data of previous/current performance are needed or if data can be established in the first year of the CSP award. If baseline data does exist, consider aligning your proposed project measures to those existing measures to ensure continuity and reliability.

Identify the data collection and reporting methods that you will use to gather reliable, valid, and meaningful performance data, including what capacity the organization has (or will outsource) for high-quality data collection, analysis, and reporting. Does the organization have experience with this on other projects? Or will it need to partner or contract with another entity for support?

During the Competition Period

a. If your organization has not done any pre-competition planning, start with the elements listed in "Before the Competition is Announced" above.

b. Read the Federal Register competition announcement and the application package instructions. Note any questions you have.

c. Attend federal application training webinar(s) and ask questions about anything that was unclear in the application package instructions.

d. Create a project narrative outline, following application package instructions and webinar guidance, with a list for each section that includes:

   i. Elements called out in the competition scoring rubrics.
   ii. Previous related work of the CSO and other state agencies/organizations.
   iii. Anticipated grant-related activities.
   iv. State program and statute references.
   v. Elements of federal CSP statutes relevant to that section.

e. Translate potential activities into a draft programmatic delivery plan, which will become the management plan needed for the application.

   i. Establish a timeline of subgrant, admin, and technical assistance activities.
   ii. Assign a lead person and any support persons or partners that will ensure delivery of each.
   iii. Assemble resumes of designated staff, job descriptions for staff to be hired with CSP funds, and memoranda of understanding or letters of support outlining the scope of partner support.

f. Draft grant budget and staffing plan.

   i. Staffing and programmatic costs are limited to 10% of the requested award amount. All staffing and programmatic costs need to fit into this 10% allotment, and all activities split accordingly between the <3% admin budget and the >7% technical assistance budget based on program guidance and training provided (**see** *Section III - Comprehensive Program and Budget Design* for more specific information on grant budgets).
   ii. You may need to adjust desired activities based on funds available.

g. After drafting programmatic delivery and budget plans, develop the logic model to demonstrate how objectives, activities, delivery plan, and desired outcomes all fit together.

h. Build/draft project narrative around this logic model, staffing plan, grant budget, and management plan.

i. Draft budget narrative, utilizing draft budget and management plan, ensuring all activities outlined in the project narrative draft are reflected in the budget. Adjust the budget narrative, budget, and project narrative, as needed.

j. Identify performance measures that include input, output, and outcome measures for the proposed project activities. Include GPRA-required measures as identified in the application package instructions.

k. Have draft project and budget narratives reviewed by key internal and external stakeholders using the competition scoring rubrics.

l. Incorporate feedback and prepare documents in the final format needed for submission.

m. After one final review to ensure application package instructions have been followed, submit a complete application package to grants.gov.

Your Application Was Successful. Now What?

1. A formal notification will be sent from the federal CSP office. It will contain:

    a. The approved amount of the grant award, and proposed distributions of funding.
    b. A list of elements that will need to be revised and/or require more information. Most of these are due before any administrative or technical funds can be released. Providing this information takes anywhere from one to two months and up to four to six months. Keep this in mind when identifying draft date(s) for the initial subgrant competition.

2. **Further develop and finalize subgrant RFA**. Typically, before the federal program manager releases grant funds to the grantee, the awardee must first procure and finalize approved documents concerning its RFA process for awarding subgrants. Keep in mind that the approval of your RFA could take longer than anticipated as a few rounds of edits may be necessary. Allow sufficient time for this process before your first subgrant competition, otherwise you may be forced to delay or modify your inaugural process.

3. **Further develop and finalize risk assessment and fiscal management protocols**. The federal Uniform Guidance (2 CFR Part 200) requires that entities awarding subgrants use a risk assessment for programmatic and fiscal risk that informs the level of technical assistance and monitoring the subgrantee will receive. CSP grant recipients are required to finalize risk assessment and fiscal management/monitoring protocols prior to final approval to begin their subgrant program.

