



June 3, 2019

BY EMAIL

Dear Benjamin Payne,

Thank you for submitting an application to establish a public charter school in the District of Columbia. The District of Columbia Public Charter School Board (DC PCSB) has completed the Spring 2019 Application Review process and, at its public meeting held on May 20, 2019, did not approve your application to establish Anna Julia Cooper Public Charter School.

DC PCSB's decision was based on a thorough evaluation of the written application and information gathered from the capacity interview and the public hearing. The reasons for this decision are specified in the attached memorandum, captured in the assessment of the applicant's weaknesses and subsequent analysis.

Should you choose to file a petition again, that petition must meet the requirements of the School Reform Act, D.C. Code § 38-1802.02. Specifically, it should appropriately resolve the deficiencies cited above and meet the standards for approval in each component of the application rubric: (a) a demonstrated need for the school; (b) sufficient progress in developing the plan; (c) alignment of the entire school program with the school's mission and philosophy; (d) inclusion of and adequate support for special populations; and (e) the founding group's capability to ensure that the school can meet the educational objectives outlined in the application. If you would like, DC PCSB staff would be happy to discuss with you in more detail your application's strengths and weaknesses.

Should you want to appeal the denial of your application, you may seek review of this decision pursuant to D.C. Code § 38-1802.03(j).

We recognize the hard work and effort that went into the development of your application. Thank you for your interest in public charter schools and your commitment to improving public education in Washington, DC.

Sincerely,



Scott Pearson
Executive Director
DC Public Charter School Board



Rick Cruz
Chairman
DC Public Charter School Board

Attachment: Vote Memo

DISTRICT OF COLUMBIA PUBLIC CHARTER SCHOOL BOARD

Charter Actions Requiring a Vote

- Approve/Deny 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 an Amendment to an Existing Policy

PREPARED BY: Jessica Taguding – Senior Data Analyst, Equity and Fidelity Team

SUBJECT: Charter Application – The Anna Julia Cooper School –_Vote Memo

DATE: May 20, 2019

The following application to open a public charter school in the District of Columbia beginning in school year 2020-21 was submitted to the DC Public Charter School Board (DC PCSB) on March 11, 2019. It was released for public comment from March 11, 2019 through April 22, 2019, and a public hearing occurred on April 23, 2019. DC PCSB notified Advisory Neighborhood Commissions and the public via the DC Register, two newspapers, and the DC PCSB website, where the application and the hearing information were posted on March 11, 2019.

Board Action

DC PCSB staff requests that the Board vote to approve or deny the Anna Julia Cooper School (The Cooper School) charter application.

Background

The Cooper School founding team seeks to open a diverse by design school providing a classical liberal arts education to students in grades kindergarten (K) through 12. The school aims to develop the minds and hearts of its students through study of traditional core subjects in a “virtue-based” school culture. The Cooper School will be supported by the Barney Charter School Initiative (BCSI), an outreach program of Hillside College. Though BCSI is not a management organization, the Cooper School will enter into a contract with Hillside College to receive curriculum and professional development support free of charge in

exchange for maintaining certain “key characteristics” pertaining to the BCSI classical liberal arts model.¹

The school’s founder and proposed head of school is Benjamin Couch Payne, a Project Officer with BCSI who founded and led Savannah Classical Academy, a BCSI charter school in Savannah, Georgia, between 2013 and 2018. Other members of the founding team include Dr. Hannah Wegmann, a French instructor at the University of Maryland, Capitol Hill parent, and Hillsdale College alumna; Marvin Harden, Managing Director at See Forever Foundation and Maya Angelou Public Charter School (PCS); Mary Riner, a DC educational advocate who helped open BASIS DC PCS; Jasmine Jones, former Senior Operations Manager at Breakthrough Montessori PCS and Parents Amplifying Voices in Education (PAVE) Board Member; Erika Jackson, Dean of Student Support with DC Prep PCS; Dr. Danielle Palmer, a DC-based school psychologist; and other education professionals with experience in special education, legal services, data analytics, classroom instruction, and family engagement.

