September 2019

Profiles of Selected Practices of Charter Schools, Charter Management Organizations, and Charter School Authorizers

Part A, Justification

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Exhibits

1. Circumstances that make the collection of information necessary

Charter schools are independently managed, publicly funded schools which operate under a contract (a "charter") between the school and district, state, or other authorizing entity. The central premise of charter schools is that a balance of *autonomy* (provided by allowing schools to operate independent of existing local school districts) and *accountability* (enforced through both performance expectations of the agency authorizing the school's charter as well as pressure from parental satisfaction with the school and the decision to have their child stay or leave) would yield a sector of innovative and effective schools for families as well as governance structures that would provide new models for oversight and administration of schools. Since the first charter school opened in St. Paul, Minnesota, in 1992, charter schools have proliferated. By 2017–18, approximately 7,000 charter schools served 3.2 million students.[1]

In support of the federal Charter Schools Program's (CSP) dissemination goal, outlined in the *Elementary and Secondary Education Act of 1965*, as amended by the *Every Student Succeeds Act (ESSA)* Title IV, Part C, Section 4305(a)(3)(B), the U.S. Department of Education (Department) has commissioned a project, Profiles of Selected Practices of Charter Schools, Charter Management Organizations, and Charter School Authorizers (Contract # ED-PEP-16-A-0005), to create profiles of selected innovative practices of charter schools, charter management organizations (CMOs) or networks, and authorizers. Each profile will examine one innovative practice and feature three charter schools, networks, and/or charter authorizers that are implementing that practice with some indication of favorable student outcomes. The intention of each profile is to highlight key features of the practice, implementation challenges and successes, and lessons learned to inform the work of both charter and traditional public schools.

Purpose of the study

The charter sector has substantial flexibility to experiment and generate innovative practices that can inform the broader charter and traditional public school communities. Schools face many challenges in creating equal opportunity to an excellent education for all students, including meeting the needs of students with disabilities and English learners, supporting and developing novice teachers, building the capacity of school leaders, improving chronic underperformance, and serving families living in rural communities. This project will support the development and dissemination of profiles of innovative practices to create learning resources that highlight how some in the charter sector have tackled tough education issues, such as improving whole schools, supporting high-needs students, and building teacher and leader capacity.

Charter schools maintain practices in four main functional areas: school operations, community engagement, human capital, and instruction and student supports. For charter schools that are part of a network, the CMO or network central office provides support to schools in their network in each of these functional areas, as well as strategic thinking around topics such as scaling and expansion, developing human capital management systems, managing labor-management relations, knowledge management, and contracting with external providers for services such as teacher professional development trainings, leader development, or special education services for all schools in their network. Charter authorizers, in turn, influence schools and CMOs/networks through their approval and

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[1]   National Association of Charter School Authorizer (NACSA) (2018). *Leadership, commitment, judgment: Elements of successful charter school authorizing*. *Findings from the Quality Practice Project.* Chicago, IL: Author.

renewal standards and practices. This project's premise is that broad dissemination of innovations—by any of these actors in any of these areas—will lead to learning about promising innovative practices and change from the status quo followed by adaptation of those practices. Ultimately, expanded adoption of innovative practices can give more students and families public school options that have taken their unique needs into account.

The project's guiding questions are organized around five key categories and inform interview protocol development, data collection, analysis, and the drafting of each profile (Exhibit 1). The project team will work to ensure that each profile addresses the guiding questions, if applicable to that practice.

Exhibit 1. Project's Guiding Questions

Category	Project's Guiding Question
Key Features	• What are the key features of the innovative practice?
Implementation of Innovative Practices	• Why did the charter school, network, authorizer, or school district implement the innovative practice? What problem were they hoping to solve? • What evidence informed the charter school, network, authorizer, or district decision to implement this practice? • How is the practice operationalized? • What resources did the entity enlist to design and implement the practice? • Were there short-term startup costs? What was the timeline for design and implementation? How has the practice changed over time?
Challenges and Solutions	• What challenges did the charter school, network, authorizer, or district face in implementing the innovative practice? How did the organization overcome these challenges? • Were there any unintended consequences?
Signs of Successful Implementation	• What evidence suggests the implementation of the innovative practice has had the desired effect?
Lessons Learned	• What contextual factors (e.g., local community; authorization practices; state charter law; federal, state or local policies, such as ESSA; student population; leadership; network structure) facilitated implementation? • What advice would charter school, network, authorizer, or district practitioners give to others seeking to implement the innovative practice?

