APPENDIX C: PARTNERING WITH CHARTER SCHOOLS

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INTRODUCTION

The purpose of this appendix is to provide additional information for charter schools on the necessary steps to apply for funding for the programs outlined in the Integrated Guidance. This includes, defining and distilling the various relationships between charter schools and districts and recommendations on how to best move through the integrated application process for the 2025-27 biennium. While this appendix will cover funding for the following seven programs as mirrored in the Integrated Guidance, it is important to note that the majority of charter schools will not be eligible for all funding streams. The funding streams included in this guidance are:

- High School Success (HSS);
- Student Investment Account (SIA);
- Early Indicator Intervention System (EIIS);
- Early Literacy Success School District Grants (ELSSDG);
- Career and Technical Education - Perkins V (CTE);
- Federal School Improvement (CSI / TSI schools); and or
- Every Day Matters (EDM).

For a full description of these programs please refer to Section 1 of the Integrated Guidance. We expect charter schools to read through the Integrated Guidance and use this document as supplemental guidance for pieces that are specific to charter school situations. All charter schools participating in these funding streams will be required to go through a full integrated application process to create a four-year plan. However, we hope that this appendix will help determine what types of funding each charter school should be pursuing and in what formation they should be applying for that funding (independently or with their district). There will be one application and plan for all of the funding streams listed above, but there may be variation in fiscal management and/or programmatic reporting.

GETTING STARTED

To get started, it is recommended that charter schools follow the below steps as a precursor to engaging with the fullness of the Integrated Guidance:

1. Read through the Integrated Guidance in its entirety and use this appendix to help address questions specific to charter schools.
2. Determine the streams of funding the charter school is eligible to receive.
3. Determine the appropriate scenario in Table A to determine how to apply for funds.
4. If serving students in grades 9-12, contact the CTE Regional Coordinator to find out more information about how to participate with your regional consortia.
5. Once the funding streams and manner of application have been determined, proceed with 12-Steps of the Planning and Application Process outlined in Section 1 of the Integrated Guidance.

SECTION ONE: UNDERSTANDING PROGRAM ELIGIBILITY

The purpose of this section is to provide further detail regarding eligibility for charter schools as it relates to the seven programs addressed in the Integrated Guidance. As stated in the introduction, while the Integrated Guidance addresses seven programs, the majority of charter schools will only be eligible for 1-4 of these programs (namely HSS, SIA, EIIS, and ELSSDG):

As outlined below, the eligibility parameters for charter schools to participate in the majority of these programs are simple and straightforward; however, more detail has been provided for SIA eligibility as indicated in statute.

HSS FUNDING

- Both non-virtual charter schools and virtual charter schools who serve students in grades 9-12 are eligible to receive HSS funding. Charter schools may be their own fiscal agent for HSS funding or ask their sponsoring district to be their fiscal agent. This should be articulated in the Intent to Apply process.

SIA FUNDING

- Non-virtual public charter schools are eligible to access the SIA funding. There are two ways that charter schools may receive SIA funding:
- Charters Eligible to Apply Independently[151]: Charter schools that are eligible to apply independently must meet the following criteria:
  - These public charter schools must have a student population of which at least 35% of the student population is composed from one the following student groups:
    - Economically disadvantaged students who are eligible for free or reduced price lunches under the United States Department of Agriculture's current Income Eligibility Guidelines;
    - Racial or ethnic groups that have historically experienced academic disparities including American Indian/Alaska Native, Black/African American students, Hispanic/Latino, Native Hawaiian/Pacific Islander, and multiracial; or
    - Students with disabilities who have an Individualized Education Program (IEP).
  - In addition to the public charter school having at least 35% of their student populations made up of one of the above student groups, for that particular student group, the charter school's percentage must be greater than or equal to the district's percentage in the same category.
- Charter Schools Participating with a Sponsoring District: All non-virtual public charter schools who are not eligible to apply independently may be invited to participate in their district's application based on the eligibility requirements outlined in HB 3427. Due to a legislative change in HB 2060, State Sponsored Charter schools who are not eligible to apply independently are to be considered as charter schools participating with their sponsoring district and may be invited to participate in their local district's application. As a reminder, if a district invites one non-virtual public charter school, they must invite all non-virtual public charter schools in their district to apply.

