

## Tri-State Alliance to Improve District-Led Authorizing Needs Assessment Report - Florida

### Introduction

This report provides an assessment of Florida school district authorizers' greatest needs and priorities for statewide model authorizing materials and other forms of assistance to strengthen their work in charter school authorizing. This needs assessment was conducted for the Florida Association of Charter School Authorizers (FACSA) to inform its prioritization of resources to be developed under its three-year grant as part of the Tri-State Alliance to Improve District-Led Authorizing (Tri-State Alliance).

The two primary sources of information for this report (which are described further within) are:

- 1. The 2019 Florida Authorizer Survey administered by FACSA in April-May 2019, and
- 2. Interviews conducted with eight active authorizers representing a range of authorizing experience and diverse communities across the state.

This report is divided into the following sections:

- 1. Florida Authorizing Context and Challenges
- 2. Overview of Priorities and Recommendations
- 3. FACSA 2019 Authorizer Survey Results
- 4. Input from Authorizer Interviews

In addition, further detail for this needs assessment is contained in the attached two appendices:

- Appendix 1: Catalog of State-Level Authorizing Resources A catalog of existing Florida statelevel model authorizing materials and professional development opportunities, with interviewed authorizers' feedback on strengths and areas for improvement.
- Appendix 2: FACSA Survey Data: 2019 Authorizer Survey (Summary & Analysis) A summary and analysis of the responses to the 2019 Authorizer Survey.

### Florida Authorizing Context and Challenges<sup>1</sup>

Florida's charter school law was established in 1996. In Florida, only local school districts may authorize charter schools. All 67 Florida school districts are potential authorizers. Currently, there are 657 charter schools in 46 school districts serving 313,586 students in Florida. If charter applicants are initially denied by their district, they may appeal to the State Board of Education; the Appeals Commission is their preliminary step. All non-renewals and terminations go to an Administrative Law Judge. The size of authorizers' portfolios runs the gamut from one charter school in many small and rural districts to 131

<sup>&</sup>lt;sup>1</sup> Some information in this section is adapted from the Tri-State Alliance's federal CSP proposal, pp. 6-14, with updates from FACSA.

charter schools in Miami-Dade County. (These numbers could vary slightly due to school terminations and new school openings in 2019.) Other larger authorizers in the state include Broward, Orange, Palm Beach, Hillsborough, and Duval counties.

FACSA was created in 2003 and incorporated in 2007. Its mission is to collaboratively equip districts with professional standards and best practices to authorize and support excellence in chartering for all students. It now has 64 members representing 27 district authorizers, and 71% of active Florida authorizers are members. FACSA regularly partners with the Florida Department of Education (FLDOE or DOE), the Florida Consortium of Charter Schools, and the Florida Alliance for Charter Schools as well as national organizations such as the National Association of Charter School Authorizers (NACSA) and Charter Board Partners. FACSA members have been instrumental in developing:

- Best practices for authorizing;
- Principles and standards for quality authorizing, tailored to Florida's context;
- Improved state model documents, including the charter school/authorizer contract, the charter school application, and the application review template;
- Formal documents for contract renewals;
- Opening school checklist and procedures;
- Closure checklists and procedures; and
- A website with member-only resources for authorizers who are FACSA members.

Florida has a very large and continually growing charter school sector dominated by management company-operated schools and dispersed across dozens of districts throughout the state. In addition to 16 school districts that oversee 10 or more charter schools, Florida also has 21 districts that are small authorizers, overseeing only one to three charter schools.

The following state conditions present ongoing challenges to the quality of Florida's charter school sector, and the development and continued growth of authorizing capacity and expertise within Florida authorizer offices:

- <u>A highly politicized charter school sector and state policy environment.</u> Florida has a powerful charter school operators' lobby that exercises strong advocacy at the state level. In this environment, authorizers do not have much discretionary latitude. Statutorily mandated models, documents, and tools that dictate and limit many authorizer practices have become the norm, and authorizers have very limited ability to improve upon these or develop new model tools.
- <u>Understaffed authorizers</u>. Florida's school district offices, regardless of their size, are often inadequately staffed for charter authorizing, with authorizing added to the responsibilities of a staff member who already has a full plate of other responsibilities.
- <u>Geographic dispersion</u>. Florida is a large state, and geographic distance prevents some authorizers from regular participation in in-person meetings and professional development opportunities offered by FACSA and FLDOE, which are usually offered in a central location in the state. FACSA's offerings are so valuable and necessary that many authorizers do travel from around the state to attend meetings each month, but not everyone who wishes to can do so.

