

PARENTS' CAMPAIGN

Better Schools  Brighter Future

November 11, 2013

Mississippi Charter School Authorizer Board
Institutions of Higher Learning
3825 Ridgewood Road
Jackson, MS 39211
Attn.: Kim Gallaspy

Dear Ms. Gallaspy,

Please accept the following public comments, submitted on behalf of The Parents' Campaign, regarding the Charter School Application Guide/Request for Proposals (RFP) and Scoring Rubric. We appreciate the difficult, serious work of the Mississippi Charter School Authorizer Board in its development of the policies and procedures that will govern our state's charter schools for years to come.

It is the hope of The Parents' Campaign that charter schools will provide a strong public education for children who, heretofore, have been trapped in chronically underperforming schools. We at The Parents' Campaign believe that a detailed RFP and scoring rubric will facilitate that goal.

Alignment of the RFP and Rubric

Because the scoring rubric is the tool that will serve both as the final gate-keeper for meeting RFP requirements and as documentation of the reasons and rationale by which Mississippi's charter schools are approved, we believe it should address specifically what is required in each category in order to "meet the standard."

The rubric should facilitate equitable scoring among applicants and close scrutiny of critical details throughout each application review. If the rubric does not require reviewers to check specifications against what is required in the RFP, then the high standards outlined in the RFP will not necessarily be required for approval of a charter contract.

To better align the rubric with the RFP, the Board should consider adding throughout the rubric the critical details and clearly defined requirements that will aid reviewers in holding each application to the high standards of the RFP.

One example of the lack of alignment between the RFP and the rubric is transportation services. The Board is charged with authorizing schools that will expand opportunities for underserved students and transportation is essential to that responsibility. We applaud the Board's commitment to this principle, as demonstrated in the RFP:

"7. Operations – Transportation: Detail how reliable and safe transportation will be provided for all students."

However, the rubric clearly conflicts with this standard, giving applicants the option of not providing transportation services:

"Evaluation Criteria: If the applicants have elected to provide transportation, a response that meets the standards will:

- Present a thorough and cost effective transportation plan
- Provide specific evidence of readiness consistent with the school's budget assumptions

If the applicants have elected not to provide transportation, a response that meets the standard will:

- Present a clear statement of the school's intent not to provide transportation services
- Describe viable transportation options for students
- Describe a contingency plan for transporting students with disabilities"

"Applicant Instructions: State whether the school intends to provide transportation for students. If so, describe the transportation plan and explain budget revenue and expenditure assumptions including those related to students with disabilities."

We urge the Board to remove the optional transportation provisions in the rubric and revise Scoring Rubric Section V to reflect the RFP, requiring a detailed plan for providing safe and reliable transportation for all students.

Fidelity to Statute

Recognizing that the RFP is the public expression of the Board's intentions regarding the quality and operations of Mississippi's charter schools, we appreciate the complexities and overall tone of the document, which unquestionably sets forth high expectations that applicants must meet. We are concerned, however, about a few inconsistencies between the RFP and the statute (Mississippi Charter Schools Act of 2013) that lays out our state's requirements for charter schools.

For-profit Prohibition

Eliminating the profit motive from charter schools in Mississippi was a key point in The Parents' Campaign's support for the charter school bill. Our strong opposition to for-profit ownership or management of charter schools was, and is, based on the dismal performance record of for-profits operating charter schools in other states.

According to statute:

"A charter school and any education service provider which provides comprehensive management for a charter school must be a nonprofit education organization."
(House Bill 369, lines 1050-1052: Mississippi Charter Schools Act of 2013)

The RFP, however, omits a key portion of the statute:

"Note: Mississippi law prohibits charter schools from operating as for-profit corporations."

The problem is this: in other states many charter schools are themselves organized as non-profit entities, but are wholly managed by for-profit companies.

The RFP should clearly state what Mississippi law requires, in the Executive Summary Section VI (1.): a charter school and any education service provider which provides comprehensive management for a charter school must be a non-profit education organization. Similarly, the Scoring Rubric needs to state expressly this prohibition against for-profit charters or ESPs.

Lottery

The charter law states that an applicant must provide:

"Plans and timelines for student recruitment and enrollment, including lottery policies and procedures that ensure that every student has an equal opportunity to be considered in the lottery and that the lottery is equitable, randomized, transparent and impartial so that students are accepted in a charter school without regard to disability, income level, race, religion or national origin;"

(House Bill 369, lines 569-574: Mississippi Public Charter School Act of 2013)

The RFP states that an applicant must:

“Outline the planned admission process, including specifics around any admission priorities for students, lottery procedures and policies around waiting lists.”

The Board should revise RFP Section I (F.)(4.) to request a very detailed plan for admission and lottery procedures that reflects the Legislature’s intent to ensure equal opportunities for all children. The RFP could make this absolutely clear by simply using the exact wording from the charter school law, which will give applicants a concise, unambiguous understanding of the lottery policies and procedures that will meet the standard of Mississippi’s statute.

Track Record

The clear intent of the Legislature is for charter schools to provide a good public education in places where children are trapped in low-performing schools. This kind of turnaround work is exceedingly difficult. In fact, there are relatively few people equipped with the skills and dedication required for true school turnaround success, a factor that is largely responsible for the relatively high rate of charter school failure nationwide. It is imperative that the Board hold charter schools to the high standard required for success and require that those who are granted charters have demonstrated significant improvement in student achievement in a school turnaround environment.

According to statute, the RFP must require:

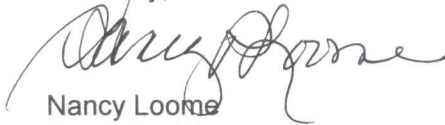
“Background information, including proof of United States citizenship, on the applicants, the proposed founding governing board members and, if identified, members of the proposed school leadership and management team. The background information must include annual student achievement data, disaggregated by subgroup, for every school year under the current or prior management of each board member and leadership team member;”

(House Bill 369, lines 533-539: Mississippi Public Charter School Act of 2013)

These requirements, including annual achievement data disaggregated by subgroup should be made explicit in the sections of the RFP dealing with the background information of leadership team members, RFP Section II (A.)(4.), and board members, RFP Section V (B.)(3.).

The work that the board will do over the next few weeks will have a dramatic impact on the lives of Mississippi children. We thank them for the seriousness with which they are attending to this process and for allowing us to share these comments with them.

Sincerely,



Nancy Loomis
Executive Director