EIIS FUNDING

- Both non-virtual charter schools and virtual charter schools are eligible to receive EIIS funding. Charter schools may be their own fiscal agent for EIIS funding or ask their sponsoring district to be their fiscal agent. This should be articulated in the Intent to Apply process.

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151   The ODE releases a list of Charter Schools Eligible to Apply Independently for SIA Funds prior to the planning and application window each biennium and will do so in the Fall of 2024 for this application window.

ELSSDG FUNDING

- Non-virtual charter schools that serve students in grades PreK-3 are eligible to receive ELSSDG funding. Charter schools may be their own fiscal agent for ELSSDG funding or ask their sponsoring district to be their fiscal agent. This should be articulated in the Intent to Apply process.

PERKINS V FUNDING

- According to Perkins Law, charter schools are not eligible to receive Perkins funding for Career Technical Education directly from ODE. Both virtual and non-virtual charter schools serving students in grades 9-12 are participants in those funds through their sponsoring district. Charter school administrators are encouraged to contact the CTE Regional Coordinator in their area to determine if their sponsoring district is a direct grant recipient or a consortia member for CTE and to find out more information about how to participate. A charter school must have a CTE Program of Study to be eligible to participate in Perkins federal funds.

FEDERAL SCHOOL IMPROVEMENT FUNDING

- Charter schools and districts do not apply for funding that is associated with being identified as a CSI/TSI school. If a charter school is identified as needing Comprehensive Support & Improvement (CSI) or Targeted Support & Improvement (TSI), then they could receive Federal School Improvement funding through an agreement with the sponsoring district. The district will provide the funding for either district level improvements that benefit all students or give funding directly to the charter school if identified as needing CSI or TSI support. If a charter school is identified as CSI/TSI, they will be required to develop a school-level plan and budget to address the areas in need of support, to be submitted each year of identification and in alignment with their integrated application.

EVERY DAY MATTERS FUNDING

- Charter schools and districts do not apply for funding that is associated with Every Day Matters (EDM); however, funding is provided to all 19 Education Service Districts (ESDs) for technical assistance, coaching, and additional support for school districts and charter schools. This funding focuses on student attendance, belonging, and engagement. Information on the ESD Partnership is further described in Section 8 of this guidance.

VIRTUAL CHARTER SCHOOLS

ODE will publish a list of virtual charter schools prior to the beginning of each new biennium.

Virtual charter schools are not eligible to apply for SIA or ELSSDG grants; however, they can participate in EIIS funding, as well as Perkins and HSS funding (if they serve students in grades 9-12). Regardless of how a virtual charter schools applies for the funding under the integrated guidance, they are not required to participate in the following:

- Longitudinal Performance Growth Target (LPGT) Performance Measures[152].
- Community Engagement.

SIA DISTRICT AND CHARTER SCHOOL RELATIONSHIPS

ODE will publish a list of charter schools eligible to apply independently prior to the beginning of each new biennium.

Districts and charter schools are only allowed to make shifts to their relationship during an application cycle that will occur at the beginning of a biennium. Changes in relationships cannot occur mid-biennium. This means that if you applied with your district at the beginning of the 2023 biennium, but then became eligible to apply independently in 2024 you would still need to remain in relationship with your district until the 2025-27 application cycle when you could pursue an independent application.

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152   Virtual charter school data are not included in the district's SIA or ELSSDG allocation, nor are they included in the LPGT Performance Measures.

A Note for Districts on Charter School participation in SIA:

- Districts determine whether they will invite their charter schools to participate in the district SIA plan. Districts are strongly encouraged to invite all non-virtual charter schools within the district boundary.
- If a district invites one charter school to participate, it must invite all non-virtual charter schools located within the district to participate.
- It's important to remember when a charter school is not included in a district application, the district's total SIA allocation will be reduced by the nonparticipating charter schools' ADMw SIA funding calculation.
- If a charter school closes during the biennium, then the district grant agreement allocation will be adjusted for the following grant cycle with the updated ADMw from each year.
- If a charter school is NOT invited to participate in SIA, this does not affect its ability to apply for any of the other funding streams outlined in the Integrated Guidance.