Florida also shares challenges common in other district-led chartering states, which are well-articulated in the Tri-State Alliance's federal CSP proposal:<sup>2</sup>

Multiple challenges can block the implementation of strong authorizing practices or undermine previously strong practices. These include: the absence of established policies and procedures, frequent turnover in school boards or authorizing staff, inadequate staff resources, infrequent charter applications, and politicized public debates.

Authorizers with small charter portfolios are unlikely to have the capacity to implement the recommended practices that require comprehensive staff expertise in multiple substantive areas. They are unlikely to have a designated liaison, or if a person is assigned, it is often a fractional responsibility, with districts allocating as little as .1 FTE to the authorizing function. In these districts, there is often neither institutional knowledge or policy, nor a staff member with the knowledge to handle important authorizing functions. In many districts, when a charter applicant applies for a charter, the district has literally never received an application before, or no one who is currently employed by the district was on board the last time an application was reviewed.

Meanwhile, Florida's charter school law requires an authorizer to design and execute a charter application review and decision process within 90 days of receiving a charter application, which is especially challenging for new or inexperienced authorizers that have no well-practiced procedures in place. Without a merit-based, technically sophisticated approach to charter application review, too many districts fall back on ad-hoc procedures that do not reflect best practice and can become highly politicized. District authorizers that are understaffed or new to this work are also usually unable to adequately probe the capacity of a charter applicant's governing board or conduct due diligence regarding operators with multiple schools. Any and all of these circumstances can result in the approval of weak applicants or the denial of strong proposals.

## **Overview of Priorities and Recommendations**

Following is an overview of the top priorities and recommendations for both model materials and other forms of authorizer assistance identified through the 2019 Authorizer Survey and authorizer interviews. These priorities and recommendations are detailed further within this report.

A few key takeaways:

- Florida district authorizers seek a variety of further model materials and professional development in essential areas of authorizing responsibility (e.g., annual reviews and reporting, renewal evaluation).
- This project should focus some attention on increasing understanding and implementation of <u>Essential Practices for quality charter authorizing</u>, through both model materials and authorizer assistance, to encourage universal adoption and build consistent capacity for basic quality authorizing practices by Florida district authorizers.
- Authorizers need state-level policy and advocacy on behalf of quality charter schools and quality authorizing to effect policy changes that would strengthen the state's charter sector.

<sup>&</sup>lt;sup>2</sup> Adapted from the Tri-State Alliance federal CSP proposal, pp. 9-10.

**Note**: The first five sets of priorities set forth below – which all report results from the 2019 Survey – are simply a presentation of the top five ranked priorities in response to the given question on the 2019 Authorizer Survey administered in Florida. The priorities or topics listed are the top-ranked survey items verbatim, taken directly from the survey, without interpretation or editing. (See Appendix 2 for complete survey summary results.) There is no additional detail regarding survey-identified priorities because these priorities are simply the survey respondents' top-ranked choices on the survey, not information from the authorizer interviews. Discussion by FACSA members will be necessary to understand better the priorities identified and to determine what FACSA should undertake for this project.

Top Priorities for Model Materials (top-ranked items in 2019 Survey) – see Table 1

- 1. Annual review material/rubric
- 2. Annual review report to charter schools
- 3. Opening checklist
- 4. "Year Zero" material (activities after charter approval and before school opening)
- 5. Renewal standards

## Top Priorities for Authorizer Assistance (top-ranked items in 2019 Survey) – see Table 2

- 1. Regular face-to-face meetings with my peers and experts
- 2. An online archive of materials
- 3. State-level policy and advocacy on behalf of quality charter school authorizing
- 4. Opportunities to visit other authorizers and learn about their practices and policies
- 5. An online community where authorizers can post questions and share information/ideas with peers

