



December 14, 2015

**The Ohio Alliance for Public Charter Schools (OAPCS) Public Comment
To ODE's Advisory Panel Preliminary SPR Recommendations**

Good afternoon and thank you for allowing me to provide comment on the Preliminary Sponsor Performance Review (SPR) Recommendations Developed by the ODE Advisory Panel.

My name is Dr. Darlene Chambers and I am the President and CEO of the Ohio Alliance for Public Charter Schools. We are an independent membership organization and our mission is to provide children with greater educational opportunities by improving the quality and fostering the growth of Ohio's charter schools.

OAPCS is using this opportunity to highlight three important issues regarding the Advisory Panel's Preliminary SPR Recommendations that may have great implications for sponsors, schools, students and families. They are:

No Charter School Stakeholder Input and No Pilot for the Revised SPR:

- OAPCS appreciates the efforts made in the past three years to implement the **initial** SPR. The original SPR included significant input from stakeholders, sponsors, and national organizations on the compliance and quality components. We hope that the Board and the Advisory Panel fully consider stakeholder responses to these recommendations because the stakeholder feedback in the **initial** SPR was crucial to its design and effectiveness prior to the academic component changes made by the former Director of Quality Choice without any charter school stakeholder input and after the original pilot.

Intent and Unintended Consequences of the Academic Performance Component:

- We are concerned that two recommendations within the Academic Performance Component, #9 and #11, essentially will treat a Sponsor as a traditional school district in performance metrics.
- Sponsors do not statutorily function as a traditional school district and they do not manage operations at the school level. As such, Sponsors do **not** hire HR (Superintendent, school leader, teachers, and management companies) nor do Sponsors dictate curriculum or provide day-to-day management of their schools.
- Without direct operational control within their schools, Sponsors cannot exert direct control over metric outcomes outside of their contract agreements' performance frameworks **with** the non-profit school boards who are in turn held responsible for school performance by either directly managing the schools or

hiring educational service providers who operate the schools on behalf of those non-profit boards.

- Because “start-up” brick and mortar charter schools in Ohio are confined to the Urban 8, true peer comparisons in academic performance and student demographics should be between these Urban 8 traditional school districts and the charter schools within them.
- Ohio law requires Ohio Sponsors to adhere to the National Association of Charter School Authorizers’ Principles and Standards which supports a policy that sanctions authorizers if the schools they oversee persistently fail to meet performance standards set forth in the charter school contract by holding schools accountable for their contract performance goals.

Weighting Components with “Zero” within Equal Weighting of Three SPR Components

- We understand the recommended summative rating scoring structure is determined by Ohio Revised Code, Section 3314.016 (B) (6) which states that all three SPR components will be weighted equally.
- However, Section 21 - D, recommends Business Rule 1 and 2 which in effect weights one of the three components more if “0” points are scored in any “one” component resulting in an automatic “Ineffective” score even though it is possible that a sponsor could score enough points in the other two components to receive a rating of “Effective.”
- Potentially, we believe that could overweight the academic component no matter the quality work done in the other two components which actually evaluate what Ohio Sponsors were created to do – oversight and monitoring of charter school compliance with rule and law; and, Sponsor quality practices which include capacity and commitment to do their “authorizing” work including the monitoring of a sponsored charter school contract financial, operational and academic performance frameworks.

Again, thank you for allowing me to provide comment this afternoon. I am happy to answer any questions you may have.