SECTION TWO: HOW TO APPLY

It is our intent with the integrated plan and application to streamline work for districts and charter schools. For the 2023-25 biennium, your application and relationship with your district was defined by your SIA eligibility as it was the most detailed in statute (see Section 1 of this guidance) and we will continue with this structure for the 2025-27 biennium. However, we also understand that charter schools may want to maintain fiscal autonomy where allowable; therefore, we are providing the following scenarios to best fit your financial management and program planning needs. For all of the below scenarios you would submit one plan and application for all of the funding streams that you are applying for which would allow for one joint community engagement and one joint needs assessment as outlined in the Integrated Guidance. Table A shows how SIA eligibility will help determine your District and Charter relationship for the application; the application type you would pursue and whether a District Charter Program Agreement (DCPA) is needed. The options below show differences in designating fiscal agent responsibilities and reporting structure. Table B shows who the fiscal agent would be for your SIA funding (as laid out in statute) versus the fiscal agent for other funding streams and how reporting will be managed.

Table A: Application Formation Options

Application Formation	Application Type	DCPA
Scenario 1: Independent Charter (This would include Virtual Charter schools not eligible for SIA and ELSSDG)	Full IG Application (with some modifications due to SIA funds not being available to virtual charters): All narrative responses, assurances, and IPBT link.	N/A
Scenario 2: District Sponsored Charter [153] (Partially Administered)	Included in district application: charter school will fill out its own IPBT link and share with district to be included in application package, work collaboratively with district to provide appropriate narrative responses to show charter school process in Needs Assessment, Plan Summary and Community Engagement.	District Charter Program Agreement for any program under the IG where the District agrees to be the fiscal agent.
Scenario 3: District Sponsored Charter (Fully administered)	Included in district application: Charter school included as line items in district's IPBT link, work collaboratively with district to provide appropriate narrative responses to show charter school process in Needs Assessment, Plan Summary and Community Engagement.	District Charter Program Agreement for any program under the IG where the district agrees to be the fiscal agent.

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153   Includes State Sponsored charters which fall within the geographic boundaries of the district.

Table B: Post Application Grant Agreement[154] and Reporting Structures

Application Formation	Fiscal Agent for SIA	Fiscal Agent for All Other Programs	Reporting
Scenario 1: Independent Charter (This would include Virtual Charter schools not eligible for SIA and ELSSDG)	Charter	Charter	Charter submits directly to ODE.
Scenario 2: District Sponsored Charter [155] (Partially Administered)	District	District or charter	Charter submits via an independent reporting dashboard that is linked to the district RAD. District is accountable to ODE and must ensure the charter school completes the reporting requirements.
Scenario 3: District Sponsored Charter (Fully administered)	District	District or charter	Charter is embedded in the district reporting dashboard and therefore submits with the district reporting.

SCENARIO 1: If you are eligible to apply for SIA funding independently, or are a virtual charter applying for HSS and/or EIIS, then you will be your own fiscal agent for all funding initiatives that you are applying for. You will have a grant agreement directly with ODE, and you will submit your reporting directly to ODE. No DCPA is needed as you are applying independently.

SCENARIO 2: If you are not eligible to apply for SIA funding independently, then you may be invited to participate with your district's application. In this scenario it is required to have the district be your fiscal agent for SIA funds, however if you would like to maintain fiscal autonomy for the other funding streams you are applying for, then you have the option for the charter school to be the fiscal agent for any other funding streams outside of SIA (HSS, EIIS, and ELSSDG).

You will be required to submit a DCPA outlining this relationship with your district for *any funding stream where the district serves as the fiscal agent*.

You will submit one charter budget (IPBT) for all funding initiatives and reporting for all funding streams would occur as an integrated report on a separate charter school dashboard.

Please Note: A change for the 25-27 biennium, Charter schools who are applying with their district will be required to submit at least one artifact demonstrating community engagement. See Section 2 for specific application requirements.

This is considered a **Partially Administered** relationship.

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154   Each program will have a separate grant agreement that will need to be signed by the grantee.
155   Includes State Sponsored charters which fall within the geographic boundaries of the district.

SCENARIO 3: This option is similar to Scenario 2 in that your district must be your fiscal agent for SIA funds, but you have the option to be your own fiscal agent for EIIS, HSS, and ELSSDG.