Name of Applicant Group	The Anna Julia Cooper School ²
Mission and Program	The school's mission is: “The training of the head, hand, and heart of K-12 youth in Washington, DC through a content-rich classical education in the liberal arts and sciences with instruction in the principles of moral character and civic virtue, nurturing good and self-governing citizens.”
Grade Span	K-12
Proposed Enrollment	The school plans to open in school year (SY) 2020-21 with 216 students in grades K-4. The school will add one grade (44 students) per year, reaching capacity in SY 2028-29 with 568 students in grades K-12 (maintaining 44 students in each grade level). The Cooper School will accept new students in all grade levels, including mid-year student transfers.
Target Population	As a diverse by design model, the school anticipates a student population that is 46% African American, 8.5% Hispanic/Latino, and 37% White. The school expects that 40% of students will be economically disadvantaged, though expressed a desire to use targeted outreach to increase the proportion of low-income families. The school's application cited BASIS DC PCS, Washington Latin PCS, and Two Rivers PCS when describing its expected student population.

¹ The proposed agreement, which lists each of the ten key characteristics, can be found on p. 206 of the redacted application: <https://dcpcsb.egnyte.com/dl/TrUSXilyZP/>

² The redacted Anna Julia Cooper Public Charter School Application may be found here: <https://dcpcsb.egnyte.com/dl/TrUSXilyZP/>

Desired Location	While the school has not yet secured a facility, the team would ideally like to locate in Ward 6 to be attractive to families in Wards 5, 6, 7, and 8.
Unique Elements of the Education Program	The Cooper School intends to offer students a classical model of liberal arts education, with a curriculum including the study of primary texts, content-rich study of math and sciences, the integration of the arts across disciplines, and Latin instruction. Instructional methods will be principally informed by the Socratic Method, which employs a combination of questions, comments, and class discussion to foster deep content understanding and powerful learning habits. The school will implement a virtue-based school culture to develop moral character in students. The Cooper School intends to encourage family and civic engagement through opportunities for parent volunteering and partnerships through which students will serve the local community. The Cooper School will also train teachers on trauma-informed instruction, mindfulness, and restorative practices. The executive summary, which provides an overview of the program, can be found here: https://dcpcsb.egnyc.com/dl/QuxJO0laHu .
Community Support	<p>DC PCSB has received letters of support for the Cooper School from approximately 20 local families and community members, including Ashley C. MacLeay, a parent who is also the at-large representative of the DC State Board of Education (SBOE). Two individuals spoke in support of the Cooper School at the April 23 Public Hearing.</p> <p>In addition, three local organizations have submitted letters of support: Restorative DC, DC Central Kitchen, and Dharma Yoga. (Mary Riner, a founding Cooper School team member, was a founding board member of Dharma Yoga.)</p> <p>Finally, DC PCSB has received an additional eight letters of support from current or former staff of the Savannah Classical Academy.</p> <p>All public comment received regarding the application can be found here: https://dcpcsb.egnyc.com/fl/00nWQWRuAp.</p>

The applicant's strengths include:

- Consistency of mission and philosophy: The Cooper School philosophy of classical education, virtue-based school culture, and family/community

engagement is clearly reflected throughout the entirety of the application. The application describes a strong school culture built upon trauma-informed instruction, mindfulness, and restorative justice. DC PCSB has received a letter of support from Restorative DC (a program of SchoolTalk) demonstrating commitment to the school's restorative justice program. Furthermore, the application describes several strategies likely to produce robust family engagement, including frequent communication to parents, a proposed partnership with Flamboyan, volunteer opportunities for parents and students, and family therapists.

