



The Honorable David Grosso
Chairman, DC Council Committee on Education
1350 Pennsylvania Ave NW, Suite 402
Washington, DC 20004

DC Public Charter School Board Report on the Use of Per-Pupil At-Risk Funds in DC Public Charter Schools

Pursuant to the requirement in the FY16 Budget Support Act, the DC Public Charter School Board (PCSB) submits the following report on “the distribution of at-risk funds to each local education agency (“LEA”)...which should include at a minimum the allocation to each LEA, a specific breakdown on how that money was spent, including a description of what programs, initiatives, and the enrichment activities it supported”.

To fulfill the requirements of this report, PCSB issued a survey to all public charter LEA’s serving grades pre-kindergarten (PK) through 12. The survey was not issued to adult education and alternative LEA’s, as these LEA’s are not eligible for at-risk funds. In total 27 of the 55 LEA’s with PK-12 programs responded to the survey, a response rate of 49%.

Before examining the results of the survey it is important to note that the School Reform Act provides each LEA with exclusive control over its “expenditures, administration, personnel, and instructional methods”¹. PCSB conducts extensive fiscal oversight over each LEA. However, this oversight is not for the purposes of monitoring or controlling individual expenditures, but rather to ensure that each school has adequate finances for operation and to prevent fiscal mismanagement. PCSB also tracks school expenditures according to broad categories (such as personnel and facilities) to provide comparative information that allows other charter schools to benchmark their expenditures against their peers. PCSB does not oversee the expenditures of at-risk funds. Because at-risk funds are spent on a variety of items, such as personnel, supplies, and contracted services, reliable tracking of at-risk fund expenditures would require schools to engage in burdensome fund accounting.

In addition, PCSB is not responsible for the distribution of at-risk funds to LEA’s. This distribution is conducted by the Office of the Chief Financial Officer (OCFO) according to the audited enrollment provided by the Office of the State

¹ D.C. Code 38-1802.04(c)(3)(A)

Superintendent (OSSE). The information on the allocation to each school provided below was given to PCSB by the OCFO.

DC Public Charter Schools				
FY15 At Risk Funding Per School				
FY15 At Risk Student Enrollment	School Name	FY15 At Risk Funding	FY15 Additional At Risk Funding	Total At Risk Funding
1	319 ACHIEVEMENT PREP	\$ 663,201		\$ 663,201
2	262 APPLETREE	544,698	71,339	\$ 616,037
3	276 CAPITAL CITY	573,804		\$ 573,804
4	537 DC PREPARATORY	1,116,423		\$ 1,116,423
5	425 EXCEL ACADEMY	883,575		\$ 883,575
6	90 HOWARD UNIVERSITY	187,110		\$ 187,110
7	198 NATIONAL COLLEGIATE	411,642		\$ 411,642
8	259 POTOMAC	538,461		\$ 538,461
9	222 RICHARD WRIGHT	461,538		\$ 461,538
10	112 ST. COLLETA	232,848	257,639	\$ 490,487
11	0 ACADEMY OF HOPE	-		\$ -
12	69 BASIS	143,451		\$ 143,451
13	92 BRIDGES	191,268		\$ 191,268
14	16 BRIYA-ESF	33,264		\$ 33,264
15	0 CARLOS ROSARIO	-		\$ -
16	170 CEDAR TREE	353,430		\$ 353,430
17	668 CENTER CITY	1,388,772		\$ 1,388,772
18	737 CESAR CHAVEZ	1,532,223		\$ 1,532,223
19	688 COMMUNITY ACADEMY	1,430,352		\$ 1,430,352
20	0 COMMUNITYCOLLEGE PREP	-		\$ -
21	23 CREATIVE MINDS	47,817	132,936	\$ 180,753
22	148 DC BILINGUAL	307,692		\$ 307,692
23	44 DC INTERNATIONAL	91,476		\$ 91,476
24	272 DC SCHOLARS	565,488		\$ 565,488
25	291 DEMOCRACY PREP	604,989		\$ 604,989
26	403 E L HAYNES	837,837		\$ 837,837
27	462 EAGLE ACADEMY	960,498	102,218	\$ 1,062,716
28	155 EARLY CHILDHOOD	322,245		\$ 322,245
29	78 ELSIE WITHLOW STOKES	162,162	307,479	\$ 469,641
30	2318 FRIENDSHIP	4,819,122		\$ 4,819,122
31	67 HARMONY	139,293		\$ 139,293
32	315 HOPE COMMUNITY	654,885	323,930	\$ 978,815
33	121 IDEA - INTEGRATED DESIGN	251,559		\$ 251,559
34	131 IDEAL ACADEMY	273,349		\$ 273,349
35	142 INGENUITY	295,218	18,444	\$ 313,662
36	38 INSPIRED TEACHING	79,002		\$ 79,002
37	2270 KIPP ACADEMY	4,719,330		\$ 4,719,330
38	40 LATIN AMER YOUTH-LAMB	83,160	26,893	\$ 110,053
39	0 LAYC - YOUTH BUILD	-		\$ -
40	0 LAYC CAREER ACADEMY	-		\$ -
41	9 LEE MONTESSORI	18,711		\$ 18,711
42	222 MARY MCLEOD BETHUNE	461,538		\$ 461,538
43	0 MAYA ANGELOU	-		\$ -