## Most Urgent Assistance Needs in Charter Authorizing (top-ranked items in 2019 Survey) – see Table 3

- 1. Charter oversight and monitoring
- 2. Understanding charter legislation
- 3. Charter evaluation and renewal decisions
- 4. Ensuring all students in our community have full access and appropriate services
- 5. Special Education/ESE
- 6. Activities after charter approval and before school opening (Year Zero)

## Essential Practices Implementation (identified in 2019 Survey) – see Table 4

This project should provide model materials and assistance to increase Florida authorizer implementation of the following essential authorizing practices, which are currently implemented by less than 80% of district authorizers who responded to the 2019 Survey:

- 1. Mission: Have a published and available mission for quality authorizing.
- 2. Staff: Have staff assigned to authorizing within the organization or by contract.
- 3. Application Timeline: Publish application timelines and materials.
- 4. 5-Year Term Length: Grant initial charter terms of five years only.
- 5. Financial Audit: Require and/or examine annual, independent financial audits of its charter schools.
- 6. Renewal Criteria: Have established renewal criteria.
- 7. Revocation Criteria: Have established revocation criteria.
- **8. Annual Report**: Provide an annual report to each school on its performance.

**Top Priorities to Improve Access, Services, and Outcomes for Students with Disabilities in Charter Schools** (top-ranked items in 2019 Survey) – see Table 5

- 1. Mechanisms to help authorizers intervene when charter schools fail to fulfill obligations to serve students with disabilities
- 2. Willingness of charter operators to actively engage and recruit students with disabilities
- 3. Clarity in interpreting state and federal policy as it applies to charter schools
- 4. Willingness of charter operators to expand the scope of services currently offered to students with disabilities
- 5. Communication and clarity about the rights of students with disabilities during outreach, recruitment, enrollment, and admissions

Additional Recommendations for Model Materials (suggested in authorizer interviews - *unranked*) – see Table 7

- State Model Performance Framework
- 5-year high-stakes review protocol
- Step-by-step guide for new authorizers
- Guidance on implementing state charter statute and rules
- Improved State Model Application
- Improved State Model Application Evaluation Instrument
- Guidance on application denials (both substantive and procedural grounds for denial)
- Applicant capacity interview guidance and protocol
- Guidance and training in conducting due diligence on education management providers

## **Recommendations for Improving Access, Services, and Outcomes for Students with Disabilities and English Language Learners (ELLs)** (suggested in authorizer interviews - *unranked*) – see Table 8

- Joint training on ESE and ELL obligations, provided by DOE to authorizers and charter school operators together
- Technical assistance provided by DOE to both authorizers and charter operators to ensure clear understanding of the scope of ESE services (Inclusion, Resource, Separate Class/School) and the related responsibilities of both authorizers and operators

# Additional Recommendations for Authorizer Assistance (suggested in authorizer interviews - unranked) – see Table 10

- Capacity interview training
- Guidance and training in conducting due diligence on education management providers
- Florida Principles & Standards training
- Site visit observation training
- Improved DOE training for district finance offices
- Technical assistance from DOE on the implementation of new school safety laws and student mental health requirements, delineating authorizer and operator responsibilities
- More advanced PD for experienced authorizers

Following is more detail on all of these priorities and recommendations resulting from the 2019 Survey and authorizer interviews.

### FACSA 2019 Authorizer Survey Results

In April-May 2019, FACSA administered an online survey to district authorizers throughout Florida to assess their needs and priorities for statewide model authorizing materials and other authorizer assistance that this project could potentially provide. Thirty-four (34) district staff members representing 19 school districts throughout the state responded to the survey. Tables 1-3 below show the top-ranked priorities for model authorizing materials, authorizer assistance, and "most urgent assistance needs related to charter authorizing" identified by survey respondents. The priority rankings were determined by calculating the weighted average of authorizers' rankings of each item in the survey. Respondents also had the opportunity to write in additional priorities not listed. (For a complete summary and analysis of results from the 2019 Survey, see Appendix 2.)