- Well-articulated Response to Intervention (RTI) plan: The application team described a clear three-tiered RTI plan in the written application and capacity interview. The RTI frameworks will support students requiring additional academic or behavioral support, as well as students with an Individualized Education Program (IEP). Students in grades K-6 will receive targeted interventions during “Anna’s Hour” each day. The Cooper School plans to hire one Special Education teacher per grade level; Special Education teachers will assist with lesson planning and co-teach alongside general instruction faculty so that students with disabilities are supported in the general education classroom settings. During the capacity interview, the applicants described integrating parents into the RTI process to ensure that student progress is monitored throughout the year.
- Well-planned governance: The application describes several strategies for board oversight. The school’s board will create governance, audit/financial, and risk management oversight committees. Board meetings will be open and accessible to the public to encourage family engagement. Each year, the board will approve a list of goals developed by the Head of School and will review benchmark metrics monthly. The board will also perform a Comprehensive Needs Assessment (CNA) and School Improvement Plan (SIP) annually. The board plans to invest in support through partnerships, such as Charter Board Partners and EdOps, and will receive support from Hillsdale College through the BCSI partnership.
- Well-developed and appropriate staffing plan for elementary school (grades K-6): The Cooper School presented a staffing model appropriate for its size and educational plans for grades K-6, including hiring one Special Education teacher per grade of 44 students and hiring additional staff to support the instruction of classics and gifted studies. The applicant plans to hire teachers with two or more years of teaching experience, with preference given to teachers with experience in DC or with similar student demographics. The school will maintain a mix of experienced and new teachers through a partnership with Urban Teaching Fellows. Teachers

will be formally observed several times throughout the year to ensure high-quality instruction.

The applicant's weaknesses include:

- Founding leader experience: The proposed Head of School, Benjamin Couch Payne, founded and led the Savannah Classical Academy (SCA) from 2013 to 2018. The school received a score of "F" from the Georgia Department of Education (GA DOE) for its first four years and was ultimately placed on probation for academic and organizational concerns. To better understand the circumstances around the school's probation, DC PCSB reached out to the GA DOE, who shared communications between SCA and the GA DOE preceding and following the probation.³ The earliest provided communication from the GA DOE articulates several areas of concern.⁴ The letter describes a lack of adequate due process procedures for students, which was particularly relevant given the GA DOE's concerns around the counseling out of students with academic and behavioral challenges, also described in the letter:

On SCA's website, there is a statement that parents are required to sign stating, "I understand that Savannah Classical Academy will implement all reasonable interventions related to academics and behavior. If these documented interventions are not successful, the administration may recommend that a child be withdrawn from Savannah Classical Academy." Public schools do not have the right to counsel students out of attending a public school due to academic or behavioral performance. If there are serious concerns with behavior, the school must follow due process procedures as detailed above... This is especially concerning because of the special education implications. Under the Individuals with Disability Education Act (IDEA), charter schools are required to provide tiered levels of support through the full spectrum on special education services for all potential areas of disability including, but not limited to, learning disabilities and behavioral disabilities.

The GA DOE letter describes additional concerns regarding SCA's special education policy, particularly school materials implying that students required a medical diagnosis to qualify for services. The applicant team addressed the academic concerns with a supplemental memo analysis of SCA's academic performance, attributing the "F" scores to misalignment

³ All documents provided by the GA DOE are available here:
<https://dcpcsb.egnyte.com/fl/Fx5Y6dCP0x>

⁴ The full letter from the GA DOE to SCA, dated 2/3/2017, is available here:
<https://dcpcsb.egnyte.com/dl/344hNZOJRs>

between the Georgia Milestones Assessment System (GMAS) and the SCA curriculum, primarily in science and social studies, as well as annual changes to the GMAS during that time.⁵ When SCA realigned its curriculum to state standards in SY 2017-18, the school received a “B,” which Mr. Payne points to as evidence that the poor historic results were merely the result of this curricular misalignment. However, it is worth noting that Louis Erste, Associate Superintendent for Policy and Charters at the GA DOE, stated to DC PCSB staff on April 24, 2019 that Mr. Payne was warned as early as SCA’s charter application process that the curriculum’s misalignment to Georgia state assessments would damage the school’s ability to meet its stated charter goals. The applicant team never fully addressed the IDEA and due process components of SCA’s probation, stating in its supplemental materials simply that “in no way or at any time did SCA fail to serve its students or violate any statute of IDEA or state, federal or local discipline policy.”⁶ The lack of reflection on the part of the school leader regarding due process and IDEA compliance raises concerns about the founding team’s ability to maintain a compliant school which serves all students.