4. **Seek training for relevant staff**. Compliant programmatic and fiscal management of federal grants is typically quite complex. To aid in understanding the regulations and requirements governing federally funded projects, it is recommended that the CSO seek out training for relevant staff. Here is a partial list of a few providers:

    a. Brustein & Manasevit, PLLC attorneys: The firm can also be contracted to do a mock monitoring visit, draft policies and procedures for grant management, train fiscal and program managers to manage the grant and kept on retainer for support/questions, etc.

    b. CFO.gov: Will not work in Chrome browsers, requires Flash.

    c. MyFedTrainer.com: This company provides a variety of available resources and trainings regarding federal grant regulations.

Your Application Was Not Successful. Now What?

1. Don't get discouraged. This isn't the end of the road.

2. Having already been through the competition process, your team has picked up valuable experience about CSP application process and will be better prepared for the next competition cycle.

3. View this as an opportunity to learn from reviewer comments and prepare a stronger proposal for the next cycle.

III. COMPREHENSIVE PROGRAM AND BUDGET DESIGN

While CSP specifics vary from state to state, the structure of CSP applications and the basic building blocks of CSP state programs have similar essential components. This budget design tool set incorporates these components to aid in creating, drafting, influencing, and/or improving a CSP State Entities application to ensure comprehensive program and budget design. Each tool is presented on a separate tab of the resulting CSP Budget & FTE Calculator Tools workbook:

- ▶ Subgrant awards calculator
- ▶ Five-year macro budget
- ▶ Budget narrative template
- ▶ Grants fiscal FTE calculator
- ▶ Project staff FTE calculator

Structuring the Program

There are three main components to every state CSP, which form the basis of the budgeting structure for the CSP state entities grant, and each proposed CSP grant activity needs to clearly fit into one of these components:

1. **"D," subgrant distribution ("D")**: These subgrants provide funds to eligible applicants for the opening of new charter schools and for the replication and/or expansion of high-performing charter schools.

2. **"A,"administrative budget (D / 0.9 * 0.03 = "A," the maximum admin budget)**: Administrative items include things like program direction, program oversight, subgrantee competitions, subgrantee monitoring/reporting, grants fiscal support for budget approval, processing of reimbursements, and fiscal monitoring/reporting.

3. **"T," technical assistance budget (D / 0.9 * 0.07 = "T," the minimum technical assistance budget)**: This component includes technical assistance for the grant management team (trainings and on-call retainer, monitoring annually of practices to review and improve the project), supports to charter schools and authorizers, collection and dissemination of best and promising charter school practices to both the charter and non-charter sectors, pre-planning support to charter school developers, etc.

Your proposed CSP budget is determined by this equation:

Total Federal Request ("R") = $D + A + T$, where ($R \leq D / 0.9$) AND ($R \leq T / 0.07$) AND ($R \geq A / 0.03$)

"D," The Basis for the Budget

The basis for beginning to develop the budget for your proposed CSP project should begin with identifying feasible targets for subgrant awards to determine the amount desired for "D," subgrant distributions.

- ▶ Use the subgrant awards calculator to determine subgrant distributions.
- ▶ Follow the instructions at the top and in Column H of the tool to populate the chart.
- ▶ The tool currently provides an example from a fictitious scenario to guide you in understanding how to populate the tool. Some cells have sample formulas with instructions in Column H on how to adapt them.
- ▶ Once completed, this tool will demonstrate:

  - ▶ The anticipated number of CSP subgrant applicant for each project year.
  - ▶ The anticipated number of CSP subgrant recipients for each project year.
  - ▶ An average subgrant award amount.
  - ▶ The proposed total subgrant distribution funding request (cell G14).
  - ▶ The targeted number of new charter school seats.
  - ▶ The average amount per school seat.

- ▶ Once the total subgrant distribution is determined, it can be used to calculate the desired target amounts for "A," administrative budget and "T," technical assistance budget.

Determining the Project Year Breakdowns

The annual amounts for "A," administrative budget and "T," technical assistance budget are limited in a given project year by their ratio to the subgrant distributions obligated in a given project year. The federal program allows for various timelines for obligating funds for subgrant awards, so there is some flexibility in the "D," subgrant distributions amount budgeted each year. Determining which obligation option to use will help anticipate a more exact budget amount for each project year for each budget component.

