

February 13, 2017

The Honorable Betsy DeVos
Secretary of Education
Washington, D.C.

The Honorable Lamar Alexander
Chair
U.S. Senate Health, Education, Labor &
Pensions Committee
Washington, D.C.

The Honorable Patty Murray
Ranking Member
U.S. Senate Health, Education, Labor &
Pensions Committee
Washington, D.C.

The Honorable Virginia Foxx
Chair
U.S. House Education and Workforce
Committee
Washington, D.C.

The Honorable Bobby Scott
Ranking Member
U.S. House Education and Workforce
Committee
Washington, D.C.

Dear Secretary DeVos, Senators Alexander and Murray, and Representatives Foxx and Scott:

I am writing on behalf of the National Association of Charter School Authorizers (NACSA) to share our vision for advancing charter school opportunities in the interests of students, parents and taxpayers. NACSA has a long, bipartisan history of working to improve charter school authorizing and, subsequently, charter schools.

Charter schools are one of the most popular, successful, and sustained education improvement strategy of the past 25 years. Thousands of schools have opened, millions of children have received an education that better prepares them for success in life.

During that time, NACSA learned lessons that have enabled the charter school sector to continuously improve. For example, while demand for great schools is high everywhere, supply is not. Great schools are not a commodity with an automatic, endless, or instantaneous supply. To grow great schools, we need to simultaneously support three principles: access, autonomy, and accountability.

- Access means more students have the opportunity to attend and benefit from a quality charter school.
- Autonomy means schools have the flexibility to innovate and adapt to meet the needs of their students.
- Accountability means schools face tangible consequences based on their outcomes for students, families, and taxpayers.

We have learned that when states expand charter schooling too quickly, they experience mixed results. Too often, an emphasis on greater access and autonomy is done at the expense of accountability and school quality suffers. In contrast, states that *also* pursue accountability, by

setting rigorous standards of quality and transparency for schools and authorizers, have achieved smart growth and quality together.

Years of federal investment in charter school growth have been successful because of the interplay between access, autonomy, and accountability. Simply put, this interplay is essential to maintain and expand a successful federal investment and give more students the opportunity to attend great charter schools. Successful interplay of these three principles creates an education marketplace that is accountable to the taxpayers and provides parents with choice they can trust.

The following recommended priorities can create more great charter schools by supporting the principles of access, autonomy, and accountability in federal policy initiatives.

FEDERAL ACTIONS TO SUPPORT GREAT CHARTER SCHOOLS

Invest in What Works: The Charter School Program

The Charter School Program has a 20-year history of supporting great charter schools through several grant programs. NACSA recommends increasing appropriations for the Charter School Program to \$1 billion by 2020.

The grant programs authorized under the Every Student Succeeds Act invest in five areas of proven need: start-up costs for new and expanding charter schools; strengthening state systems of access, autonomy, and accountability; facilities and financing access; replicating proven models; and continuing research into (and dissemination of) best practice in the charter school sector.

We join with other members of the charter school community and respectfully request that significant new funds for the Charter School Program not come at the expense of existing funding for Title I, IDEA, or other critical programs that are vital for all public schools.

ESSA made substantial, positive, bipartisan changes to the Charter School Program that will ensure this federal investment continues to grow great charter schools. We strongly encourage the Administration to implement the program as authorized by ESSA, specifically:

- Distribute funds to the State, Replication and Expansion (CMO), and National Activities programs as written in statute: 65% State, 18% CMO, 2.5% National Activities. *In the future, this distribution may need to be reexamined for a handful of programs—such as the individual charter school grantee program—should the program grow to more than double the current authorization levels.*
- Robustly evaluate applications according to the new assurances, application requirements, and programs priorities. This ensures grant funds go to states that are committed to supporting access, autonomy, and accountability within their charter sector.
- In its 2013 study on charter school outcomes, the Center for Research on Education Outcomes (CREDO) at Stanford University concluded that authorizers have an impact on charter school quality and that authorizing practices and actions contributed overall to improved student outcomes in multiple states. ESSA contains two vehicles to invest in authorizing at the national and local levels and we encourage the use of both:

- Use the National Activities authorization to invest in and support quality authorizing in states and across the country. This is a continuing focus under ESSA. A similar focus in the previous authorization of this program supported countless projects from the National Charter School Resources and invested in state and national models that are continually being adapted for local use.
- Maintain the statutory requirement that states receiving a State Charter School Program grant use at least 7% of its grant to develop and implement programs to foster statewide improvement and technical assistance to its charter sector. This can include state-driven efforts to support quality authorizing.
- Consider waiver requests for Charter School Program grants made in FY15 and FY16. Previously, the Department of Education did not consider waiver requests for current grantees, even though Congress gave the Department of Education this ability in order to assist in a smooth ESSA transition. Waivers can help states use new ESSA-authorized program flexibility immediately, such as by: providing charter schools with greater flexibility in their use of grant funds; increasing the state investment in the replication and/or expansion of successful charter schools; or increasing state investment in statewide, state-directed efforts to improve school and authorizer quality.

Leverage the Federal Investment in Charter Schools to Learn What Works and Disseminate the Best State Innovations

The charter sector will continue to innovate as it grows. As that happens, new issues often emerge. To keep up with this pace of change, the Department of Education needs to use its unique national position and engage in three activities:

- Elevate proven practices: NACSA urges the Administration to continue its role as an active clearinghouse of the best practices in the charter sector. This includes cataloging and promoting proven innovations from charter schools, authorizers, and others in the charter sector that may be more widely applicable in the traditional public school sector.
- Engage in data collection: NACSA recommends the Administration continue annual data collection on various aspects of the charter school sector. The creation of a national, uniform database on charter school data is an important mechanism for taxpayer transparency and accountability at the state and national level. It is also an invaluable tool for researchers, such as NACSA, that work to catalog, analyze, and promote the best local practices.
- Be a beacon of leadership on emerging issues: NACSA recommends the administration continue the Department's long, bipartisan history of working to address issues in the charter sector as they emerge. Right now this includes new questions about the use of federal funds within Charter Management Organizations, and next year it may include other important issues. NACSA believes it is important to address these emerging issues in a thoughtful and timely manner to ensure the charter sector maintains the trust of parents and taxpayers. Specifically, NACSA would be pleased to serve as an external stakeholder as the Department develops its response to the recent Office of Inspector General report on oversight of Charter Management Organizations.

We encourage the Administration to leverage NACSA as a partner as it pursues this work.

Engage with Charter School Authorizers as You Explore New Programs and Investments

Though we might not grab headlines, charter school authorizers have been on the front lines of the push for outcome-based education reform since the first charter schools were opened more than 25 years ago. This gives us significant experience in taking the necessary—sometimes difficult—actions to realize the crucial balance between choice and accountability that grows great charter schools.

This experience is increasingly being leveraged outside the authorizing space by partners that have an interest in diverse school success. Authorizers have worked on projects like adapting charter performance frameworks for state or district-wide use, collaborating with lenders to improve lender assessments of risk and financial stability in a choice marketplace, and transforming isolated authorizer practices into statewide policy initiatives that encourage great schools to replicate and grow.

- High quality authorizing is a transferable skill set in our outcome-based education environment. NACSA encourages you to engage with charter school authorizers as you explore new programs and investments in the charter sector and beyond.

At NACSA, we believe that every child deserves the opportunity to attend an excellent school, and that high-quality charter schools can help achieve that ideal. We work to improve public education by strengthening the policies and practices of authorizers—the organizations responsible for approving and overseeing charter schools.

We look forward to working with the Administration and Congress to advance our shared goals. Please feel free to contact Amanda Fenton, Director of State and Federal Policy, at 510.612.3244 or amandaf@qualitycharters.org with any questions.

Regards,

John E. Hedstrom
Vice President, Policy & Advocacy
National Association of Charter School Authorizers