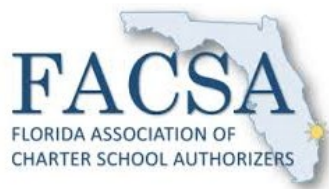


Strengthening Charter School Authorizing to Improve Access and Services for Students with Disabilities in Florida

Phase 2: Action Plan

August 2019



Introduction

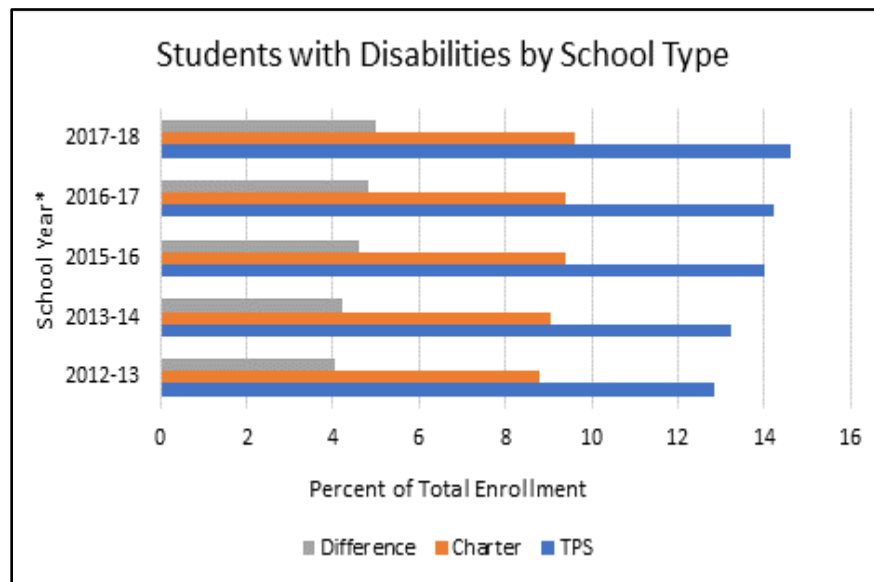
Florida, represented by the Florida Association of Charter School Authorizers (FACSA), is a member of the Tri-State Alliance for Improving District-Led Charter Authorizing (Tri-State Alliance) along with Colorado and California. The Tri-State Alliance is dedicated to improving the quality of the charter school sector by creating and disseminating replicable best-practice resources to support effective authorizing and charter school oversight by school districts, including small/rural authorizers.

Phase 1 of this grant was the completion of a needs assessment of barriers that may prevent authorizers from ensuring that their charter schools adequately serve students with disabilities. The purpose of Phase 2 is to produce a plan to address the barriers identified in Phase 1. In accordance with the statement of work, the plan will be shared with target stakeholders, with feedback obtained prior to implementation. Implementation will be evaluated through data-driven analysis of strategies, activities, and milestone achievement. Specific requirements for the Phase 2 plan include a SWOT evaluation of target authorizers and an action plan with measurable goals addressing the SWOT evaluation and including the professional development/training needs of the target authorizers.

FACSA contracted with the Florida Special Education Collaborative (FLSpEC) to complete Phase 1 and Phase 2. FLSpEC is a non-profit organization established to support charter schools in the development and implementation of robust and adaptable exceptional student education programs fostering equity and access to educational choice for all of Florida's students.

Background

For the overarching purpose of this grant, the gap between enrollment of students with disabilities in charter schools compared to traditional public schools serves as a primary indicator of the extent to which charter schools within an authorizer's portfolio are adequately and equitably serving students with disabilities. The overall state rate for students with disabilities is 14.1 percent, representing 9.6 percent of charter school students and 14.6 percent of traditional public school students. This reflects a gap of 5 percent. At the national level, a recent analysis of federal data by the National Center for Special Education in Charter Schools indicated that students with disabilities made up 10.6 percent of the charter school population, compared to 12.5 percent of the population for traditional public



schools, reflecting a gap of just under 2 percent (in 2013-14, based the most recent national data available).¹ The table illustrates the trend of an increasing gap within Florida.