- Insufficient evidence of demand: The written application provided anecdotal evidence of demand for the school, including informal surveys and conversations with families indicating early interest in a classical school serving grades K-12. Much of this outreach appeared to center on Capitol Hill parents, and it was unclear if these families represented the diversity that the school intends to have, including the 40% or more at-risk students the school is targeting. During the capacity interview, the team described word-of-mouth as the primary vector for reaching students, along with meetings that occurred at places such as Busboys and Poets, in Wards 7 and 8, yet provided little concrete evidence tying community demand to the Cooper School’s proposed model. During the public hearing, the applicant team described a potential student base coming from DC students who are currently homeschooled or participating in the DC Opportunity Scholarship Program. While the applicant team stated that they had held meetings with these groups, the team did not provide any indication that these students intend to leave their current educational environment for the proposed Cooper School.
- Insufficiently developed middle and high school educational plans: The written application’s educational plan for middle and high school was not as fully developed as the elementary school plan. It is unclear that an

⁵ The supplemental analysis of SCA’s performance can be found here: <https://dcpcsb.egnyte.com/dl/w9oJJu5IoT>

⁶ The full supplemental memo can be found here: <https://dcpcsb.egnyte.com/dl/uyRtIiMjpk>

enrollment of only 44 students per grade at the high school level can support the comprehensive high school course and extracurricular offerings laid out in the application. Furthermore, no member of the founding team has direct administration experience in a fully implemented high school.⁷

- Financial planning and oversight capability: DC PCSB identified an inconsistency between the planning year/first year budget and the five-year budget and requested that the applicant team submit corrected budgets. The applicant team’s supplemental memo noted that it uncovered a typo in the planning year budget (lines 18 and 19) and contained a corrected spreadsheet.⁸ However, the revised budget still contained the original inconsistency, which raised concerns about the founding team’s ability to effectively oversee the finances of the school, even with the support of partner organizations such as EdOps, with whom the founding team is currently contracting. Additionally, it is important that the school’s local board maintain full autonomy over the school. Staff expressed concerns about the ability of the school to operate independently of BCSI support, which will provide free professional development (including a two-week classical curriculum and instructional methods training for all teachers), staff coaching, and curriculum development services to the school.⁹ It is unclear how the school would absorb these costs in the event that the contract with Hillsdale College were terminated by either party.

Analysis

Using the standard for approval laid out in [DC PCSB’s 2019 Charter Application Guidelines](#),¹⁰ DC PCSB staff has completed an analysis based on the school’s written application, capacity interview, and public hearing. A more detailed breakdown of this assessment can be found below.

Criteria	Met/Not Met ¹¹	Notes
Demonstrated Need for the School	Not Met	To demonstrate the need for their program, the applicant team

⁷ When Mr. Payne left SCA in SY 2017-18, the school served students through 10th grade.

⁸ The updated planning year budget can be found here:

<https://dcpcsb.egnyte.com/dl/00MH38oVgk>

⁹ The proposed agreement can be found on p. 206 of the redacted application:

<https://dcpcsb.egnyte.com/dl/TrUSXilyZP/>

¹⁰ 2019 Charter Application Guidelines, pages 14-15:

<https://www.dcpcsb.org/sites/default/files/report/2019%20Charter%20Application%20Guidelines%2010-07-2018.pdf>

¹¹ This analysis evaluates whether each applicant group met, substantially met, or did not meet the standard for approval. When an applicant has substantially met the standard for approval, staff has concluded that they have met approximately 75% or more of the standard included in DC PCSB’s guidelines.