### Table 1. Survey Results - Top Priorities for Model Materials

Please rank the top 5 (you may rank all items if you prefer) of the most useful types of model materials for your district's needs, with 1 being the most useful.			
1.	Annual review material/rubric	1	
2.	Annual review report to charter schools	2	
3.	Opening checklist	3	
4.	"Year Zero" material (activities after charter approval and before school opening)	4	
5.	Renewal standards	5	
		6	
6.	Renewal/nonrenewal review material		
7.	Revised model contract	7	
8.	Model board resolution for best practices	8	
9.	Expansion/replication application	9 (tied)	
10.	Expansion/replication rubric	9 (tied)	

### Table 2. Survey Results – Top Priorities for Authorizer Assistance

Please rank the top 5 (you may rank all items if you prefer) of the most helpful types of authorizer assistance, with 1 being the most helpful.				
1.	Regular face-to-face meetings with my peers and experts	1		
2.	An online archive of materials	2		
3.	State-level policy and advocacy on behalf of quality charter school authorizing	3		
4.	Opportunities to visit other authorizers and learn about their practices and policies	4		
5.	An online community where authorizers can post questions and share information/ideas with peers	5		
6.	Informally connecting me to a network of peers	6		
7.	Regular updates and newsletters with news and developments in the field	7		
8.	Webinars and other remote training opportunities	8		

9. Training and "bootcamps" fo to charter school oversight	r new district staff after they are assigned 9	
10. Communication work to help quality charter school author	the public and policymakers understand 10 izing	
11. Evaluations of my district's a	uthorizing policies and practices 11	
12. Mentoring with a colleague v	vho partners with me one-on-one 12	

### Table 3. Most Urgent Assistance Needs in Charter Authorizing

Please rank the top 5 (you may rank all items if you prefer) of your district's most urgent assistance needs related to charter authorizing, with 1 being the most urgent.				
1.	Charter oversight and monitoring	1		
2.	Understanding charter legislation	2		
3.	Charter evaluation and renewal decisions	3 (tied)		
4.	Ensuring all students in our community have full access and appropriate services	3 (tied)		
5.	Special Education/ESE	4		
6.	Activities after charter approval and before school opening (Year Zero)	5		
7.	Charter applications	6		
8.	Charter replication and expansion	7		
9.	Charter contracting	8		
10.	Internal coordination within district offices	9		
11. Admissions and enrollment 1				
12.	Improving district-charter relations	10 (tied)		
13. Services for English Language Learners				

## **Essential Practices for Quality Authorizing – Implementation Rates**

The 2019 Authorizer Survey included a section to assess responding authorizers' rates of implementation of the <u>12 Essential Practices</u> for quality charter authorizing, as defined by NACSA.<sup>3</sup> These 12 Essential Practices are:

- **1. Mission**: Have a published and available mission for quality authorizing.
- 2. Staff: Have staff assigned to authorizing within the organization or by contract.
- **3. Contracts**: Sign a contract with each school.
- **4. Application Criteria**: Have established, documented criteria for the evaluation of charter applications.
- 5. Application Timeline: Publish application timelines and materials.
- 6. Application Interview: Interview all qualified charter applicants.
- **7. External Expert Panel**: Use expert panels that include external members to review charter applications.
- **8. 5-Year Term Length**: Grant initial charter terms of five years only.

<sup>&</sup>lt;sup>3</sup> See <u>https://www.qualitycharters.org/for-authorizers/12-essential-practices/</u>.

- **9.** Financial Audit: Require and/or examine annual, independent financial audits of its charter schools.
- **10. Renewal Criteria**: Have established renewal criteria.
- **11. Revocation Criteria**: Have established revocation criteria.
- **12.** Annual Report: Provide an annual report to each school on its performance.

See the <u>12 Essential Practices</u> and <u>"The Essential Practices: Why They Matter"</u> for more explanation of each of these practices.

Nineteen (19) districts responded to this section of the survey. The table below summarizes the survey results for Essential Practices implementation, in descending order of implementation by the responding districts:

	Application Criteria	Performance Contract	Interview	Expert Panel	Application Timeline	5-Year Initial Term	Financial Audit	Renewal Criteria	Authorizing Staff	Revocation Criteria	Published Mission	Annual Report
<pre># of Districts Imeplementing</pre>	19	19	18	16	15	14	14	14	14	11	8	7
Rate	100%	100%	95%	84%	79%	74%	74%	74%	74%	58%	42%	37%

### Table 4. Rate of Implementation of Essential Practices

Of concern are the lower rates of implementation (under 80% of responding districts, as highlighted in the above table) for all but four Essential Practices. <u>These Essential Practices that have been adopted by</u> <u>less than 80% of responding authorizers merit attention in this project, through both model materials</u> <u>and authorizer assistance, to encourage universal adoption by Florida district authorizers and build</u> <u>consistent capacity for basic quality authorizing practices throughout the state</u>.