Target Authorizers

During the 2017-18 school year there were 655 charter schools in 48 districts serving over 295,000 students in Florida. The majority of charter schools are in the southern and central portions of the state in districts considered large (40,000 to 99,999 students) or very large (>100,000 students). In addition, 37 charter schools are located in 17 of the 38 small/rural districts (< 20,000 students), primarily in the northwest/panhandle portion of the state. In all, fewer than 6 percent of Florida’s 655 charter schools are located in small/rural districts.

As part of this grant, FACSA sought to identify target authorizers on which to focus its attention. Based on the demographics of the state, the large variation in the number and percent of students with disabilities across districts, and the relatively small number of districts in comparison to the total state population, the decision was made to target the 48 district authorizers that currently have charter schools. The surveys disseminated during Phase 1 were sent to all 48 of the target authorizers, and interviewees were selected to capture a range of districts by size and percent of disabilities. Information gleaned through Phase 1 is summarized in the SWOT analysis below and is used as the basis for developing an action plan focused on the target authorizers.

SWOT Analysis

For the purposes of this SWOT analysis:

- Strengths reflect resources or attributes currently available through the target authorizers or FACSA that may be helpful in achieving the goals of this grant.
- Weaknesses reflect improvements that could be made, either by authorizers or FACSA.
- Opportunities reflect outside entities or resources that may be accessed to help achieve the goal.
- Threats reflect hazards or known weaknesses of outside entities that could hinder progress toward the goal.

INTERNAL FACTORS	
STRENGTHS (+)	WEAKNESSES (-)
<ul style="list-style-type: none"> • Authorizers consistently express commitment to ensuring students with disabilities have equitable access to charter schools. • All districts designate staff members as charter school contacts and ESE contacts, providing a framework for coordination of efforts. • Exemplar charter schools throughout the state provide opportunities to share positive practices. 	<ul style="list-style-type: none"> • Messaging from district staff to charter schools is not always consistent within each district. • The current charter application process enables authorizers to probe for applicants’ understanding of ESE obligations, but even groups who present themselves well during the interview process often fail to implement an appropriate array of ESE services. • Lack of clear guidance regarding specific actions that can or should be taken to increase

¹https://static1.squarespace.com/static/52feb326e4b069fc72abb0c8/t/5a8d7e69419202fa34e8f459/1519222386373/280272+NCSECS+Full+Report_WEB.pdf

<ul style="list-style-type: none"> • Authorizer processes and systems currently available or in use provide a foundation from which to build (e.g., ESE monitoring; renewal procedures). • At least one authorizer has developed ESE PD specific to the charter school environment. This can serve as a foundation for PD developed for a larger statewide audience. 	<p>enrollment of students with disabilities (absent a clear violation of nondiscrimination law).</p>
--	--

EXTERNAL FACTORS	
OPPORTUNITIES (+)	THREATS (-)
<ul style="list-style-type: none"> • Reports of SWD enrollment disaggregated by district and, when applicable, CMO/EMO will allow authorizers to: <ul style="list-style-type: none"> ○ Focus efforts on schools with the greatest opportunity for improvement ○ Identify promising practices from schools with enrollment most reflective of the district as a whole • Requesting and obtaining formal guidance from FLDOE (e.g., memos, TAPs) regarding students with disabilities and charter schools can give weight and authority to authorizers' efforts. • In addition to authorizer representatives, soliciting input from stakeholders such as charter school boards, CMOs/EMOs, or FLDOE may serve to elevate this topic across the charter school landscape and foster a broader base of support and action. • FLDOE is in the process of developing the Florida Standard Charter Renewal Contract (webinar to be conducted 8/29/19), providing an opportunity to shape the content. 	<ul style="list-style-type: none"> • Many charter applicants and existing charter schools lack a realistic understanding of the type and amount of ESE services and supports a typical public school is expected to provide. • Limitations on FLDOE's ability or willingness to timely provide formal written guidance that goes beyond language already in statute may limit authorizers' ability to garner buy-in from charter schools. • Some sections of the Florida Standard Charter Contract contain areas of ambiguity that leave specific obligations or expectations open to interpretation. • Lack of clear guidance to districts and charter schools regarding the extent to which allowances agreed upon in original charter applications (e.g., list of ESE services the school will provide) can be over-ridden during the renewal process to align with current expectations. • Unlike the traditional public school, enrollment at individual charter schools is capped and many charter schools maintain wait lists. The only way students may enroll in a charter school is through the application process based on seats available, decreasing the likelihood that a parent of a child with a disability can automatically enroll their child in a selected charter school. • Common misunderstanding (at large) that charter schools do not have to serve most students with disabilities.