There are four main components to this project: the identification of profile topics; the selection of sites that exemplify those practices; the development of profiles of innovative practices; and dissemination of the profiles. To identify profile topics, the project team triangulated the guidance from 1) an expert panel comprised of 10 individuals representing charter school authorizers, charter management organizations (CMOs)/networks, charter schools, the charter school research community, and traditional public school districts; 2) a literature review of existing research, articles, and reports; and 3) a media scan of relevant news reports on innovative charter school, CMO/network, and authorizer practices. Findings from the literature review and media scan coupled with expert panel recommendations and input from the Department yielded a preliminary list of proposed practices to profile.

To select charter schools, networks, and authorizers implementing these practices for inclusion in the profiles, the project team used a multi-step process, including: the solicitation of nominations from expert panelists and other leaders in the field; the incorporation of findings from the project's literature review and media scan; examination of student performance through a "beating the odds" analysis; and the prioritization of federal Charter Schools Program (CSP) grantees or subgrantees.

Ultimately, six organizations per profile topic will be selected (three first choices and three second choices). For each of the profile topics, the project team will gather information from the three selected sites through site visits, which will include interviews, reviews of relevant documents, and informal observations (if applicable). The site visit data will be analyzed to address the project's guiding questions.

We will identify an initial contact for each site through website searches and/or our own professional contacts and begin the process of gaining access for information collection. A member of the project team will make initial phone contact with a leader from each selected organization to inquire about their interest and willingness to participate. The project team will invest sufficient time in the recruitment and communication phase to build relationships with site leaders, to clearly describe project purposes and requirements, and to gain support and access. To promote consistency, thoroughness, and responsiveness in site recruitment, project leaders will train all team members involved in recruiting and communicating with potential sites before initial contact. Finally, once sites agree to participate, the project team liaison will request information on any official processes for gaining access to the site for interviews (e.g., a research application) as well as any relevant documents about the innovative practice. The Department will send notification letters to each site once they have agreed to participate.

- The notification letters can be found in Appendix A.
- Interview protocols can be found in Appendix B.

Authorizing legislation

Work under this project will be conducted consistent with the *Elementary and Secondary Education Act of 1965*, as amended by the *Every Student Succeeds Act (ESSA)* Title IV, Part C, Section 4305(a)(3)(B) [Public Law 114-95 enacted in 2015], which authorizes the Department to use CSP funds to disseminate best practices regarding charter schools.

2. Indicate how, by whom, and for what purpose the information is to be used

The project will result in up to 13 profiles of innovative practices being used by charter schools, CMOs/networks, and charter school authorizers around the U.S. The profiles will be disseminated to educators, policymakers, parents, and other stakeholders to help them learn from and potentially replicate innovative practices that will give more students and families more public school options that take their unique needs and preferences into account. The resulting profiles will be qualitative in nature and will not employ statistical methods to make generalizable findings.

These profiles will be visually appealing, including graphics and visual cues where appropriate, while also providing sufficient information to be useful for its intended audience. The project team will work closely with the Department to develop the profile template, look, and optimal length.

Interview data will be the primary source for answering the guiding questions (Exhibit 1) for each profile topic but may be supplemented with information from document reviews and/or observations when appropriate (e.g., if profiling specific instructional practices). Each profile will include a thorough description of each practice's key features, process for implementation, challenges the practice addresses, evidence of successful implementation, and lessons learned.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology

The project team will use technology to maximize information collection efficiency and minimize respondent burden. To inform site visit interviews and minimize the number of questions asked of interview respondents, the project team will gather and review publicly available documents from site websites and general internet searches. To collect information about selected sites, including each the organization's name, address, primary point of contact, email address, and phone number, the project team will conduct website searches before contacting sites for this information. Finally, site visits will include in-person visits as well as virtual interviews using Zoom or another video-conference platform. All site visits and interviews will be scheduled by email.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above

The project team completed a review of academic literature, public reports, and the media to identify existing information to answer the project questions. The project team concluded this effort to identify and profile innovative practices occurring in charter schools, CMOs/networks, and charter school authorizers, for which clearance is requested, is the only project currently documenting and disseminating innovative practices in the charter sector to a broad field of education practitioners and policymakers. In the course of the review, the project team identified some existing information about specific charter sector practices that contributed to the design of the information collection instruments and will contribute to project findings, but found that information is not available to answer most of the guiding questions on a diverse set of topics. All information collected for this project aligns directly with the guiding questions, and all interview protocols focus on critical information not available from other sources.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden

Selected sites include charter schools, CMOs/networks, and charter school authorizers, some of which are small entities. To minimize burden on these small organizations, the project team will conduct a limited number of interviews (i.e., not more than 8) at each site. The protocols are free of jargon and inappropriate assumptions about respondents' background knowledge and experience.