## Table 5. Priorities to Improve Access, Services, and Outcomes for Students with Disabilities in Charter Schools

The 2019 Authorizer Survey included a section to assess authorizers' priorities for actions to improve access, services, and outcomes for students with disabilities in charter schools. Table 5 below shows the types of actions or activities that responding authorizers identified as highest priority in this area. <u>This subject will be examined and detailed in a separate study and report conducted for the Tri-State Alliance</u>, so is not discussed in detail in this report.

Please rank the top 5 items that could improve access, services, and outcomes for students with disabilities in charter schools in your district, with 1 being the item that could most improve outcomes.					
1.	Mechanisms to help authorizers intervene when charter schools fail to fulfill obligations to serve students with disabilities	1			
2.	Willingness of charter operators to actively engage and recruit students with disabilities	2			
3.	Clarity in interpreting state and federal policy as it applies to charter schools	3			
4.	Willingness of charter operators to expand the scope of services currently offered to students with disabilities	4			
5.	Communication and clarity about the rights of students with disabilities during outreach, recruitment, enrollment, and admissions	5			
6.	Education of charter school operators on the basics of special education	6			
7.	Training for charter school boards and other stakeholders on obligations to students with disabilities in public schools	7			
8.	Improved oversight of special education compliance	8			
9.	Changing state policy, such as redefining charter schools as their own Local Education Agency (LEA) for special education purposes	9			
10.	Consideration of special education during renewal or revocation procedures	10			
11.	Access to broader pool of professionals able to provide related services	11			
12.	Funding and programming support for students with severe needs	12			
13.	More attention to special education during the review of charter applications	13			
14.	Improved relationships between charter schools and the district	14			

#### Input from Authorizer Interviews

To augment authorizer input obtained from the 2019 Authorizer Survey, we interviewed eight Florida district authorizers to obtain deeper perspectives on the needs of diverse authorizers throughout the state. The district personnel interviewed represent a wide range of chartering experience including both new and veteran authorizers, as well as small-scale to large-scale authorizers. Florida county school districts tend to cover large areas with large, diverse student populations – a single county can include urban, suburban, and rural communities, so the authorizers interviewed collectively oversee schools in a range of environments and serving diverse student demographics.

In the interviews, we did not ask authorizers to rank priorities in response to a given list (as in the survey), but simply to offer their top recommendations for both statewide **model authorizing materials** and other **authorizer assistance** (e.g., professional development, mentoring). As a result, some of their recommendations naturally echoed items listed in the survey (e.g., "revised model contract"), while other suggestions were not reflected in the survey and are thus additional ideas to consider. The following tables (6-10) summarize recommendations offered by authorizers in the interviews – separated into recommendations that correspond with priorities identified through the survey, and those that were not included in the survey.

## Table 6. Priority Model Materials Recommended by Authorizers Interviewed

## PRIORITY MODEL MATERIALS (corresponding to top priorities identified in survey)

The authorizers interviewed agreed with many priorities for statewide model materials as identified in the 2019 Survey results. Below are thoughts or comments they provided that relate to priorities identified through the survey.