You will be required to submit a DCPA outlining this relationship with your district for *any funding stream where the district serves as the fiscal agent.*

Your reporting would be embedded within the district's reporting dashboard and you would not be required to submit a separate charter budget (IPBT).

Please Note: A change for the 25-27 biennium, Charter schools who are applying with their district will be required to submit at least one artifact demonstrating community engagement. See Section 2 for specific application requirements.

This is considered a **Fully Administered** relationship.

CONSORTIA FOR CHARTERS

- Charter Schools eligible to apply independently can join an Aligned Program Consortia with other districts, other independent charter schools, and/or YCEPs/JDEPs within their geographic boundary. All other unique consortia formations are not allowed.

- Charter schools *are* allowed to be a part of a CTE Regional Consortia.

- Virtual charter schools could be in consortia with each other, when only receiving HSS and EIIS funding. Virtual charter schools may be eligible to join in an Aligned Program Consortia with schools and districts receiving other funds, but *may not benefit from SIA funding*.

For additional guidance on Consortia, please refer to Application Preview of the Integrated Guidance.

SECTION THREE: REPORTING REQUIREMENTS BASED ON YOUR APPROACH

PROGRAMMATIC AND FINANCIAL REPORTING AND AUDITING

This section reiterates some of the key reporting requirements offered in Section 5 & 6 of the Integrated Guidance. Charter schools will be held to the same reporting requirements as districts whether they have applied independently or are reporting with the district. However, the reporting structure may vary depending on the option you chose for applying for funding. Please see the adapted table below to show the reporting structures:

Table C: Reporting Structures

Application Formation	Reporting	District Charter Program Agreement (DCPA)
Scenario 1: Independent Charter (This would include Virtual Charter schools not eligible for SIA and ELSSDG)	Charter submits directly to ODE.	N/A
Scenario 2: District Sponsored Charter[156]	Charter submits via an independent reporting dashboard. District is accountable to ODE and must ensure the charter school completes the reporting requirements.	Required for all initiatives wherein the district serves as the fiscal agent.
Scenario 3: District Sponsored Charter (Fully administered)	Charter is embedded in the district reporting dashboard and therefore submits with the district reporting.	Required for all initiatives wherein the district serves as the fiscal agent.

GUIDE TO PROGRESS REPORTING

Each quarter, both districts and charter schools are required to submit programmatic and financial progress reports to ODE to monitor progress and complete spending prior to the end of the grant period.

The reporting dates for the 2025-27 biennium will be outlined in the grant agreement that grantees receive after submitting a complete plan and application in the Spring of 2025. ODE will also share reminders via Smartsheet and through EII messages as reporting deadlines are approaching. The details and format of this report will be released at a later date, but a general outline of reporting requirements is included in Section 6 of the Integrated Guidance.

GUIDE TO ANNUAL REPORTING

SIA recipients are required by statute to review their own progress on an annual basis through a cumulative progress report and municipal audit. This requirement is for both districts and charter schools and now extends to all funding initiatives as we continue to pursue an integrated process in 2025-27. Districts with participating charter schools are encouraged to include their charter school's reflections and progress within their submission of their Annual Progress Report.

Charter schools who applied independently for SIA funding will submit their own Annual Progress Report that will be included on their reporting dashboard before the fourth quarter report. The details and format of this report will be released at a later date, but a general outline of reporting requirements is included in Section 6 of the Integrated Guidance.

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156   Includes State Sponsored charters which fall within the geographic boundaries of the district.

SECTION FOUR: DISTRICT CHARTER PROGRAM AGREEMENT (DCPA)

A District Charter Program Agreement (DCPA) is required whenever a charter school is joining in with a district for funding or for any program where the district acts as the fiscal agent under this guidance (see Table B in Section 2 of this guidance). ODE does not require or provide a specific DCPA template; however, the following sections must be addressed:

- Charter School Plan and Budget for Eligible Funding;
- Exchange of Services;
- Distribution of Funds;
- Administrative Costs;
- Allowable Uses;
- Accountability; and
- Reporting Progress.

Updated DCPA should span the 2025-27 biennium and must be submitted as part of the integrated application due to ODE by April 30, 2025. We encourage districts and charter schools to have one agreement that would outline the fiscal and programmatic relationship between the district and charter school.

Grant agreements sent to the district will not be fully executed and funds will not be made available until there is a signed DCPA in place.

