

DISTRICT OF COLUMBIA PUBLIC CHARTER SCHOOL BOARD

Charter Actions Requiring a Vote

- Approve a Charter Application
- Approve a Charter Renewal (15 yrs.)
- Approve Charter Continuance (5 or 10 yrs.)
- Approve a Charter Amendment Request
- Approve a Charter Agreement
- Give a Charter Notice of Concern
- Lift the Charter Notice of Concern
- Commence Charter Revocation Proceedings
- Revoke a Charter
- Board Action, Other _____

Non-Voting Board Items

- Public Hearing Item
- Discussion Item
- Read into Record

Policies

- Open a New Policy or Changes to a Policy for Public Comment
- Approve a New Policy
- Approve Revisions to an Existing Policy

PREPARED BY: Rashida Young - Senior Manager, Equity and Fidelity

SUBJECT: Revisions to the DC Public Charter School Board's Enrollment Ceiling Increase Policy

DATE: March 19, 2018

Proposal

The DC Public Charter School Board (DC PCSB) staff recommends its Board vote to open for public comment on March 19 DC PCSB's revised Enrollment Ceiling Increase Policy (Attachment A). DC PCSB is scheduled to hold a public hearing on this matter on April 23, 2018 and will close the public comment period after the hearing is held. The Board will vote on the proposed revisions on May 21, 2018.

Written comments may be submitted until 5:30 p.m. April 23, 2018 by mail or email to:

DC Public Charter School Board
3333 14th Street NW, Suite 210
Washington, DC 20010
public.comment@dcpcsb.org

Summary of Revisions

DC PCSB staff proposes changes to the Enrollment Ceiling Increase (ECI) Policy to clarify standards DC PCSB's Board will consider when determining whether a school will be granted an enrollment increase. We also propose

these changes to ensure DC PCSB’s practices and the policy are aligned. The chart below provides an explanation of each proposed revision.

| Proposed Revised Policy | Current Policy | Notes |
|---|---|---|
| <p>Single campus LEAs with a single PMF that use the PK-8 or HS PMF must score Tier 1</p> <p>Multiple campus LEAs or campuses with two PMFs under the PK-8 and/or HS framework(s): Tier 1 on at least 2/3 of campuses, AND an overall PMF average of 50% or more over the past three years, AND no campus can be below 45%.</p> | <p>Elementary/middle and high schools must score 65 or greater on the most recent Performance Management Framework (PMF) for all currently operating campuses.</p> | <p>“65% or greater” is equivalent to “Tier 1.” For multi-campus LEAs, the thresholds listed (Tier 1, 2/3 of campuses, PMF average of 50%, and no campus below 45%) is based on feedback from schools.</p> |
| <p>Adult education schools must score Tier 1.</p> <p>Alternative Accountability schools must meet 100% of academic charter goals (student achievement and student progress) AND meet 100% of all school environment/ student engagement goals.</p> | <p>Schools not tiered must meet all the school’s PMF targets in the most recent school year for all operating campuses (or a Tier 1 rating for adult schools, once tiered).</p> | <p>This language is essentially the same.</p> |
| <p>Schools must demonstrate the case that there is demand for the expansion. The description of the scope, pace, and need for the ECI reflects knowledge of the current demographic and growth projections of the city, found here.¹</p> | <p>Rationale for the requested increase is taken into consideration.</p> | <p>The spirit of the new language is essentially the same. In addition, schools must be aware of citywide planning and growth as they make decisions on their own growth.</p> |
| <p>Schools must provide evidence that the school has engaged and responded to community stakeholders, including families, school staff, and in cases when the facility has already been identified, neighbors and the ANC(s).</p> | <p>No language included on community engagement.</p> | <p>This ensures schools are taking all stakeholders’ perspectives into consideration. (Note: this is not a requirement that all stakeholders support the request.)</p> |