The five-year macro budget tool provides a description of each of the obligation models and proposes a rationale and logic to guide consideration for use of each. The default distribution is to obligate one year at a time, but this might not make the budgets for the "A," administrative budget and "T," technical assistance budget feasible to maximize potential delivery of the activities, objectives, and goals of the proposed project since the pace at which you obligate subgrant awards is also the pace of allocation for "A" and "T" budgets. To assist in this decision, use the tool as follows:

- ▶ Populate the proposed number of awards each year in the tables at the top of the tool.

- ▶ The breakdowns in the colored "Obligate" models will self-populate.

- ▶ To populate the "Obligate" models, fill proposed awardees and award amounts in the "Subgrant Distribution Modeling" table below the "Obligate" model tables. The formulas in the "Subgrant Distribution Modeling" table are currently set based on a per-pupil award amount. Adjust the formulas accordingly for your proposed subgrant award structure.

- ▶ Once populated, the "Obligate" tables will demonstrate the breakdown of "D", subgrant distributions, "A," administrative budget and "T," technical assistance budget by project year and for the total program for each "Obligate" model to determine the proposed CSP budget request.

- ▶ Consider which "Obligate" model best suits your project's structure and financial needs.

- ▶ Once an "Obligate" model is selected, a budget narrative can be developed based on the CSP budget request.

Determining Personnel Costs

Personnel costs are likely the biggest budget item outside of subgrant distributions. CSP projects must include both programmatic project staff and grants fiscal staff, which then must be split in the budget narrative between administrative activities and technical assistance activities. To accurately determine a realistic FTE for proposed personnel, consider using the grants fiscal FTE calculator and the project staff FTE calculator to identify the anticipated time and effort spent on typical CSP-related activities. These FTE calculators are pre-populated with examples of CSP-related activities from typical CSP grants but can be easily modified to add or remove programmatic elements. At the top of each tool you will see shaded cells with an embedded formula that populates into annual FTE and average FTE calculations. Once a projected staffing FTE is determined, this can be used to sense check the planned staffing model for the proposed CSP project.

Populating the Budget Narrative

The budget narrative tool is designed to help plan for the breakdown of personnel and project costs by project year. It allows for input of costs "per unit" and by "# of units" that populate into dollar amounts within the table. Descriptions of costs included and budget justification can then be drafted within Column H. Column K contains notes regarding formulas and other elements. The structure of this tool provides for the breakdown in costs for each budget category by admin, technical assistance, and subgrant components. Section subtotals and totals are coded to automatically populate so long as the formulas are not disrupted. There is a checking table at the bottom of the document that can be compared to the obligation model table amounts from the five-year macro budget tool to provide reassurance of accuracy in budgeting.

IV. CREATING A PROPOSAL TO RUN A CSP PREVIOUSLY ADMINISTERED BY THE SEA

INCORPORATING STRUCTURES AND ACTIVITIES FROM THE PREVIOUS CSP STATE PROGRAM

With a CSP project proposal, there is no need to start from scratch. In fact, incorporating structures and activities from the previous CSP state program could be advantageous in providing continuity for current and future applicants; however, do not assume you have to structure your CSP project in a similar way. Think creatively about what is best for your state's charter sector going forward, focusing on your organization's capabilities and strengths.

When thinking through program structure, design, and activities, these are some of the steps to take:

1. **Identify the climate under which the CSO will be submitting its CSP proposal and how it will impact the program design and execution**. The context in which the CSO is applying will and should have an impact on the CSP proposal that the CSO develops. Consider these questions:

    a. Is the CSO attempting to take over a CSP state program that the SEA would prefer to hold on to?

    b. Will submitting a CSP proposal put the CSO at odds with any stakeholders in the state's charter sector?

    c. Is the CSO submitting a proposal at the same time as the SEA or another state entity?

    d. Has the SEA been unable to run the previous program effectively?

    e. Has the SEA been unable to renew its previous CSP proposal through subsequent applications?

    f. Have stakeholders in the state's charter sector asked the CSO to take over the program?

    g. How will the nature of the situation impact what partners and external support the CSO can pursue?

    h. Should the CSO's CSP proposal be successful, despite opposition, what can be planned to help bring the community back together in support behind CSO administration of the CSP state program?