Prioritization Process

As described in the Phase 1 Needs Assessment, information gleaned was organized topically. Recommendations were developed for each category, with attention paid to ways in which the different stakeholder groups could contribute to the improvement process. The categories used for organizational purposes were:

- Application review and approval
- Recruitment, enrollment, and the provision of services
- District services and supports
- Technical assistance and professional development
- Oversight and monitoring
- Funding of ESE services
- State resources and support

In total, 36 recommendations were made across the seven topical areas, with specific consideration of actions that might be taken by FACSA, by district authorizers across the state, by the charter schools themselves, and by the Florida Department of Education (FLDOE) Office of Independent Education and Parental Choice, the office within the state education agency tasked with providing information and assistance to promote successful outcomes for students, families, institutions and communities through the school choice options available within the state.

The FACSA Equity Committee began the action plan development process by prioritizing the recommendations through the following process:

- Those recommendations most directly under the control of FACSA and the district authorizers were identified from the original list of 36. This resulted in a shorter list of 20 recommended actions (9 related to FACSA and 11 related to district authorizers).
- The 20 recommendations were judged on the basis of (a) priority (i.e., how important or potentially impactful the action was likely to be with regard to achieving the grant goals) and (b) effort (i.e., how time and resource intensive the action was likely to be, given the timeline for the grant).
- A scale of 1 (least) to 5 (most) was applied to assess priority and effort for each of the 20 recommendations. Based on this assessment, the FACSA Equity Committee selected nine (9) recommendations to be the focus of the action plan.
- The FACSA Equity Committee intends for the remaining recommendations to be incorporated into a subsequent action plan to be implemented at the completion of this grant cycle.

Based on the identified priorities, the attached action plan addresses the following:

- Identify the types of ESE services and placements that are commonly available within neighborhood schools and share this information with charter schools during the initial application process, contract renewal process, and any ESE monitoring and oversight activities it conducts.
- Adapt selected professional development offerings to highlight content of particular importance to charter schools and, as applicable, modify content so that it is more applicable to the charter school environment.

- During the charter contract negotiation process, identify areas of ambiguity that may benefit from the addition of more specific descriptions or explanations within the contract or other type of memorialized agreements or understanding between the parties regarding roles, responsibilities, and expectations related to students with disabilities.
- Utilize the capacity interview process to probe the applicants' true understanding of the charter school's ESE obligation, which could include posing hypothetical examples of real-world situations charter schools experience.
- Create and share formalized and written oversight and ESE monitoring procedures and practices designed to address issues common to charter schools as well as overall compliance. In tandem, offer training to schools and school governing authorities as needed.
- Identify and share professional development opportunities with district authorizers on an ongoing basis, serving as a conduit for communication for districts seeking support.
- Establish a system for authorizer networking or a workgroup to enable district staff responsible for authorizing and for supporting charter schools in the area of ESE to share positive practices and engage in ongoing collaboration.
- Support creation of formalized renewal procedures, processes, and decision rules/criteria and share with statewide authorizers to build consistency in evaluation of special education practices.
- Conduct an analysis of the proportion of students with disabilities enrolled in charter schools disaggregated by those enrolled in independent charters and those enrolled in schools operated by a CMO/EMO to determine if there are patterns or trends that could indicate schools with exemplar programs (e.g., higher than expected enrollment of students with disabilities) or schools with potential for concern (e.g., lower than expected enrollment of students with disabilities).