CHARTER SCHOOL PLAN AND BUDGET FOR ELIGIBLE FUNDING

The charter school plan and budget will span the 2025-27 biennium for each funding initiative. As outlined in the Integrated Guidance, each charter school will engage with their district in a needs assessment and community engagement to determine their planned outcomes, strategies, and activities.

When districts and charter schools apply together, it is important that charter school staff play an active role in all aspects of the planning, development, implementation and subsequent monitoring of the shared plan. The charter school may share some or all of the same outcomes, strategies and activities with the district in the plan, or alternatively, may have their own specific priorities that are listed in the plan. Either way, it's important that the district-community-charter relationship is maintained over the course of the year(s) so that a shared understanding of implementation successes and challenges is developed and that everyone works together to support the needs of every student.

One approach to ensuring a strong district-charter relationship from the beginning may be to develop a team that meets at regularly scheduled times, with representation from the participating charter school(s) as community engagement, planning, updating, monitoring and implementation unfold.

EXCHANGE OF SERVICES

The Agreement should clarify what services the district and the charter school will be responsible for providing. Please refer to Table A in Section 2 of this guidance to determine how you will proceed with fiscal responsibilities for each funding stream.

GRANT FULLY ADMINISTERED BY THE DISTRICT: If the grant is completely administered by the district, this means that the charter school will be fully embedded within the district plan and budget and reporting will occur on the same reporting dashboard. There will be no financial pass-through amount in the DCPA, and the district will spend all grant funding on behalf of the charter school and to the benefit of the charter school.

GRANT PARTIALLY ADMINISTERED BY THE DISTRICT: If a grant is partially administered by the district, then the district will provide broad fiscal and monitoring oversight; however, the charter school will act largely independently. The district will pass through the partial or full allocation to the charter to spend funds on their own.

The charter school will maintain its own plan and budget and will report progress separately on the charter school dashboard but reporting submission will flow through the district to ODE.

If the district and charter school agree for the district to retain any portion of the funds generated by the ADMw attributed to the charter school, the agreement should describe:

- the level of service the charter school can expect (such as use of the district's hiring services, providing disability support services, or professional development, etc.);
- description of how those funds retained by the district will be used; and
- how the charter school may benefit from or participate in activities paid for with those funds.

In some cases, it might be mutually agreed upon that the charter school will provide services to the district. A charter school may be well positioned to offer training or professional development to the district. Other services that should be included in the agreement are: fiscal oversight and management of the grant; data collection and preparation; and procurement and contracting.

DISTRIBUTION OF FUNDS

The agreement should clarify whether or not the charter school will receive funds from the district (partially administered) or whether the charter school will mutually benefit from planned spending of funding by the district (fully administered). In some instances a district and charter school may have a relationship where they function as one "district" and the charter school does not plan to spend the funds separately from the district.

If the charter school will receive funds, the agreement should specify the percentage or amount that the district will pass through to the charter school and what percentage, if any, the district will withhold. ODE encourages school districts to pass through 100 percent of the funds generated by the ADMw attributed to the charter school. Examples of when a district may choose to not pass through 100 percent of the funds include administrative costs, professional development, and/or other services or activities that would benefit both the district and the charter school. However, these funds and their purpose need to be appropriately outlined in the DCPA and agreed upon by both parties. Agreements should include a general timeline for the distribution of funds that aligns with ODE's calendar for distribution to the district. This might be similar to other timelines in the charter school contract (e.g. disbursement of funds to the charter school will occur within 10 days of when the district receives the funds from the ODE).

In some cases, a district may want to pass through more than the charter school allocation. If a district is interested in passing through additional funding to the charter school, the district must submit a request to their District Grant Manager at ODE with the rationale for passing through more funding. ODE will review the request and notify the district and charter school whether the request has been approved or not.

ADMINISTRATIVE COSTS

While not required, a grant recipient may use administrative costs for SIA, HSS, and ELSSDG funding. If a charter school plans to spend funding on administrative costs then they must adhere to the programmatic parameters from statute that are outlined below.