2. **Identify and continue successful CSP activities**. Take a thorough look at the structure and activities of the previous CSP project:

    a. What processes and procedures were used?

    b. Did they run smoothly?

    c. What elements served the sector well, and how can you continue and build on those within the new CSP application?

3. **Identify areas where the previous CSP project fell short**. Ask these questions to get started:

    a. What things did not work well under the previous program?

    b. Were there frustrating or overcomplicated processes?

    c. Did lax procedures lead to compliance problems?

    d. What can you learn from those shortcomings?

    e. How can you stitch up or improve previous processes and procedures?

4. **Identify previous partners and/or supporters and evaluate them for engagement on the new project.**

    a. Was the SEA working with any local, state, or national partners as part of its CSP project? If so, what resources, support, and/or services were they providing?

    b. Is it suitable, feasible, and/or desirable for the SEA to serve as a partner or supporter for the CSO's proposed CSP project?

    c. Would any of the existing partners or supporters of other CSO projects/ programs lend support to the proposed CSP project?

    d. What letters of support did the SEA have for its CSP project? (See its application archived on the federal program website.) Could the CSO could also gain support from these entities?

5. **Ensure there is no overlap between CSP projects.**

    a. When will the SEA's CSP funding and activities end?

    b. Will some activities finish before others? If so, which ones?

    c. Is there an opportunity to take on new activities or continuations of activities the SEA has finished while the SEA is wrapping up other activities? For example, could the CSO take on technical assistance and planning subgrants while the SEA finishes a final year of implementation funding for a few schools?

6. **Ensure no overlap in subgrantees**. Under federal statute, a charter school may only receive one CSP subgrant for a particular scope of activities (for example, the start-up of a new school or campus).

    a. What mechanisms and procedures can be put in place to ensure that a project funded under the previous CSP project will not be able to seek or receive funding under the CSO's proposed CSP program?

    b. Will subgrantees under the SEA finish out a full planning and implementation award?

    c. Will there be subgrantees whose new schools will be only partially funded when the SEA project ends?

    d. For schools that only received a partial award from the SEA (for example, a one-year planning grant), will the CSO enable them to continue with another partial award under CSO's program to equate to what would have been a full award?

i. If so, a waiver will need to be requested that demonstrates parameters that will ensure no double-dipping. This waiver can be submitted on a case-by-case basis to the federal program for each individual relevant subgrant, or it can be included as a general waiver request for the duration of the CSO's funded CSP project.

ii. You'll likely also need a letter from the SEA stating how it has or will limit its last round of subgrants to include partial awards and when those final partial subgrants will finish to show that subgrants will not overlap.

iii. Any award under the new CSO-administered CSP program would need to ensure that the combination of the former and new CSP subgrants do not exceed the statutory maximum CSP subgrant award of $1.5 million over 60 months (five years).

▶ *See the following page for sample waiver request language.*

7. **Consider an advisory group that includes the SEA**. If the SEA and CSO are on friendly terms, consider including the SEA in an advisory group for the CSO's CSP project. This group could meet quarterly to coordinate efforts so that activities are not duplicative and help the CSO access valuable ESSA, accountability, and other key information from the SEA that could assist the CSO in supporting both the sector and subgrantees.

8. **What happens if the SEA asks for an extension of its existing CSP project**? If the previously funded SEA CSP project has not yet exhausted its funds at the time the CSO is awarded, it is still possible for both programs to run simultaneously, but the SEA and CSO need to coordinate the end of the SEA program and the beginning of the CSO program. The key is to ensure that applicants are not simultaneously eligible for both projects. When Nevada ran into this situation in fall 2020, its solution, ultimately approved by the federal CSP team, was to have the SEA exhaust its funds by providing one-year continuation awards to schools it had previously funded, and direct new applicants to the new CSO project. Once the SEA has exhausted its funds, the CSO can utilize a general waiver to provide one final continuation award to any SEA subgrantees that have not yet finished their CSP-funded projects.