¹ Analysis on Charter Programs, Need and Growth: <http://www.dcpsb.org/file/charter-programs-need-and-growth>

| Proposed Revised Policy | Current Policy | Notes |
|---|--|--|
| Schools must be in operation for at least three years. if undergoing a turnaround, the school must have completed its third year of turnaround. | Schools must be in operation for at least four years. | This change aligns DC PCSB's practice to the policy. There have been instances where schools younger than four years have made a sufficient case to the Board. This also addresses schools that have undertaken a DC PCSB-sanctioned turn-around effort as part of a condition of a review or renewal. |
| Schools must have a history of meeting enrollment projections (within at least 90% of enrollment projections for the two most recent years) at the LEA level. | Schools must have a history of meeting enrollment projections (within at least 80% of enrollment projections for the two most recent years). | Projecting enrollment accurately reflects a school's knowledge of the demand for its school. Last year, DC PCSB began sharing many analyses to show population changes to help schools more accurately determine demand. |
| Schools must have a re-enrollment/ retention rate as follows: -At least 85% for single campuses grades PK-12 -At least 85% for multi-campus local education agencies (LEA), calculated as the average of all campuses' rates -Retention ² rate of at least 65% for adult schools. | Schools must have a re-enrollment rate of at least 80% at all operating campuses (for grades Pre-K through 12 th only). | The rate was increased to 85% based on increased sector-wide performance on the PMF. Additionally, we want to ensure schools are working to keep current families enrolled, not only depending on new families to fulfill enrollment. |
| School's status on the most recent Financial Audit Review is not "Requires Additional Monitoring." | Schools must have a score of High Fiscal Performer on the Financial Audit Review (Fiscal 1). | Language is updated to reflect new language used in the Financial Audit Review. |
| School has not been issued a Notice of Concern within the past 6 months. | Schools must not currently be under corrective action. | Schools gave feedback that the original language was unclear. |
| Schools may not have any "not compliant" ratings on the most | Schools must be fully compliant on all indicators in the school's | This revision allows schools actively "in progress" of |

² PMF Tech Guide definition of retention: Retention measures the percentage of students who stay at an adult education school long enough to complete a single cycle of instruction.

| Proposed Revised Policy | Current Policy | Notes |
|--|---|--|
| recent Compliance Review report. | most recent Compliance Review report. | fixing compliance issues to be eligible. |
| If beyond year nine of operation, the school is fully accredited. | If beyond Year Five of operation, the school must be accredited. | Language is updated to align to DC PCSB's revised Accreditation Policy, which mandates accreditation after nine years. |
| For PK-12 schools, historically underperforming subgroups ³ must perform at or above the city average on the state assessment for that subgroup OR have a median growth percentile score at or above the city average for that subgroup. For campuses ending in grade 3 or below, a score of at least 50 on the K-3 Growth Assessment is required. | No language included on subgroup performance or growth. | This ensures there is focus on reducing the achievement gap. Language about the K-3 Growth Assessment was added in response to school leader feedback. |
| Rate of exclusionary discipline (for ALL students; at-risk students; and students with disabilities) must not be an outlier ⁴ as defined by the interquartile formula. The rate of exclusionary discipline for at-risk students or students with disabilities must not be triple the rate of their non-subgroup peers the previous school year. | No language included on discipline. | This language has been added in response to feedback from parents and other community stakeholders. |
| For ECI requests that are very small in size (e.g., fewer than 10 students or less than a 5% increase of total enrollment size), the Board may use discretion in waiving some of the criteria. | Size and pace of the requested increase are taken into consideration. | This change aligns DC PCSB's practice to the policy. |
| In cases where a school is requesting an ECI due to an asset acquisition, the Board | No language included on school asset acquisitions. | In the case of asset acquisitions, the LEA must |

³ Subgroups: Black Non-Hispanic; Hispanic/ Latino; Economically Disadvantaged/ At-Risk; SPED; EL. These groups will be identified following OSSE's business rules.

