



April 7, 2014

The Honorable John Kline
Chairman
Committee on Education and the Workforce
2181 Rayburn House Office Building
Washington, DC 20515

The Honorable George Miller
Senior Democrat
Committee on Education and the Workforce
2101 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Kline and Senior Democrat Miller:

On behalf of the National Alliance for Public Charter Schools (National Alliance), I am writing to thank you for introducing H.R. 10, the Success and Opportunity through Quality Charter Schools Act. This bipartisan bill to reauthorize the Charter Schools Program (CSP) will strengthen public education by supporting the growth of high-quality public charter schools and increasing the educational opportunities for all students by supporting innovation in our public education system.

Many of our nation's most successful charter schools would not have been able to open their doors without the CSP program, and we are grateful that H.R. 10 will better target funds to states with laws that support the growth of quality public charter schools. In particular, we are thankful that the Amendment in the Nature of a Substitute to H.R. 10 proposes several key improvements to existing law, such as:

- Giving priority in the state grant competition to states that do not limit the growth of charter schools;
- Setting aside a portion of state grant awards to improve the quality of charter school authorizers;
- Formally creating a federal grant program to support the replication and expansion of high-quality charter schools;
- Making state charter support organizations eligible to receive grants and disburse sub grants;
- Clarifying and codifying in statute the Department of Education's recent weighted lottery guidance to allow schools to serve more educationally disadvantaged students;

The Honorable John Kline
The Honorable George Miller
April 7, 2014
Page 2

- Strengthening state application requirements to ensure that start-up funds are awarded to charter schools that meet the definition of a charter school, and not to schools that lack fundamental autonomy over budget, operations and personnel;
- Allowing students to remain within an existing network of charter schools as they move from elementary to middle to high school, without having to reapply through a lottery; and
- Providing increased flexibility for the use of start-up grant funds to design and open new public charter schools.

The National Alliance believes these policy changes will pave the way for more high-quality charter schools to begin serving students and families and help reduce the length of charter school waiting lists, which currently include nearly one million student names.

While the National Alliance supports H.R. 10, we also look forward to working with you and other Members of the Committee to further refine and improve the proposal, in the following areas, as it moves through the legislative process.

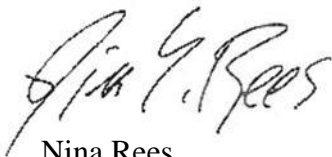
- Authorization Level – NAPCS asks that additional consideration be given to the overall authorization level for the Charter Schools Program, which the bill would cap at \$300 million for each year of the authorization. While we understand the difficult funding choices that Congress must make, the National Alliance believes an increased authorization level for H.R. 10 (including growth in the out-years) is needed to help meet the existing and growing parent demand for high-quality public school options and the major need for facilities support for public charter schools.
- Grant Awards – NAPCS has concerns about the implementation of grant awards under section 5203(c)(3), which would require the Secretary to “front-load” grants by wholly funding each grant awarded, without making continuation awards. The National Alliance is concerned that this provision may limit the Department of Education’s ability to hold grantees accountable, redirect funds from states that make fewer subgrants than anticipated, and impose on states the burden associated with more frequent more competitions.
- Priorities – To better support efforts to ensure equitable facilities policies at the state level, the National Alliance recommends that priority language be added to section 5203(f)(2) for a state that provides charter schools, or requires districts and cities to provide: funding for facilities; assistance with facilities acquisition; access to public facilities; the ability to share in bonds and mill levies; the right of first refusal to lease or purchase public school buildings; or low or no-cost leasing privileges to charter schools.

The Honorable John Kline
The Honorable George Miller
April 7, 2014
Page 3

- Uses of Funds – The National Alliance appreciates the Committee’s efforts to allow CSP funds to be used more flexibly so that school leaders are equipped to meet the unique needs of the communities they serve. While the language in H.R.10 is significantly more flexible than current law, we would like to ensure the language is interpreted as allowing for critical start-up costs. Flexibility is needed to allow Charter Schools Program funds to be spent not only on previously allowed expenses such as desks and books, but also on equally crucial items such as transportation, which is especially critical in rural communities.
- Replication and Expansion of High-Quality Charter Schools – We recommend that the funding available for charter management organizations to replicate and expand high-quality charter schools under section 5205(b) be more consistent with the level appropriated by Congress under the FY 2014 Consolidated Appropriations Act, which requires that the Secretary spend not less than \$45 million for this specific purpose. In addition, the application requirements for replication and expansion grants need to be clarified, as the purpose of this grant competition differs from the state grant competition, and it therefore requires different application requirements.

Thank you again for introducing bipartisan legislation to update and improve the Charter Schools Program. Charter schools are showing us that it is possible for all students – regardless of their backgrounds – to achieve at high levels and be prepared for college and life. We are pleased that the Committee will consider H.R. 10, the Success and Opportunity through Quality Charter Schools Act, and look forward to helping enact this critical legislation into law.

Sincerely,



Nina Rees
President and CEO
National Alliance for Public Charter Schools