For SIA funds, administrative costs include indirect and direct costs related to allowed expenditures as provided in the grant agreement. Administrative costs are limited to 5% of the total expenditures or $500,000, whichever is less. Any administrative costs incurred by a participating charter school must be accounted for within the school district's overall limit of 5% or $500,000, whichever is less. The DCPA should state what percent of the charter allocation may be used on administrative costs. Administrative costs may be put towards costs associated with applying.

For HSS funds, administrative costs include indirect and direct costs and is limited to 4% of a grant recipient's allocation over the course of a biennium. If grant recipients (including charter schools) are taking administrative costs from HSS, per ORS 327.889, they will need to conduct an annual analysis of student attendance in grades 9 through 12 and disciplinary referrals, suspensions, and expulsions in grades 9 through 12 disaggregated by race and as part of their annual progress report. Unlike SIA funds, districts who are the fiscal agent for charter schools under HSS funding, are not allowed to withhold any funding for administrative costs or services and the entire charter school allocation must be passed through to the charter school.

For ELSSDG, administrative costs include indirect and direct costs related to allowed expenditures as provided in the grant agreement. Administrative costs are limited to 5% of the total expenditures. Administrative costs may be put towards costs associated with applying.

ALLOWABLE USES

The DCPA should link, document, or otherwise include information that aligns with ODE's Integrated Guidance regarding the allowable use of grant resources.

ACCOUNTABILITY

State resources under this guidance must be used for their intended purpose and meet a level of scrutiny for their impact, over time, to student well-being, academic achievement, and the goals established more fully in the Integrated Guidance. Each charter school, regardless of the scenario of configuration, holds responsibility along with their sponsoring entity, to meet these aims. ODE holds responsibility to make sure the right reporting practices and information is shared through sponsoring parties or directly to ODE for each program or fund source.

The DCPA should outline a clear understanding of how the charter school will be held accountable to the requirements of the funds and expected outcomes.

With the exception of virtual charter schools (given limited access to only some programs), charter schools must meet community engagement requirements when developing their plans. Charter schools should either be included in the district's community engagement or complete their own community engagement that will inform how the charter school plans to spend funds. This applies regardless of the configuration scenario.

Another aspect of accountability under this guidance is the development of Longitudinal Performance Growth Targets (LPGTs), progress markers, and optional local metrics.

Sponsoring districts and/or districts with state-sponsored charter schools located within their boundaries are responsible for and should include students within these charters in their performance reporting.

This is a change from prior guidance to ensure that each student realizes the benefit of state investments and to ensure the right relationship and partnering conditions for students in a given community. Charter schools may develop their own LPGTs and optional local metrics or plan to use the district's LPGTs. Details of performance agreements should be documented in the DCPA.

ODE will be responsible for the review of performance for charter schools who have direct awards of grant funding because they were eligible to apply independently.

REPORTING PROGRESS

The charter school should submit its progress toward meeting these targets in alignment with the district's reporting timeline and format requirements for ODE as documented in the DCPA

The district and the charter school should also include clear expectations regarding how the charter school will report expenditures of funds. How and when will the charter school submit programmatic and fiscal reports? (in alignment with the Options in Table B of this section) What happens if the charter school fails to expend funds according to the allowable uses and how will funds be returned to the district once the grant period has ended? How is the charter school accounting for funds and are the funds easily audited?

SECTION FIVE: CHECK YOUR WORK

- Have you checked the funding parameters for all funding streams and decided which program you will apply to with an integrated application?
- Have you checked whether you are able to receive funding for SIA as 1) an independent charter school; or 2) as a charter school participating with a district?
- If you are invited to participate in a district SIA application, have you contacted your district to make a plan for a joint needs assessment, community engagement, and joint plan/application?
- If you are eligible to receive SIA funding as an independent charter, have you made a plan to conduct a needs assessment, community engagement and an integrated plan/application?
- If you are receiving SIA funding through a district, have you drafted a DCPA between the charter school and the district?
- If you are receiving HSS or EIIS funding through your district, have you drafted a DCPA between the charter school and district?
- If you have been identified as receiving FSI assistance, have you submitted a budget and plan to your district to be submitted to ODE? (If a state sponsored charter school, have you submitted your budget and plan directly to ODE?)
- If you are a school serving students in grades 9-12 and are interested in participating in CTE funding, have you contacted the CTE Regional Coordinator in your area to determine if your district is a direct grant recipient or a consortia member for CTE and to find out more information about how to participate?