To: Charter Schools Office, New York State Department of Education

Fr: Michael Regnier, New York City Charter School Center

Re: Comments on Draft January 2012 Request for Proposals to Establish Charter Schools Authorized by the Board of Regents

December 19, 2011

On behalf of the New York City Charter School Center, I respectfully submit the following comments on the Draft Request for Proposals (RFP) referenced above.

Multiple Review Cycles
Acting on behalf of the Board of Regents, the State Education Department's (SED) decision to institute multiple annual review cycles is a positive step that will improve prospective applicants' options and flexibility, and one the Charter Center fully supports. That being said, there are conceivable risks to this approach that SED may be able to ameliorate.

First, multiple review cycles could result in unsuccessful Spring applicants routinely applying again for the Summer cycle. That could lead to Summer re-proposals that reflect a savvy response to Spring feedback more than underlying capacity, particularly if the double-review becomes a "corrections"-style dialogue between applicant and authorizer. The RFP should explicitly signal that this is not SED's intent for the multiple review cycles.

Second, multiple review cycles will complicate the problems of logistics and fairness that already surround prospective charter schools' efforts to procure the use of NYC DOE facilities. While it is not SED's job to make sure all new charter schools have a systematic and timely way of seeking DOE space, multiple approval rounds will nevertheless make this more difficult. The RFP should mention SED's position or non-position on this issue and describe any efforts to coordinate with DOE.

Third, the late timing of a Summer review cycle will significantly restrict the "lead time" available before approved schools must open. This should also be mentioned in the RFP as an important consideration for prospective applicants.

Letter of Intent Purpose and Page Limits
The RFP is not clear about the extent to which a submitted Letter of Intent will be screened for overall quality and potential, or merely for technical "completeness," and whether or not the month following the Letter of Intent deadline will potentially be a time of formal dialogue between applicant and authorizer.

For the Letter of Intent and other sections, it also would be useful for applicants to understand whether page limits are hard-and-fast rules that could trigger automatic disqualification.

NYC DOE Information
The inclusion of information provided by the NYC DOE (p. 10) is potentially beneficial to applicants, but it creates several points of potential confusion:

- The included information appears to imply that proposed middle schools will receive siting priority, although to our knowledge such a policy has not been confirmed;
- The brief mention of "Restart" schools is not sufficiently explained, particularly on the point that "replacement" of district schools is in this context very different than merely succeeding a phase-out school in the same space; and
- It is not clear whether Mr. Dunn is the appropriate contact for the penultimate paragraph as well as the last.

Public Outreach
It would be helpful to applicants if the RFP gave some indication of how much additional public outreach is generally expected to be completed between the Letter of Intent submission and the full application deadline (p. 24).

School Leader Recruitment
On p. 34, the RFP asks that applicants "discuss the desired qualifications and discuss any plans for the recruitment and selection of the school leader." In light of the importance of school leader identification and effectiveness to charter school viability, stronger language should be included here, for example to ask applicants to explain their expected criteria for school leader selection.

Standards
On p. 27, the RFP refers to "New York State Learning Standards, inclusive of the Common Core State Standards and the New York State Testing Program." A brief, additional explanation could help applicants understand the meaning of this phrase.

Terminology
We respectfully suggest that the phrase "mom-and-pop" not be used to refer to independent charter schools (p. 7), as it may unintentionally imply a lack of relative school quality or seriousness.