Resource	Description/Comments
Annual review material/rubric	Authorizers interviewed agreed that state model tools and best practices for monitoring and oversight are a top priority. Experienced authorizers have developed their own tools such as site visit protocols, but agree that state models would be desirable. Tools for differentiated oversight or differentiated compliance monitoring would be useful. An authorizer recommended developing a model site visit protocol and a bank of rigorous site visit observation tools to choose from (not a single state tool) with accompanying training to implement the protocol and tools.
Annual review report to charter schools	Authorizers would like a standard format for annually reporting performance to each charter school in their portfolio.
Opening checklist	New authorizers would like a state model checklist and guidance for authorizers for things that are due from charter schools and deadlines (e.g., projected enrollment). The checklist should cover more than the pre-opening context; it should cover all key requirements and deadlines an authorizer should know.
"Year Zero" material (activities after charter approval and before school opening)	New authorizers would like a state model checklist and guidance for authorizers for things that are due from charter schools and deadlines (e.g., projected enrollment). The checklist should cover more than the pre-opening context; it should cover all key requirements and deadlines an authorizer should know.
Renewal standards	Authorizers highlighted the need for a <b>model performance framework</b> – providing <b>academic, financial, and organizational measures and standards</b> – that is embedded in the state model charter contract and meaningful, credible, and enforceable for both parties. (See Table 7 below) A statewide performance framework would inform state renewal standards.
Renewal/nonrenewal review material	Authorizers recommend the development of a suite of model renewal resources, such as: a) a state model renewal application and renewal process, so authorizers aren't accused of overstepping when they develop their own; b) a renewal evaluation rubric tied to a state model performance framework (also recommended – see Table 7 below); c) a guide to best practices in the renewal process.

	Experienced authorizers with well-developed renewal procedures aren't seeking this as much, but less experienced authorizers engaging in the renewal process for the first time would find a state model or guidance useful to help justify accountability decisions. To date, authorizers have been able to follow or adapt renewal process models and tools from experienced Florida authorizers, but they would benefit from a state model for guidance.
Revised model contract - renewal contract needed	Authorizers spoke to the need for a state-provided <b>standard renewal contract</b> , which the state is required to provide by statute.

## Table 7. Additional Recommendations for Model Materials

ADDITIONAL RECOMMENDATIONS FOR MODEL MATERIALS						
In addition to the above, authorizers interviewed suggested the following model materials that were not on the 2019 Survey list of items.						
Resource	Description/Comments					
Step-by-step guide for new authorizers	A step-by-step guide for new authorizers would be a useful orientation tool. This could be a topical Powerpoint available online, giving new authorizers the "big picture" and framework for essential authorizing responsibilities and state requirements, with links to more information and resources for each topic.					
State Model Performance Framework	Authorizers highlighted the need for a <b>model performance framework</b> – providing <b>academic, financial, and organizational measures and standards</b> – embedded in the state model charter contract and meaningful, credible, and enforceable for both parties. Oversight of the performance framework must be manageable for a one-person authorizing office – keep small, understaffed authorizers in mind.					
5-year high-stakes review protocol	Authorizers would like a model 5-year high-stakes site visit/review protocol for schools that have 15-year charters.					
Guidance on implementing statute and rules	Clarifying guidance on implementing the Florida charter schools statute and rules would be helpful, such as clarifying language on how some rules are supposed to be implemented, identifying authorizer responsibilities vs. charter operator responsibilities. This is a significant request in light of recent legislation.					
Improved State Model Application	Authorizers recommended several improvements for the State Model Application:					
	<ol> <li><u>School location</u>: Should require applicants to provide a plan for their location or identify an actual location (current application wording is too vague). Should require applicants to identify location options (options A, B, C) with exact addresses, so we know the community(ies) they are targeting.</li> <li><u>Governance</u>: Should require majority in-district residents on governing board (right now there is no requirement). Application should also require</li> </ol>					