Criteria	Met/Not Met ¹¹	Notes
		<p>described low student achievement in Ward 6 and long waitlists at charter schools which incorporate the liberal arts into their models: BASIS DC PCS (Ward 2), Washington Latin (Ward 4), and Two Rivers PCS (Wards 5 and 6). The application also provided anecdotal evidence of demand among Capitol Hill families for a classical K-12 school. However, the application failed to demonstrate significant concrete support for the proposed school's model, particularly outside of Capitol Hill and among its described target student population. Further, given the school's proposed grades, it is unclear whether the applicant understands the unique characteristics of DC's education landscape, particularly the wants and needs of low-income families it aims to attract.</p>
<p>Sufficient Progress in Developing the Plan</p>	<p>Not Met</p>	<p>While the application provides a well-developed curriculum, staffing plan, and RTI framework structure for grades K-6, the plan fails to provide the same level of clarity for the middle school and high school programs. The application describes Anna's Hour as dedicated time for advanced and remedial learning in grades K-6, but provides far fewer details on the specifics of how such supports would be incorporated into middle and high school student schedules. Given that the school's application includes the middle and high school program, the underdevelopment of these programs is a severe concern.</p> <p>In addition, it is unclear that the proposed enrollment model is sufficient to support the comprehensive high school plan described in the application.</p>

Criteria	Met/Not Met ¹¹	Notes
Alignment with the Mission and Philosophy	Met	The application consistently weaves the core characteristics of classical education, virtue-based culture, and family engagement throughout the application. The proposed instructional method (the Socratic Method) and the selected curricula align with this vision. The applicant team has demonstrated a willingness to adapt existing curricula to meet the needs of DC students, primarily by expanding the proposed literature to include more authors of color whose works address issues of relevance to the school's target population.
Inclusiveness	Met	The application describes a three-tiered RTI plan which will address behavioral and academic challenges. The school intends to hire appropriate staff to meet the needs of English Learners and students with disabilities, and to use co-teaching to ensure that students with disabilities are able to participate fully in the Cooper School's program. The school commits to receiving new students in all grades and accepting mid-year transfers. "Anna's Hour" will be used to serve a variety of differing student needs in grades K-6, from remediation to advanced studies.
Founding Group Ability	Not Met	While the founding team presents an array of experience in areas such as classroom instruction, student trauma, finance, operations, legal services, community outreach, special education, and DC charter start-up, concerns about the ability of proposed school staff remain. The selected Head of School has no experience running a successful school, with the BCSI K-12 school in Georgia failing to meet performance expectations for the majority of his tenure as school leader. Additionally, the struggle to reconcile budget

Criteria	Met/Not Met ¹¹	Notes
		inconsistencies left DC PCSB staff concerned about finance expertise and oversight.

Resources

Anna Julia Cooper Spring 2019 Charter Application, found here: <https://dcpcsb.egnyte.com/dl/TrUSXilyZP/>

Anna Julia Cooper Spring 2019 Charter Application Public Hearing Transcript, found here: <https://dcpcsb.egnyte.com/dl/RSEvdN8ZKd>

Anna Julia Cooper Spring 2019 Charter Application Public Comment, found here: <https://dcpcsb.egnyte.com/fl/00nWQWRuAp>

Anna Julia Cooper Spring 2019 Charter Application Capacity Interview Transcript, found here: <https://dcpcsb.egnyte.com/dl/B9QKb6lgKD>

Anna Julia Cooper Spring 2019 Charter Application Executive Summary, found here: <https://dcpcsb.egnyte.com/dl/QuxJO0laHu>

Anna Julia Cooper Spring 2019 Charter Application Additional Submission: Post-Capacity Interview Memo to PCSB, found here: <https://dcpcsb.egnyte.com/dl/uyRtliMjpk>

Anna Julia Cooper Spring 2019 Charter Application Additional Submission: Savannah Classical Academy Performance 2014-2018, found here: <https://dcpcsb.egnyte.com/dl/w9oJJu5loT>

Anna Julia Cooper Spring 2019 Charter Application Additional Submission: Post-Public Hearing Memo to PCSB, found here: <https://dcpcsb.egnyte.com/dl/KfXAR2tUyy>

Anna Julia Cooper Spring 2019 Charter Application: Materials received from the GA DOE, found here: <https://dcpcsb.egnyte.com/fl/Fx5Y6dCP0x>

Date: 5/20/19

PCSB Action: Approved Approved with Changes Rejected

Changes to the Original Proposal:

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