The interview protocol has an item bank of questions that will allow us to adapt the protocol by choosing questions appropriate to each respondent type. They will be tailored to individual roles, as well as based on terminology and background knowledge gleaned from review of site-specific documents. Respondents who are likely to be knowledgeable about all aspects of the practice will be asked all questions. Other respondents will be asked a subset of the questions. This approach will ensure we use each respondent's time efficiently by only asking questions relevant to individual roles.

The project team was careful to develop protocols of a reasonable length (i.e., that can be completed in no more than 60 minutes). After piloting the interview protocol, the team found that 90 minutes would be necessary for asking all interview questions to the one or two respondents at each site who are knowledgable about all aspects of the practice. Thus, for these key respondents, we plan to request 90 minutes of their time.

6. Describe the consequence to federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden

The majority of research conducted to date on charter schools has assessed the impact of organizations by "type" (e.g., charter sector generally, charter network membership, for-profit or non-profit, or authorizer type) rather than examined specific practices or policies (e.g., the school's instructional approach, the authorizer's approach to charter application or renewal). As a result, the research provides few insights into charter *practices*. The profiles that this project will produce will fill this information gap by looking at innovative practices across the charter school sector and making this information available for stakeholders including educators, policymakers, administrators, and parents and families. Without this information, the Department and key stakeholders will lack essential information needed to identify, implement, and scale innovative practices in use in the charter sector.

7. Special circumstances

None of the special circumstances listed apply to this collection.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice

The 60-day federal register announcement was published on July 12, 2019 (vol. 84, no. 134, pg. 33244). We did not receive public comments. We consulted members of the project's expert panel to pilot the

interview questions. Based on the pilot, we made revisions to the collection instruments, which are reflected in this submission of the OMB package.

9. Payment or gift

The project team will provide no payment or gift to state, district, school, or project staff who participate in this project.

10. Assurances of confidentiality

The project team plans to identify sites by name in the profile, which is necessary in order to provide comprehensive descriptions of how each site approached and carried out the innovative practice in question. However, the project team will not name individuals and will keep all individual responses confidential except as required by law. Before each individual interview, the site visitors will explain the purpose of the project and the topics to be covered in the interview; respondents will be informed that the project team may include direct quotes in the profiles, but that no personally identifiable information will accompany these quotes.

The project team has extensive experience in protecting the privacy and confidentiality of interview respondents. Safeguards to protect the privacy and confidentiality of all respondents include the following:

- All team members will participate in data collection training that includes a focus on methods to maintain participant confidentiality and information security.
- The project team will provide secure environments for all information collected for the project.
- The project team will immediately de-identify all information collected during the project that can potentially be linked to an individual and will delete temporary files that are stored on encrypted hard drives during on-site information collection activities.
- Only authorized members of the project team will have direct access to de-identified project databases. Project team members will maintain a high level of focus on ensuring the confidentiality of information.
- After completion of the project, the project team will destroy all files with personally identifiable information.
- The team will not share information obtained in this research and will not use the information for purposes other than this project.

11. Justification for questions of a sensitive nature

The interview protocols will not include questions of a sensitive nature.

12. Estimates of the hour burden

It is estimated that the total annual hour burden for the information collection for the project is 265 hours. This totals to an annual estimated cost of **$12,555.**

The project team anticipates that interviews with the majority of respondents will take no more than 60

minutes to complete. The team plans to conduct 90-minute interviews with key respondents who are knowledgable about all aspects of the practice. Interviews will be conducted with only those individuals associated with the practice being profiled. Exhibit 2 presents the preliminary list of candidate practices, each of which will have a unique list of interviewees based on the practice.

The sample of respondents in each site depends on the profile topic for which it was selected and the relevance of the topic to the respondent's roles and responsibilities. For example, for a charter school practice such as community/family engagement, we would interview teachers, school leaders, and other school staff involved in community and family outreach. For a network practice such as human capital management, we would speak with network staff involved in the development and implementation of the policies and practices. In addition, we would seek to include school leaders and teachers at a sample of the network's schools to provide the perspective of individuals experiencing policies and practices driven by network leadership. For an authorizer practice, we would contact the authorizer's leadership team, any authorizer staff responsible for implementing the profiled practice, and, when relevant, a sample of network and/or school leaders who are subject to the authorizer's practice.