44	260 MERIDIAN PC	540,540		\$ 540,540
45	64 MUNDO VERDE	133,056	185,073	\$ 318,129
46	0 NEXT STEP PCS	-		\$ -
47	208 OPTIONS PC	432,432		\$ 432,432
48	306 PAUL	636,174		\$ 636,174
49	445 PERRY STREET	925,155		\$ 925,155
50	44 ROOTS PC	91,476	36,937	\$ 128,413
51	161 SEED	334,719		\$ 334,719
52	45 SELA	93,555		\$ 93,555
53	12 SHINING STARS	24,948		\$ 24,948
54	165 SOMERSET	343,035		\$ 343,035
55	186 THURGOOD MARSHALL	386,694		\$ 386,694
56	184 TREE OF LIFE	382,536		\$ 382,536
57	117 TWO RIVERS	243,243		\$ 243,243
58	61 WASHINGTON LATIN	126,819		\$ 126,819
59	171 WASHINGTON MATH	355,509		\$ 355,509
60	30 WASHINGTON YU YIN	62,370	203,247	\$ 265,617
61	191 WILLIAM DOAR	397,089		\$ 397,089
15,339		\$ 31,890,781	\$ 1,666,135	\$ 33,556,916

Based on the self-reported information we collected through the surveys, LEA's spent the at-risk allocations in widely various ways. Below you can find a table summarizing their use. We have also provided the full list of responses in Appendix A. Many schools used their at-risk funds for multiple purposes, but the vast majority of these funds were used for various enrichment activities, including before- and after-school activities, academic interventions, social workers and behavioral specialists and summer school programming.

Category	Number of Schools	Percentage
Enrichment Activities (including Before and After School)	12	44%
Academic Interventions	10	37%
Social Workers/Behavior Specialists	10	37%
Summer School	8	30%
School Supplies/Uniforms for At-Risk Students	4	19%
Additional Teacher	2	7%
Dedicated Staff member for At-Risk and Low-performing students	2	7%
Extended Day/School Year	2	7%
Language Immersion Program	1	4%
Nutrition Programs	1	4%
SAT Workshops	1	4%

PCSB's survey also asked LEA's questions about their summer school programming, since the at-risk funds replaced a specific per-pupil allocation for summer school. This change has been cause for concern among some policymakers and community members. 18 of the 27 LEA's that responded to the survey provided summer school programming in the summer of 2015. Of the 18 schools that did provide summer school program in 2015, 14 provided the program free of charge, while two used a sliding scale for tuition, one charged a \$40 registration fee, and one school offered free to some grades, but charged a fee to others. This school, Eagle Academy PCS, attributed their need to charge a fee to the change from summer school funding to at-risk funding. Another school continued to offer summer school programming, but had to offer a shorter program for the same reason.