⁴ Outlier categories are calculated by charter sector grade band and school type: PK-5, 6-8, 9-12, Alternative, and Adult

| Proposed Revised Policy | Current Policy | Notes |
|---|--|--|
| may use discretion when assessing criteria met. | | meet ECI policy criteria for those grades which the acquired school served (e.g., a PK-12 LEA that is acquiring a PK-5 school will be assessed on its PK-5 campuses). |
| Schools may apply for and receive an enrollment ceiling increase prior to securing a facility. ECIs are now time-bound and the school must secure a facility and begin enrolling students within 24 months of the Board’s vote. | Schools must have access to a facility to accommodate the projected enrollment (as demonstrated through a lease). | In many cases, a school is unable to gain access to a facility until DC PCSB has granted the enrollment ceiling increase. Having a facility prior to being granted does not allow for adequate community engagement. |
| Wait list data is not included as criteria in the policy. | Schools must have evidence of a wait list of at least the number of students planned in the enrollment increase. | Re-enrollment and enrollment projections are included in the policy, which provide sufficient data on demand. In making the case for why there is a need for the ECI, schools are welcome to cite waitlist data. |
| Schools must meet criteria for academic performance, case for demand, and community engagement. Schools that meet these criteria, but miss up to two other criteria, may still be considered for the ECI based on historical trends, severity and scope of missed indicators, and school’s response to resolving the issue. | The following factors were considered for all schools: trends in academic performance, Qualitative Site Review (QSR) results, size and pace of the requested increase, and rationale for the requested increase. | These criteria provide up to date information on school quality and trending performance. |

The new language can be found in the attached policy (Attachment A).

Stakeholder Engagement

DC PCSB’s goal was to create a policy that the Board, school leaders, and other stakeholders feel is fair criteria for expansion. To this end, we sought feedback from stakeholders in various ways, including the following:

- Charter Leaders Meeting, 9/29/17
- School Leader ECI Policy Survey, 10/6/17
- Meeting with the Parent and Alumni Leadership Council, 10/10/17
- ECI Policy Taskforce Meeting #1, 11/16/17
- ECI Policy Taskforce Meeting #2, 1/23/18
- ECI Policy Taskforce Meeting #3, scheduled for 3/21/18

Over the last several months, our staff conducted various data analyses to determine if the proposed criteria were fair and attainable. We also conducted analyses for metrics schools suggested to be used. We shared many of these analyses with schools including: the interquartile outliers for suspension analyses; suspension disproportionality analyses; suspensions removing weapons analyses; and full policy criteria analyses.

Policy Background

Pursuant to the School Reform Act, D.C. Code 38-1802 et seq., a charter school must submit a petition to revise its charter, which includes its enrollment ceiling.

Attachments

Attachment A: Proposed Revised Enrollment Ceiling Increase Policy

Attachment B: Current Enrollment Ceiling Increase Policy

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|--|
| Date: _____ PCSB Action: _____Approved _____Approved with Changes _____Rejected Changes to the Original Proposal: _____ _____ _____ |
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Attachment A
Proposed Revised Enrollment Ceiling Increase Policy

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|--|--|
| POLICY TITLE: Enrollment Ceiling Increase Policy | |
| ADOPTION/EFFECTIVE DATE: October 31, 2010 July 3, 2012 (Revised) March 23, 2015 (Revised) | MOST RECENTLY UPDATED: March 19, 2018 |

POLICY

Every year, the DC Public Charter School Board (DC PCSB) will consider school applications for enrollment ceiling increases (ECI). Schools with prior performance that meet the criteria listed below will generally be approved for the increase. For ECI requests that are very small in size (e.g., fewer than 10 students or less than a 5% increase of total enrollment size), the Board may use discretion in waiving some of the criteria below. The Board may also use discretion for school takeovers. In these cases, the LEA must meet criteria for campuses with grades served which are the same as the grades of the school which will be taken over.

New to this policy is a change in timeline. Previously, DC PCSB encouraged schools to find a facility and then apply for an increase. This is revised. Schools may now apply for and receive an enrollment ceiling increase prior to securing a facility. However, enrollment ceiling increases are now time-bound and the school must secure a facility and begin enrolling students within 24 months of the Board’s vote. Failure to secure a facility within that timeframe will result in the ceiling increase expiring unless extended by a vote of the Board.

All schools that wish to be considered for an enrollment ceiling increase must demonstrate the following:

- 1) Performance:
 - i. Tier 1 for single campus LEAs with a single Performance Management Framework (PMF) that use the PK-8 or HS PMF⁵
 - ii. Tier 1 for adult education schools
 - iii. For multiple campus LEAs or campuses with two PMFs under the PK-8 and/or HS framework(s): Tier 1 on at least 2/3 of campuses, AND an overall PMF average of 50% or more over the past three years, AND no campus can be below 45%

⁵ For Indicator A, the most recent PMF; goals assessment from the previous school year.