Exhibit 2. Profile Topics

Human Capital Management
1. How are charter schools and networks allocating human capital to address the dual challenges of efficiency and performance?
2. How are charter schools and networks addressing the need to quickly and effectively develop and induct new teachers?
3. How are charter networks addressing the challenge of developing and attracting high-capacity school leaders?
School Improvement
4. How are charter schools, charter networks, and school districts working together to improve chronically low-performing schools?
Serving Students with Disabilities
5. What charter authorizer practices and state policies have been developed to ensure proportionate enrollment of students with disabilities?
Community/Family Engagement
6. How are charter schools, charter networks, and school districts working together to provide family-friendly school enrollment systems to streamline applications and access to schools of choice?
7. How are charter schools, networks, and school districts working together to provide information tools and support systems to help families access choice?
Quality and Accountability
8. How are charter authorizers addressing the need for measurement systems that capture a broad spectrum of program goals?
9. How are charter schools and networks addressing the need to better understand students' postsecondary outcomes?
Student Supports

10. How are charter schools and networks addressing social emotional learning and mental health needs?
11. How are charter schools and networks using CTE programs to prepare students for postsecondary?

Exhibit 2. Profile Topics (concluded)

Sustaining and Replication of Effective Practices
12. How are independent charter schools sustaining and scaling effective practices?

We will develop an interview sample for each site based on the profile topic. Exhibit 3 provides an example interview sample for four possible topic areas.

Exhibit 3. Interview Sample for Four Possible Profile Topic Areas

Profile Topic	*#2: How are charter schools and networks addressing the need to quickly and effectively develop and induct new teachers?*	*#6: How are charter schools, charter networks, and school districts working together to address the need to provide family-friendly school enrollment systems?*	*#8: How are charter authorizers addressing the need for measurement systems that capture a broad spectrum of program goals?*	*#10: How are charter schools and networks addressing social emotional learning and mental health needs?*
Interview Sample	*Network* • CEO (or deputy) of a network • Chief academic officer • Director of operations • Director of human capital management *School* • Principal • Assistant principal • Instructional coach • Teachers	*Network* • CEO (or deputy) of a network • Director of operations • Community outreach coordinator *School district* • Superintendent (or deputy) • Director of community engagement • Director of access and enrollment *School* • Principal • Assistant principal of operations • Family and parent coordinator	*Charter authorizer* • CEO • Director of assessment, accountability and/or charter renewal review *Network* • CEO (or deputy) • Director of assessment and accountability *School* • School leaders	*Network* • Chief academic officer • Central department staff responsible for supporting the implementation social emotional learing and mental health programming *School* • Principal • Social workers • Teachers

In total, the project team plans to conduct 30 in-person or virtual site visits across the proposed profile topics. For each site visit, the project team expects to conduct up to eight interviews. Exhibit 4 provides

estimates of the number of interviews and the amount of time required to conduct them. In addition, we estimate up to two hours per site to assist in providing documents and scheduling the site visit interviews (Exhibit 5).

The overall cost burden for the estimated annual 265 hours for interviews and 60 hours for scheduling site visits needed for this information collection is $12,555. There are no monetary costs to respondents for this information collection activity.

Exhibit 4. Estimated number of annual respondents and labor hours for information collection

Respondent category	Number of respondents, by type[1]	Average time burden per respondent (in hours)	Total time burden (in hours)	Hourly wage rate (estimated $)	Total respondent cost (estimated $) – may not sum due to rounding
District[2]					
Superintendent (or Deputy)	7	1.5	10.5	$78	$818
Department Director	7	1.5	10.5	$57	$598
District Staff	4	1	4	$30	$119
Charter School Authorizer[3]					
Authorizer Leadership	8	1.5	12	$82	$981
Authorizer Staff	15	1	15	$48	$720
CMO or Charter Network[4]					
Chief Executive Officer	28	1.5	42	$73	$3,076
Chief Academic Officer	16	1	16	$35	$564
Chief Operations Officer	20	1	20	$35	$705
Department Directors	33	1	33	$29	$941
Charter School[5]					
School Leader	55	1	55	$47	$2,567
Non-Instructional School Staff (Program Coordinator, Counselor, Parent Coordinator)	31	1	31	$32	$978
Teacher	16	1	16	$30	$486
Total	**240**		**265**		**$12,555**

[1] We anticipate profiling 30 sites and conducting 8 interviews per site for a total of 240 interviews. To determine the number of respondents, by type, we created a preliminary list of respondents by each preliminary topic area. Topics that focus on school-level practices include only school-level respondents such as school leaders and teachers. Topics at the network or authorizer level include network and authorizer staff as well as school-level staff, if relevant to the topic.