Of the nine schools that did not provide summer school programming, four were new schools opening in SY 15-16, another was under renovations that prevented the school from providing such programming, and another, KIPP DC, moved from having a dedicated summer school program to an extended school year model.

In their responses a few schools also offered critiques of the at-risk funding program. Two schools expressed concern about the elimination of per-pupil funding for summer school. Another LEA believed that the eligibility requirements for the at-risk funding were not comprehensive, and should include WIC eligibility. Finally, St. Coletta PCS, which serves primarily Level 3 and 4 students with special needs reported that their funding was actually reduced with the shift to at-risk funding.

I hope you find this information helpful. For additional questions about this report, please contact PCSB Communications Director, Tomeika Bowden, at tbowden@dcpcsb.org.

Sincerely yours,

Scott Pearson
Executive Director

Survey Responses: How DC Public Charter Schools Spent At-Risk Funds

Name:	Position:	LEA Name:	Please include a description of how your LEA has spent or plans to spend per pupil at-risk funds for SY15-16, particularly any programs, initiatives or enrichment activities the at-risk funds have supported or will support.	Did your school offer summer school programming in 2015?	If your school did offer summer school programming in 2015, was there a cost to families for the program?	If your school did not offer free summer school programming in 2015, was this a change from previous years?
Tony Taylor	District Ops. and Compliance Manager	AppleTree PCS	Our at-risk funds was allocated to the summer school program.	Yes	AppleTree has always charged a field-trip fee - using a sliding scale based on income - to all families. The maximum field-trip is designed to cover the additional cost of transporting students from the LEA to the field-trip location, and the maximum fee does not exceed \$100. This fee is often waived for many of our families.	NA
Martha Cutts	Head of School	Washington Latin PCS	We are hiring an additional staff member whose sole job it will be to "ride herd" on low-performing students.	Yes	No	Our summer school has always been free.
Allan Arbogast	Chief Operating Officer	The Children's Guild	Funds to support at-risk students will be used in three domains: student support through the use of clinicians and social workers, academic interventions, and enrichment activities through an extra period in the day.	No	We did not offer summer school.	We actually don't start as a new charter until September 2015.
Cristine Doran	Director of Finance and Facilities	Center City PCS	Center City PCS will continue to use at-risk funding to support intervention work, improving/strengthening the quality of instruction in our schools, and out of school time programming as funds allow.	Yes	Center City PCS did not charge fees for academic programming associated with the 2015 summer program.	N/A - Center City PCS has historically offered free summer programming/no changes to the fee