- iv. For Alternative Accountability schools: meet 100% of academic charter goals (student achievement and student progress), AND meet 100% of all school environment/ student engagement goals.
- 2) A compelling case that there is demand for the expansion. The description of the scope, pace, and need for the enrollment ceiling increase reflects knowledge of the current demographic and growth projections of the city, found [here](#).⁶ Note that DC PCSB does not consider school financial issues as a need.
- 3) Evidence that the school has engaged and responded to community stakeholders, including families and school staff. If a new facility has already been identified or the expansion will be accommodated in the school's current facility, the school has demonstrated engagement with neighbors and any impacted advisory neighborhood commission (ANC).

If a school satisfies all three items above, the Board will review the application based on the indicators listed on the following pages. This chart outlines how staff will recommend to the Board:

| Staff Recommendation | School Performance |
|--|---|
| Recommend Approval | The school meets items A-C and demonstrates achievement in all applicable indicators below |
| Consider Application and, pending analysis, recommend Approval with Conditions or Denial | <p>The school meets items A-C and misses no more than two applicable indicators below for PK-12, and no more than one for Adult and Alternative⁷. Factors that staff will consider when recommending approval with conditions are:</p> <ul style="list-style-type: none"> • Historical trend shows improvement (three years) • The severity and scope of the missed indicator(s) is such that it can be corrected prior to the enrollment ceiling going into effect • School's response to resolving the issue(s) shows deep prior knowledge and understanding of situation and school has already taken significant steps to improve |
| Recommend Denial | The school does not meet items A-C and/or misses more than two indicators below for PK-12 and more than one for Adult and Alternative |

⁶ Analysis on Charter Programs, Need and Growth: <http://www.dcpsb.org/file/charter-programs-need-and-growth>.

⁷ Adult and alternative schools have fewer indicators including subgroup assessment performance.

Indicators

- 1) In operation for at least three years; if undergoing a turnaround, the school must have completed its third year of turnaround.
- 2) A history of meeting budgeting enrollment targets (within at least 90% of budgeted enrollment projections for the two most recent years) at the LEA level.
- 3) Re-enrollment rate (PMF rate and business rules when applicable):
 - i. At least 85% for single campuses grades PK-12
 - ii. At least 85% for multi-campus local education agencies (LEA), calculated as the average of all campuses' rates
 - iii. Retention rate of at least 65% for adult schools.
- 4) School's status on the most recent Financial Audit Review is not "Requires Additional Monitoring."
- 5) School has not been issued a Notice of Concern within the past 6 months.⁸
- 6) No "not compliant" ratings on the most recent Compliance Review report.
- 7) If beyond year nine of operation, the school is fully accredited. If beyond year seven, the school is in the candidacy phase per the accreditation agency.
- 8) Subgroup performance for PK-12 schools⁹:
 - For single campus LEAs, historically underperforming subgroups¹⁰ must perform at or above the city average on the state assessment for that subgroup OR have a median growth percentile (MGP) score at or above the city average for that subgroup. For schools ending in grade 3 or below, score of at least 50 on the K-3 Growth Assessment in both reading and math.
 - For multiple campuses or campuses with two PMFs under the PK-8 and/or HS framework(s), at the LEA-level, historically underperforming subgroups must perform at or above the city average for that subgroup on the state assessment OR have an MGP score at or above the city average for that subgroup. For campuses ending in grade 3 or below, LEA average score of at least 50 on the K-3 Growth Assessment in both reading and math.
- 9) Rate of exclusionary discipline for the following groups at each campus is not an outlier¹¹ the previous school year, as defined by the interquartile formula¹²:

⁸ From the date of the ECI charter amendment public hearing

⁹ Only applicable with a minimum of 25 test takers

¹⁰ Subgroups: Black Non-Hispanic; Hispanic/ Latino; Economically Disadvantaged/ At-Risk; SPED; EL. These groups will be identified following OSSE's business rules.