SAMPLE WAIVER REQUEST LANGUAGE

3 (i)5: Waivers to Statutory or Regulatory Provisions

Waiver Request: Implementation Only subgrant eligibility for previous partial CSP subgrantees under the SEA's previously-funded CSP project

[CSO name] requests a general waiver to section 4303(e)(2) of the ESEA to enable schools that previously received a planning-only CSP subgrant from the former SEA-administered CSP project to receive within a 5 year period a second CSP subgrant under [CSO]'s CSP Project without having to demonstrate that the school has three years of improved educational results for students enrolled with respect to the elements described in section 4310(8)(A) & (D). A second CSP subgrant issued by [CSO name] would exclusively be for implementation-only activities to carry out implementation of the new school, expansion, or replication project funded by a planning-only CSP subgrant from the SEA.

Relevant context and rationale: the SEA has decided not to continue its CSP program in [state], and as a result there are some charter school developers that will have received a partial CSP subgrant award only for the Planning phase of their new school, expansion, or replication project. [CSO name] is applying to re-establish and run a CSP project in [state] through this application to ensure continuity of CSP subgrant availability and technical assistance support to our state's growing charter school sector, and would like to enable these developers to be eligible to apply for a CSP Implementation-Only subgrant award to support the implementation phase of their new school, expansion, or replication project. The rationale for requesting this waiver is that these implementation-only applicants to [CSO name]'s CSP subgrant have not yet begun implementation or are in the very early stages of implementation and thus do not yet have any educational performance data. Similarly, these applicants would be less likely to be able to establish as strong a foundation to ensure high-quality educational results without the support of remaining in a CSP subgrant program during the initial years of their implementation, and thus their potential success could be undermined without the opportunity to continue participation in a CSP program through a second partial CSP subgrant. Eligibility for this category of applicant would be reviewed in partnership with the SEA to ensure that there is no overlap with the scope and funded activities of any previous SEA-awarded CSP subgrant and any [CSO]-awarded CSP subgrant.

V. FEDERAL MONITORING FOR CSP GRANTEES

Federal statute and regulations require that all recipients of federal funding are monitored to ensure funds are being used appropriately and objectives are completed. This section describes typical monitoring processes under federal CSP grant projects to help CSP applicants become aware of and develop the capacity to incorporate these monitoring requirements into their CSP project design.

What Is Monitoring?

Monitoring is the process that provides oversight of grantees to assess progress toward project objectives and evaluate alignment with program statute, regulations, and guidance. The process helps the grantee continuously improve and alerts the federal office when additional support and technical assistance would be beneficial. CSP grantees and subgrantees need to understand the monitoring process so that they can plan appropriately for necessary administrative procedures and staffing decisions.

The diagram below outlines the various monitoring components currently used by the federal CSP grants both by the Department of Education's CSP program team ("ED"), and by its monitoring contractor, WestEd.

CSP Grantee Monitoring

- ▶ **Post-Award Calls** by Education Department
- ▶ **Quarterly Calls** by Education Department
- ▶ **Subaward Data** by WestEd
- ▶ **Monitoring Visits** by WestEd
- ▶ **Corrective Actions Plans** by Education Department
- ▶ **Technical Assistance** by Education Department

Subgrantees are typically provided with a State Entities CSP Monitoring Handbook (WestEd) during the post-award processing period. This resource lays out the full monitoring framework for CSP grant recipients and typically includes:

- Introduction to the monitoring elements and instructions and timelines for compliance
- Data collection process and methodology
- Monitoring feedback and follow-up processes
- Monitoring indicators and acceptable evidence

  - Section I: Subgrant application and award process
  - Section II: CSP and charter school quality
  - Section III: Administrative and fiscal responsibilities

- Indicator source crosswalk

Federal Monitoring Components Explained

Post-award calls (by Education Department team)
There is usually a webinar or video call for all recent CSP awardees shortly after awards are received. In addition, their federal program manager may call CSP awardees. These calls usually review the general mechanics and deliverables of the CSP grant program and review revision and document-submitting processes needed to finalize and meet any conditions of the CSP award.

Quarterly calls (by Education Department team)
CSP project managers typically host a scripted quarterly call with each of their CSP grantees. Typically, they send out an agenda ahead of time with questions and information for CSP grantee to fill in and return ahead of the call. With the high level of staff turnover at the federal CSP team over the past year, some of these calls have been combined into a group call/video chat.