[2] Wage estimates for district respondents are from Salary.com, https://www.salary.com/, retrieved May 13, 2019, and PayScale.com, https://www.payscale.com/research/US, retrieved May 13, 2019.

[3] Wage estimates for charter authorizer respondents are from the D.C. Public Charter School Board, https://www.dcpcsb.org/sites/default/files/2018-11-01%20DC%20PCSB%20Salary%20Info%20%20%281%29.pdf, retrieved May 13, 2019.

[4] Wage estimates for CMO/network respondents are from Nonprofit Quarterly, https://nonprofitquarterly.org/2017/01/17/charters-public-whats-exec-salaries/, retrieved May 15, 2019, and PayScale.com, https://www.payscale.com/research/US, retrieved May 13, 2019.

[5] Wage estimates for school respondents are from the Bureau of Labor Statistics (BLS), https://www.bls.gov/data/, retrieved on May 13, 2019.

Exhibit 5. Estimated number of site contacts and labor hours for scheduling site visits

Site contact	Number of site contacts, by type	Average time burden per site contact (in hours)	Total time burden (in hours)	Hourly wage rate (estimated $)	Total respondent cost (estimated $) – may not sum due to rounding
District Staff[1]	3	2	6	$30	$179
Authorizer Staff[2]	3	2	6	$48	$288
CMO/Network Department Director[3]	12	2	24	$29	$684
Charter School Non-Instructional Staff[4]	12	2	24	$32	$757
Total	**30**		**60**		**$1,909**

[1] Wage estimates for district respondents are from Salary.com, https://www.salary.com/, retrieved May 13, 2019, and PayScale.com, https://www.payscale.com/research/US, retrieved May 13, 2019.

[2] Wage estimates for charter authorizer respondents are from the D.C. Public Charter School Board, https://www.dcpcsb.org/sites/default/files/2018-11-01%20DC%20PCSB%20Salary%20Info%20%20%281%29.pdf, retrieved May 13, 2019.

[3] Wage estimates for CMO/network respondents are from Nonprofit Quarterly, https://nonprofitquarterly.org/2017/01/17/charters-public-whats-exec-salaries/, retrieved May 15, 2019, and PayScale.com, https://www.payscale.com/research/US, retrieved May 13, 2019.

[4] Wage estimates for school respondents are from the Bureau of Labor Statistics (BLS), https://www.bls.gov/data/, retrieved on May 13, 2019.

13. Total annual cost burden for this activity

There is no capital or start-up cost component to these information collection activities, nor is there any operations, maintenance, or purchase cost associated with the project.

14. Annualized costs to the federal government

The estimated annualized cost of the project to the federal government is $357,824. The estimate is based on the total contract cost of $685,830, amortized over a 23-month performance period. This total includes costs already invoiced, plus budgeted future costs charged to the government for contractual services from SRI Education, Center on Reinventing Public Education (CRPE), and Policy Studies Associates (PSA) to finalize the project design, site selection, information collection (including travel for site visits), analysis, and reporting.

15. Program changes in burden/cost estimates

This is a new information collection; this results in a program change increase in burden and responses of 265 hours and 240 responses.

16. Plans for tabulation and publication

The project will result in up to 13 profiles of innovative practices being used by charter schools, CMOs/networks, and charter school authorizers nationwide. These practices will address areas including: human capital management; school improvement; serving students with disabilities;

community/family engagement; quality and accountability; student supports, and sustaining and replication of effective practices. The final profiles will describe the problem each practice addresses, the selected sites exemplifying that practice, practice design and start up, practice implementation, challenges and solutions, signs of successful implementation, and lessons learned. The final profiles will be designed for dissemination to key stakeholders throughout the charter and traditional public school sector, including administrators, educators, and parents and families, through events, professional networks, publications for dissemination on social media and through online communities, and other targeted dissemination strategies.

Informaiton collection is tentatively scheduled to begin in November 2019 (pending OMB approval) and end in March 2020. We plan to analyze the information on a rolling basis as site visits are completed for each profile topic. The analysis will begin in December 2019, and the final profiles are scheduled for completion in April 2020.

17. Expiration date omission approval

All data collection instruments will include the OMB control number and collection expiration date.

18. Exceptions to the certification statement

There are no exceptions requested.