Phase 2: Action Plan

Goal:

Educate districts and other key stakeholders about districts’ ongoing authorizing and oversight responsibilities under state law as an effective way to expand options for all students, thereby improving access and services for disadvantaged students, students with disabilities, and English Learners.

Project Objectives:

- Florida will report a 15% increase in the implementation of best-practice tools that specifically support the needs of students with disabilities.
- By the end of the grant period, charter schools in Florida will close the gap in enrollment of students with disabilities between charters and traditional public schools by 66%.

Action Plan

District Authorizer Tasks						
Task	Description/ Method	Materials	Subject Matter Expert	Primary Creator/ Organizer	Timeline	Considerations/ Noted Areas of Challenge
Identify the types of ESE services and placements that are commonly available within neighborhood schools and share this information with charter schools during the initial application process, contract renewal process, and any ESE monitoring and oversight activities it conducts.	Communication/ Best Practices	TAP	TBD	TBD	Ongoing	N/A
Adapt selected professional development offerings to highlight content of particular importance to charter schools and, as applicable, modify content so that it is	Professional Development	TBD	TBD	Authorizer/ District Staff	Ongoing	N/A

District Authorizer Tasks						
Task	Description/ Method	Materials	Subject Matter Expert	Primary Creator/ Organizer	Timeline	Considerations/ Noted Areas of Challenge
more applicable to the charter school environment.						
During the charter contract negotiation process, identify areas of ambiguity that may benefit from the addition of more specific descriptions or explanations within the contract or other type of memorialized agreements or understanding between the parties regarding roles, responsibilities, and expectations related to students with disabilities.	Professional Development	TBD	TBD	Authorizer/ District Staff	Upon charter approval	Districts can add language to contracts.
Utilize the capacity interview process to probe the applicants' true understanding of the charter school's ESE obligation, which could include posing hypothetical examples of real-world situations charter schools experience.	Capacity Interview/ Workshop	TBD	TBD	TBD	Pre-application approval, post application review	Interviews are used to show applicants' deficiency.
Create and share formalized and written oversight and ESE monitoring procedures and practices designed to address issues common to charter schools as well as overall compliance. In tandem, offer training to schools and school governing authorities as needed.	Technical Assistance Memo/ Guidance Document	TBD	TBD	TBD	Ongoing	N/A

FACSA TASKS						
Task	Description/ Method	Materials	Subject Matter Expert	Primary Creator/ Organizer	Timeline	Considerations/ Noted Areas of Challenge
Identify and share professional development opportunities with district authorizers on an ongoing basis, serving as a conduit for communication for districts seeking support.	Professional Development	TBD	TBD	FLSpEC	Ongoing	Conducted at FACSA or by webinar.
Establish a system for authorizer networking or a workgroup to enable district staff responsible for authorizing and for supporting charter schools in the area of ESE to share positive practices and engage in ongoing collaboration.	Process Communication	TBD	TBD	TBD	Ongoing	Questions for the membership, FACSA.
Support creation of formalized renewal procedures, processes, and decision rules/criteria and share with statewide authorizers to build consistency in evaluation of special education practices.	Workgroup	TBD	TBD	TBD	Phase/Year 2	FACSA meeting, workgroups.
Conduct an analysis of the proportion of students with disabilities enrolled in charter schools disaggregated by those enrolled in independent charters and those enrolled in schools operated by a CMO/EMO to determine if there are patterns or trends that could indicate schools with exemplar programs (e.g., higher than expected	Data Analysis	Data	FLSpEC	FLSpEC	3-6 months	Data pull is complete for this.

enrollment of students with disabilities) or schools with potential for concern (e.g., lower than expected enrollment of students with disabilities).						
---	--	--	--	--	--	--