	<ul> <li>disclosure of proposed board members' legal and ethical histories (e.g., professional licensure and affiliations, or loss thereof).</li> <li>3) <u>School leadership</u>: Should require applicants to identify their proposed school leader/principal.</li> <li>4) <u>Application Deadline</u>: Would like an application deadline set by the State so authorizers have a predictable annual cycle, rather than just the statemandated timeline that is triggered whenever an application arrives. The unpredictability of the current timeline may impede an authorizer's existing work and diminish the quality of charter school options for children in Florida.</li> </ul>
Improved State Model Application Evaluation Instrument	<ul> <li>Needs some updates and revisions. Authorizers' recommendations for improving the Model Application Evaluation Instrument and its usage:</li> <li>1) Strengthen its content to reflect stronger application requirements as recommended above.</li> <li>2) Content should (by the nature of what it is probing/scrutinizing) guide authorizers in conducting due diligence on proposed board members, school leaders, and management entities.</li> <li>3) Provide clearer guidance and descriptors for what meets/does not meet/partially meets each standard - instrument currently allows too much subjectivity.</li> <li>4) Similarly, provide exemplars for "high standards" for approving charter applicants - what does that mean?</li> <li>5) The rubric should quantify how an applicant is meeting (or not meeting) each particular standard.</li> <li>6) Provide technical assistance on the implementation of revised instruments.</li> </ul>
Guidance on application denials	Statutory or rule guidance on both substantive and procedural grounds for denying a charter application are necessary, to provide defensible rationales for the denial of a charter school application. In Florida's charter environment, some authorizers are approving schools "left and right" not because the applications are all meritorious and meet high standards, but because denial standards are grey.
Applicant capacity interview guidance and protocol	Authorizers highlighted a need for best practices guidance and a protocol for conducting capacity interviews. There should be separate guidance for authorizers and charter applicants, respectively. Guidance for applicants should prepare them to give substantive responses and understand how they will be evaluated, and should state who may/must – and who may not – represent the applicant in the interview. An interview protocol for authorizers should provide a structure and interview outcomes, and include recommended questions for each section of the Model Application (while the questions can be modified as appropriate for particular applicants). This should be accompanied by capacity interview training (noted in Table 10).

Due diligence guidance and training	Authorizers would like guidance and training to strengthen their due diligence on education management providers. Ideally this could take the form of written guidance along with practical training.
School safety and security policies and procedures	Authorizers would like clear guidance (with accompanying training/technical assistance – See Table 10) on the compliance responsibilities and procedures for school safety and security for both authorizers and charter school operators.

# Table 8. Improving Access, Services, and Outcomes for Students with Disabilities and English LanguageLearners (ELLs)

### IMPROVING ACCESS, SERVICES, AND OUTCOMES FOR STUDENTS WITH DISABILITIES AND ELLS

Authorizers interviewed recommended the following to help authorizers improve access, services, and outcomes for students with disabilities and English learners:

Action	Description/Comments
Joint training on ESE and ELL obligations, provided by DOE to authorizers and charter schools together	Authorizers recommend that DOE provide ESE & ELL trainings to authorizers and schools alike. Joint training covering state and federal obligations of both parties would provide fuller understanding and ensure both authorizers and schools receive the same information and guidance on their respective responsibilities and requirements. This would be appropriate and useful training for DOE to offer, and could be a module that is recorded and made available online every year. Before launching a training, DOE should conduct a pilot training with a small group of authorizers and charter schools to ensure the training answers common questions and makes information as useful as possible.
ESE technical assistance by DOE to authorizers and charter operators	In addition to joint training, related ESE technical assistance provided by DOE to both authorizers and charter operators should ensure clear understanding of the scope of ESE services (Inclusion, Resource, Separate Class/School) and the related responsibilities of both authorizers and operators.

### Table 9. Priorities for Authorizer Assistance

## PRIORITIES FOR AUTHORIZER ASSISTANCE (corresponding to top priorities identified in survey)

The authorizers interviewed echoed many of the priorities for authorizer assistance as identified in the 2019 Survey results. Below are thoughts or comments they provided that relate to priorities identified through the survey.