¹¹ Outlier categories are calculated by charter sector grade band and school type: PK-5, 6-8, 9-12, Alternative, and Adult

¹² To calculate the IQR (75th percentile – 25th percentile): compute (25th percentile – (1.5 x IQR)) and (75th percentile + (1.5 x IQR)); anything outside this range (referred to as 1.5 x the Interquartile Range) is an outlier.

- i. ALL students
 - ii. At-risk students
 - iii. Students with disabilities
- 10) Rate of exclusionary discipline at the LEA level for at-risk students or students with disabilities is not triple the rate of their non-subgroup peers the previous school year (flag lifted if the rate is at or below the sector average for that subgroup and grade band).

Attachment B Current Enrollment Ceiling Increase Policy

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|--|---------------------------------------|
| POLICY TITLE: Enrollment Ceiling Increase Policy | |
| | |
| ADOPTION/EFFECTIVE DATE: October 31, 2010 July 3, 2012 (Revised) | MOST RECENTLY UPDATED: March 23, 2015 |
| | |

POLICY

A school must meet the following minimum criteria¹³ in order to be considered for an enrollment ceiling increase request. For multi-campus schools, the criteria listed below are only for the campus for which the expansion is being requested.

- 4) Access to a facility to accommodate the projected enrollment (as demonstrated through a lease);
- 5) A history of meeting enrollment projections (within at least 80% of enrollment projections for the two most recent years);
- 6) Currently not under corrective action;
- 7) A score of High Fiscal Performer on the Financial Audit Review (Fiscal 1)¹⁴; and
- 8) If beyond Year Five of operation, the school is properly accredited.

PCSB staff will generally recommend FOR an enrollment increase in the following cases:

- 1) For elementary/middle and high schools, a score of 65 or greater on the most recent PMF for all currently operating campuses¹⁵;
- 2) For schools not tiered meeting all of the school's PMF targets in the most recent school year for all operating campuses¹⁶ (or a Tier 1 rating for adult schools, once tiered);
- 3) Re-enrollment rate of at least 80% at all operating campuses (for grades Pre-K through 12th only);
- 4) Evidence of a wait list of at least the number of students planned in the enrollment increase;
- 5) Fully compliant on all indicators in the school's most recent Compliance Review report; and
- 6) In operation for at least four years.

¹³ For schools with a PMF score and an Accountability Plan, both criteria parts of criteria 1 must be met.

¹⁴ The FAR replaces the Charter Audit Resource Management (CHARM) as PCSB's evaluation tool for school finance. A score of "Fiscal 1" is equivalent to the highest category on the CHARM.

¹⁵ Or the equivalent of Tier 1 for the Pre-K—8th grade PMF upon its completion

¹⁶ For the Early Childhood and Adult PMF, until tiered, "meeting targets" equates to at minimum scoring at the floor of the given target.

PCSB staff will generally recommend AGAINST an enrollment increase in the following cases:

- 1) For all schools tiered on the PMF, a score of less than 50 on the most recent PMF;
- 2) For schools not tiered, meeting less than 2/3 of their goals and student academic achievement expectations;
- 3) Re-enrollment rates of lower than 65% (for grades Pre-K through 12th only) and adult education schools with net attrition greater than 25%;
- 4) No evidence of a wait list;
- 5) Having any *Not Compliant* or uncured *In Progress* ratings on the most recent Compliance Review report; and
- 6) A school in its first year of operation.

In the following situations PCSB will base its decision on the totality of all factors:

- 1) PMF scores of between 50 and 64 on the most recent PMF or adult education schools with 65% in all but one indicator;
- 2) For schools not tiered, earning at least 2/3 but not 100% of their goals and student academic achievement expectations;
- 3) For schools with three years or fewer of operating history; and
- 4) For schools not yet accredited after their 5th year of operation.

In addition, all requests for enrollment increases will consider the following factors:

- a) Trends in academic performance;
- b) Results of qualitative assessments of academic quality and operational capacity, such as Qualitative Site Reviews (QSRs) or other instruments to be developed by PCSB; (this is particularly important for schools with three years or fewer of operating history);
- c) Size and pace of the requested increase; and
- d) Rationale for the requested increase.