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Mayra Martinez-Fernandez	Deputy COO	Eagle Academy Public Charter School	<p>At Eagle Academy PCS we have found that a large percentage of our students are at-risk of academic failure given the number of strong predictors present in the population we serve. Our definition of at-risk includes students who are homeless, in the District's foster care system, and qualify for TANF or SNAP. It also includes six sets of variables: (1) basic demographic characteristics; (2) family and personal background characteristics; (3) the amount of parental involvement in student's education; (4) the student's academic history; (5) student behavioral factors; and (6) the intensity of identified disabilities.</p> <p>Given the large percentage of students at-risk of academic failure that we serve, every year Eagle Academy must put in place a comprehensive support system that includes interventionists, reading specialists, special education staff, speech therapists, occupational/physical therapists, psychologists, play therapist, counselors, social workers, and nurses, among others. It also requires additional supplemental, targeted materials and curricula, as well as intentional equipment and manipulatives.</p> <p>The fact that the cost for summer school was assumed in the funding generated by the at-risk weight (thus eliminating the UPSFF weight for summer school) forced Eagle Academy to reduce the size and scope of its summer program this year. All students, but particularly those who are at-risk of academic failure, were impacted by these reductions in services. Eagle Academy fully supports the at-risk funding and strongly encourages the DC Council to re-instate the UPSFF weight for</p>	Yes	<p>The fact that the cost for summer school was assumed in the funding generated by the at-risk weight (thus eliminating the UPSFF weight for summer school) forced Eagle Academy to reduce the size and scope of its summer program this year. All students, but particularly those who are at-risk of academic failure, were impacted by these reductions in services. Eagle Academy fully supports the at-risk funding and strongly encourages the DC Council to re-instate the UPSFF weight for summer school.</p> <p>We were able to offer free summer school to incoming third graders at the Congress Heights campus, and to incoming second and third graders at the Capitol Riverfront campus. All others were asked to pay \$500.00 for the 5 weeks.</p>	Not Applicable
David Schlossman	COO	Thurgood Marshall Academy	<p>Thurgood Marshall Academy provides a variety of programs that support at-risk students not found in many high schools; these are funded in part by DC at-risk funding. Examples include summer school, after-school programs coordinated by school employees to integrate them with the school day, remediation courses, and intensive college-and-career activities ranging from law-related workshops to SAT prep courses.</p>	Yes	<p>Thurgood Marshall Academy did not charge tuition or fees for summer school.</p>	<p>While Thurgood Marshall Academy offered summer school, funding changes prompted a reduction of course offering 19% reduction in course offerings (13 down from</p>

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Elizabeth Torres	Director	Washington Global PCS	<p>Washington Global PCS will use its at-risk funds to provide the following services to its students:</p> <ul style="list-style-type: none"> - Intervention programs in the areas of mathematics and reading; - Social work services provided by an on-site social worker; - School supplies (materials) for at-risk youth; -Transportation (metro) for at risk-youth when needed; -Socio-emotional curriculum; 	No	We were not open in the Summer of 2015. Thanks!	Yes, we will offer free summer school programming in SY 2015-2016 (summer of 2016) for students. We are a new LEA, so we did not have the opportunity to offer summer school in 2015.
Katie Pittman	Director of Accountability	KIPP DC	<p>KIPP DC provides strong academic and social support to at-risk students. At-risk funding may go to support the following programs:</p> <ul style="list-style-type: none"> - Extended school day - Extended school year (school begins August 10th in 2015 in all schools except KIPP College Preparatory which operates under a different schedule) - Dedicate social worker for each school - Extracurricular opportunities focused on academic and social development 	No	No payment required.	Yes. In past years, KIPP DC offered summer school during July. This year, we moved to an extended school year calendar with a summer session in the month of August with a short term break (less than a week) before beginning the fall semester. The program
Ryan Aurori	Director of Finance and Real Estate	D.C. Preparatory Academy	<p>Approximately 45% of DC Prep's student-body is considered "at-risk." Our academic model, with its rigorous academic academics and character education, is designed to meet the needs of these students. With the increased funding for at-risk students, DC Prep added teaching staff positions and supplemental resources to provide better-targeted 1:1 interactions between students and staff. One aspect of DC Prep's academic model is to provide intervention resources to students in a small group setting; additional staff allows for smaller groups and targeted intervention. The at-risk funding was also used to fund DC Prep's summer school program for students in need of increased academic support and targeted</p>	Yes	There was no cost to families for the program.	N/A

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Don Parker	SEC	Somerset Prep DC	<p>At Somerset our Community Liaison served as the primary service provider for our at risk population. We made a conscience effort to support those families in need with both traditional and non-traditional school community needs such as, purchasing school supplies for our displaced families that included book bags, notebooks, pencils, paper and organizers. We provided families with needed winter coats for attending and non-attending siblings, we provided transportation as needed for school and or critical community based resource needs.</p> <p>As a servant of this community we are especially proud of being able to appropriate monetary and human resources for the purpose of hosting 2 full community day activities. This effort provided staff and faculty with an opportunity to bridge the</p>	Yes	The Summer Bridge program was offered to attending students at no cost to parents.	There was no change to the programming from year to year.