Type of Assistance Description/Comments	
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Regular face-to-face meetings with my peers and experts	FACSA's monthly meetings and workshops are tremendously helpful and timely, and great opportunities for peer learning. The authorizers interviewed generally are able to travel to FACSA meetings and find them a necessary and worthwhile investment of time. As one new authorizer put it: "FACSA is my lifeline. My district allows me to go to the meetings because this is where I get the information I need to do my job." To make FACSA trainings even better: 1) Build in more time for certain topics, and for Q&A and scenarios. 2) Need more trainings to differentiate between experienced vs. newer authorizers, and to cover advanced topics for experienced authorizers.
State-level policy and advocacy on behalf of quality charter school authorizing	Authorizers' recommendations that would strengthen charter school quality and accountability usually are not adopted at the state level (by the legislature or DOE). Effective state-level policy and advocacy on behalf of quality authorizing and quality charter schools are needed to strengthen Florida's charter sector.
Opportunities to visit other authorizers and learn about their practices and policies	See Tri-State Networking table below.
An online community where authorizers can post questions and share information/ideas with peers	Authorizers interviewed would love to have an online forum with archived, searchable Q&A and discussions.
Trainings and "bootcamps" for new district staff after they are assigned to charter school oversight	Authorizers recommended offering "bootcamp" for district staff newly assigned to charter authorizing. Include state expectations for authorizers. See also " <b>2-3 day authorizing institute</b> " in Table 10 below.
	Send consultants to meet with and provide orientation to new authorizers, if a new authorizer can't attend a bootcamp.
Webinars and other remote training opportunities	Authorizers welcome webinars and other remote training opportunities when they can't travel to the live training location. Use technology to enable remote participation. Record and archive the trainings for future access.
	Webinars can also be useful for specialized topics that don't affect as many authorizers.
Informally connecting me to a network of peers	This need would be met by many types of authorizer assistance.
Mentoring with a colleague who partners with me one-on-one	Facilitating mentoring partnerships is a very high-value service that FACSA already provides. New or less-experienced authorizers find this tremendously helpful.

## Table 10. Additional Recommendations for Authorizer Assistance

### ADDITIONAL RECOMMENDATIONS FOR AUTHORIZER ASSISTANCE

In addition to the above, authorizers interviewed recommended the following types of authorizer assistance that were not on the 2019 Survey list of items.

Type of Assistance	Description/Comments
Capacity interview training	Authorizers highlighted a need for rigorous applicant capacity interview training. The training offered by DOE/NACSA in February 2019 was weak and provided little new learning.
Due diligence guidance and training	Authorizers would like guidance and training to strengthen their due diligence on education management providers. Ideally this could take the form of written guidance along with practical training.
Florida Principles & Standards training	Florida has its own Principles & Standards for Quality Charter School Authorizing. Authorizers have requested assistance with the implementation of the Florida Principles & Standards, to develop consistent systems and practices throughout the state.
Site visit observation training	Authorizers recommended developing a model site visit protocol and a bank of site visit observation tools to choose from (not a single state tool) with accompanying PD to implement the protocol and tools. Some authorizers would find this immensely helpful.
Improved DOE training for district finance offices	An authorizer recommended this improvement for DOE's training for district finance offices in using the finance/audit template: Explain the formulas behind it. Plan the training in collaboration with district finance directors, because most district offices don't understand the formulas behind the template and don't know how to use it appropriately.
Training/TA on school safety and security policies and procedures	(As noted above in Table 7) Authorizers would like clear guidance and training/technical assistance from DOE on the implementation of new school safety laws and student mental health requirements, delineating authorizer and operator responsibilities for compliance.
Advanced PD for experienced authorizers	Experienced authorizers who have essential practices and tools developed would welcome training or assistance in more advanced authorizing issues. PD in differentiated oversight based on school performance is one topic that could be offered to experienced authorizers.

Lastly, authorizers interviewed are keen to exchange best practices with and learn from their peers in California and Colorado through the Tri-State Alliance. They acknowledge, as authorizers in all three states do, some limitations in cross-state sharing due to their different state laws, policies, and political environments. That said, they would like to benefit from an active network of engaged district authorizers that does more than just disseminate information. They all have busy schedules but, with sufficient notice, will make time to participate in meaningful, well-targeted cross-state learning and sharing.

### Table 11. Suggestions for Tri-State Networking and Learning

### SUGGESTIONS FOR TRI-STATE NETWORKING AND LEARNING (with California and Colorado)

Authorizers interviewed offered the following thoughts and ideas for effective activation of the Tri-State network.

Activity	Description/Comments
Tri-State network meetings	<ul> <li>Florida authorizers are eager to learn best practices from other states.</li> <li>They would love to attend national meetings in person and get to share each other's authorizing challenges as well as the things each state is proud of. A conference covering various topics would be useful.</li> <li>If attending in person isn't possible for some, options for participating virtually would be desirable. Use technology to allow remote participation.</li> <li>Intermittently throughout the year (maybe every 9 weeks), a topical conference/video call would be great.</li> </ul>
Visits to exemplary schools	Some authorizers would love to visit and learn from exemplary schools in other states, which could be offered as an add-on to a Tri-State meeting in another state.