Annual project directors training (Hosted by Education Department, with support from WestEd)
CSP state entities project directors (and/or project managers) are required to participate in an annual training. This technical assistance and training event, which typically falls sometime between February and April each year, is hosted at or near the U.S. Department of Education in Washington, D.C. or delivered virtually. While two to three months' notice is usually provided, sometimes it is only three to four weeks.

The training covers potential program changes, technical assistance identified as a result of monitoring findings, and general support for CSP implementation and delivery. It is a good opportunity to meet the directors/managers of CSP projects in other states and ask questions and seek information on best practices to improve CSP delivery on the ground.

Note: In recent years this training has been hosted simultaneously with the CSP CMO project directors meeting. Some CSOs noted that this overlap between programs was not always made clear to participants during sessions and workshops.

Online reporting and data collection (by WestEd)

Program monitoring is a continuous process that involves multiple points of input into an online system. Reporting and data collection helps track progress toward project objectives, programmatic measures, and use of funds. Technical assistance about how to report and collect data is provided following receipt of a federal CSP award and covers submission timelines and procedures for entering data into an online system. Information that must be collected includes:

1. GPRA measures

2. Programmatic measures and progress toward grant objectives

3. Financial reporting

    a. Use of funds for grant administration and technical assistance
    b. Subgrant award distributions
    c. CSP-reimbursed developer expenditures

Collecting information through the online system allows for continuous real-time data input, rather than an annual submission, which means data and reconcile financial information is available as needed, eliminating the need to set aside large chunks of time and resources for the annual report.

At the end of a multi-year project period, CSP grantees must submit a final performance report, including all financial information. The CSP team creates the structure and specifics of this report, but the final report typically includes a cumulative analysis of each year's annual reporting that demonstrates how the project delivered its identified objectives and key performance measures.

Three-day federal monitoring visit (by WestEd)

Monitoring visits occur at least once during the span of the multi-year federal award. These in-depth evaluations include review of a variety of documents and records in addition to on-site interviews and observations. Grantees are usually prioritized for a visit based on risk factors, with those demonstrating the most potential risk receiving visits first. The Education Department's contractor recruits and selects monitoring team members in consultation with Education Department's CSP team.

▶ **Prepping for visit**: CSP recipient organizations should set aside a good amount of staff time to prepare for and host the site visit. Structuring record-keeping around the monitoring indicators and information needed for the visit will help streamline the amount of time needed:

▶ Become familiar with the monitoring indicators.

▶ Ensure your CSP project is in compliance with relevant monitoring indicators.

▶ Identify documents or records that help demonstrate accomplishment of each criterion.

▶ Organize these files by indicator/section/indicator/criterion so they can clearly be applied to your rubric score by the monitoring team.

▶ **Once an intended visit is announced**, the monitoring team leader will:

▶ Schedule the dates of the visit.

▶ Confirm a list of current and previous subgrantees.

▶ Provide a guidebook.

▶ Communicate deadlines for assembling documents and records.

▶ Provide a rough outline of the visit schedule, including with whom the team will need to meet.

▶ Gather recommendations for travel/accommodations for the team.

▶ **Immediately prior to the visit**, the monitoring team leader should be in contact to:

▶ Confirm anticipated onsite arrival.

▶ Provide a schedule for the visit, confirming who the team will interview and who will receive an onsite visit.

▶ Identify the individual members of the monitoring team.

▶ Confirm receipt of monitoring document and records submissions.