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Cara Sklar		Briya PCS	<p>Due to the limited way at-risk is defined now, we received less money this year than in the past. While 100% of our PK students are ELL and 100% are eligible for FARM, less than half (45%) of our students were determined to be "at-risk".</p> <p>Those families who are the most vulnerable and unable to enroll in TANF or SNAP are not supported by "at-risk" dollars at school. This is counter to the intention of the at-risk funding to provide additional services to disconnected families.</p> <p>A potential solution is to include those families eligible for WIC in the list of criteria. WIC is much more widely used than SNAP or TANF by our families. Many of our families decline to apply for TANF or SNAP, despite being eligible, because they are working toward citizenship. Often, families believe enrolling in these programs can impact their likelihood of attaining citizenship.</p> <p>WIC eligibility aligns with eligibility for SNAP and TANF and is a good way to reach students at risk of academic failure who are in need of additional supports. Below, please see the comparison of program income eligibility guidelines:</p> <p>Free/Reduced Lunch: 130-185% of Federal Poverty Level (FPL) SNAP: 130-200% of FPL TANF: children ages 1-5 133% of FPL WIC: 185% of FPL</p>	Yes	no cost to families summer school was shorter this summer due to decrease in funding	n/a
Zuella Evans	Business Manager	IDEAL ACADEMY PCS	The funds will be used to support a Foreign Language Immersion Program, social worker, afterschool program, and reading/math resource teachers.	Yes	No cost to families to attend our summer school program.	N/A

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Melissa Winters	Registrar	Democracy Prep Congress Heights	Extended school day Academic Collaboration Team (ACT) Saturday School - additional tutoring Summer School Uniform assistance School Supply Assistance Bus/metro tokens	Yes	Families did not pay for summer school.	We were not in existence.
Tiffany Johnson	Chief of Staff	DC Scholars Public Charter School	We have hired an RTI Behavioral Coach to support student behaviors and to increase support to at-risk students.	No	N/A	Yes. Our school was under renovations, which is the only reason we did not offer a program this year. We did refer our students to other summer programs and pay the registration fee for those programs for a certain number of targeted students who could benefit from
Wendy Edwards	Executive Director	Early Childhood Academy Public Charter School	ECA offered a six-week summer school program for students in grades pk3 through grade 3 as an extension of grade level learning, and specifically to reinforce	Yes	No, the ECA summer school program, from 9 am to 1:00 pm, was free for all ECA students.	ECA offered free summer school for all students during the summers of 2013, 2014,

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Emin Cavusoglu	Principal	Harmony DC PCS	<p>Harmony DC PCS plans to allocate per pupil at-risk funds for SY15-16 for its after-school programs and Saturday schools. Those programs are essential for students' success. Identified low achieving/struggling students are required to receive additional tutorials in small group in all grade levels. The main goal of the program is the academic improvement that yields positive outcomes in reducing dropout rates. Tutoring is offered to students after school and on Saturdays.</p> <p>Additionally, Harmony DC PCS has been partnered with Reading Partners to provide weekly one-on-one literacy tutoring to at-risk students using its research-based curriculum, a series of structured lesson plans that progress from phonics instructions for younger students to higher order comprehension strategies for older students. Some parts of per pupil at-risk funds for SY15-16 has been allocated to fund</p>	No	N/A.	N/A.
Marlene Magrino	Principal	Monument Academy	Behavioral support staff, space build-out to provide less distractions and smaller group instruction, mentor/mentee, Positive Action (research-based social-emotional curriculum), Trauma Systems Therapy training for staff and weekly team meetings through partnership with NYU, partnership with Georgetown Adolescent Psychiatry	No	N/A - We just opened.	N/A - We just opened.
Geovanna Izurieta	Director of Finance	Washington Latin Public Charter School	Our LEA invested these funds in a six week summer school program that served 207 students, 31% of students at Washington Latin Public Charter School at no cost. The summer program offered seventeen courses, from which ten were credit-bearing. The courses ranged from English and Math for all levels, History, Government and health as well as Creative Writing, Computer Programming, SAT Prep and	Yes	No cost to families.	N/A
Eric Stultz		National Collegiate Prep PCHS	The majority of the at-risk funding for our school contributes to our student support staff and programs.	Yes	No	N/A
Denise Lyons	Dir. Business & Compliance	DC International School	DC International School offers afterschool clubs and activities at a greatly reduced rate for families who qualify as at risk. DCI uses this funding the support the continuation of this program.	No	n/a	Last year was our first year opening, so there was no previous years to change from.