Monitoring Indicators

Section 1: Subgrant Award Process

1.1 Descriptions and assurances

1.2 Eligible applications

1.3 Definition of charter school

1.4 Peer review

1.5 Program periods

Section 2: CSP and Charter School Quality

2.1 Strategy and vision

2.2 Quality authorizing practices

2.3 Flexibility and autonomy

2.4 Subgrantee quality

2.5 Educationally disadvantaged students

2.6 Subgrantee monitoring

2.7 Dissemination

2.8 Performance measurement quality

Section 3: Administrative and Fiscal Responsibilities

3.1 Federal programs and funding

3.2 Allocations

3.3 Administration of CSP funds

3.4 Use of grant funds

3.5 LEA deductions

3.6 Transfer of student records

3.7 Recordkeeping

- The Education Department and contracted monitoring team have developed a menu of responses they use to score each indicator, which are then rolled up into overall ratings:

    - Responses to indicator criteria

        - Implementing as proposed or necessary (no additional text necessary)
        - Implementation issues identified (explain)
        - Non-substantive changes in proposed activities (explain)
        - Promising practice(s) identified (explain)

    - Response regarding progress toward objectives

        - No concerns with data quality or performance measure interpretation
        - Performance measure not applicable at time of monitoring visit

    - Data quality/interpretation concerns:

        - Inconsistent units of measure over time
        - Data not aligned with performance measure
        - Inconsistent wording of performance measure over time
        - Incomplete or missing data
        - Other (specify)

- Rating system for monitoring indicators

    - Does not meet indicator – requires corrective action: Policies, practices, or actions demonstrate systemic or pervasive non-compliance of a monitoring indicator.
    - Partially meets indicator – requires corrective actions or substantial technical

assistance: Policies, practices, or actions meet some elements of the monitoring indicator, but also demonstrate significant areas of limited or non-compliance.

▶ Largely meets the indicator – recommended technical assistance: Policies, practices, or actions demonstrate compliance with the majority of conditions of a monitoring indicator with areas identified for technical assistance.

▶ Fully meets the indicator: Policies, practices or actions that demonstrate full compliance with an indicator.

▶ Fully meets the indicator – best practices identified: Policies, practices, or actions demonstrate full compliance with an indicator and best or promising practices have been identified.

Technical assistance and corrective action (by Education Department team and/or WestEd)

For CSP grantees struggling to comply with federal requirements, a continuum of interventions, corrective measures, and technical assistance has been developed to help address and rectify gaps in programs. These corrective actions could be seen as penalties or as positive supports and generally are intended to be more the latter. Those with or seeking to secure a federal CSP award should be aware of these interventions and plan accordingly for some level of staff effort as it will likely be needed for this purpose at points throughout the CSP award.

The corrective measures available to the federal CSP team are used to provide support and tighter oversight to enforce requirements of federal law and are usually instituted following a finding from one of the monitoring efforts. It is important to realize that the federal CSP team institutes these actions based on what it understands its obligations to be under federal law.

The levels of corrective action typically follow a chain of escalation per the following list, but if circumstances warrant, interventions could be escalated to match the severity of the situation.

1. Grant conditions: Grantees may be given additional steps or tasks to demonstrate that they are meeting all the expectations of the CSP award. These conditions could be elements put in place prior to issuing the initial grant award or could be added (or removed) at any point over the life of the grant, for example, at the time of annual renewal.

2. Corrective action plan: Should grant conditions fail to be met, a corrective action plan is put in place to provide a timeline for how specific changes will lead to resolution of the area of concern.

3. Freeze or slow grant payments: If challenges remain, the federal CSP team can place a hold on grant reimbursement requests pending extra program officer review.

4. High-risk designation: CSP grant recipients with persistent challenges may be given a high-risk designation, which can result in additional financial reporting,

stricter financial controls, or interim/additional programmatic reporting. Receiving a high-risk designation can negatively impact a grantee's ability to secure additional or subsequent awards across all federal education funding streams.

5. Grant severance: While it is rarely used, the Education Department can terminate a federal CSP grant and require return of any unspent or earmarked funds. However, usually, a grantee voluntarily terminates in order to minimize any restrictions on its ability to receive further federal funds.

Monitoring Resources

▶   Application package includes a short description regarding monitoring activities.

▶   Latest version of slide deck from project director's meeting concerning monitoring

▶   2020 CSP monitoring contacts (WestEd):

   ▶   Sara Allender, co-director, sallend@wested.org

   ▶   John Flaherty, Jr., co-director, jflaher@wested.org

   ▶   Steve Ruffini, CMO Coordinator, sruffin@wested.org

   ▶   Khadijah Salaam, SEA coordinator and data collection coordinator, ksalaam@wested.org