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Regina Rodriguez	Executive Director	Shining Stars Montessori Academy	At SSMA any and all funds determined to have been allocated as at risk are directed specifically to support those children requiring additional resources to fully participate in school activities (i.e., field trips, after care and or extended learning scholarship supports, etc)..	No	N/A	No
Chris Pencikowski	Head of School	Lee Montessori PCS	Key activities include: *- Hiring a Family Coordinator whose main responsibility is to work with at-risk families to ensure coordination of in- and out-of-school services, improve attendance, and provide in-school supports for children. *- Structuring before/after care services so that at-risk children can attend for free. *- Providing counseling services for at-risk children and families	Yes	Summer programs were provided by an outside group at our school.	Not applicable. 2014-15 was our first year of operations.
Will Steotzer	Co-Founder & Managing Director of Business and	Ingenuity Prep	Given that our At-Risk percentage is very high (74%) our At-Risk funds generally went to support schoolwide programming. This school year, we were able to bring a full-time school psychologist and speech-language pathologist as a result of	No	We did not offer summer school programming in 2015 due to construction on our facility.	No, though we are looking at doing summer school programming in 2016.

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Charles Hutchison	Head of Operations	BASIS DC	<p>BASIS DC offers a number of before and after school programs designed to provide educationally valuable and engaging opportunities for all BASIS DC students. The school building is open from 7:00 AM to 6:00 PM offering the following programs:</p> <p>Early Bird - Before school supervised space for students to complete homework and socialize.</p> <p>Late Bird - After school supervised space for students to complete homework, socialize, participate in structured activities, and seek help with homework. As an after care program, Late Bird comes at a cost to parents, but students qualifying for free and reduced meals, or who are on our Direct Certification list, automatically qualify for free Late Bird participation.</p> <p>Student Hours - Students are able to meet with their at least one of their teachers every day after school. These hours enable students to seek additional academic support, and ask questions they would not be able to during a class period.</p> <p>Extra-Curricular Programs - BASIS DC offers year round extra curricular programming for all students. Some of these clubs and activities cost money to families, but students qualifying for free or reduced meals or who are on our direct certification list are able to participate free of charge,</p> <p>In edition to our before and after school programs, BASIS DC offers students a comprehensive academic support program aimed to identify students who may be struggling academically and providing them with additional support to get them on level. This program pair struggling students with staff members, who</p>	Yes	BASIS DC offered a summer program from July 13, 2015 - August 13, 2015. This program was at cost to families, but students who qualified for free and reduced meals during the school year, or who were on our direct certification list, or who met the income guidelines for free or reduced meals.	BASIS DC offered summer programming for SY13, SY14, SH15. Each year, programs were available for free for students who qualified.

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Deborah Lockhart	CEO	Excel Academy Public Charter School	Excel Academy receives NCLB funding to ensure that all children have a fair, equal, and significant opportunity to obtain a highly-quality education and reach, at a minimum, proficiency on challenging State academic achievement standards and state academic assessments. Excel will continue to focus its strategies on improving Math, particularly with our Special Education as the subgroup most in need of targeted	Yes	There was only a minimal \$40 registration fee for the five-week summer school program in which families were responsible for paying at the time of registration. There was no cost for the actual program.	Our school did offer free summer school programming. Question Not Applicable.
Khafi McDowell	Business Manager	Hope Community Charter School	Hope Community Charter has a robust program that addresses many of the needs of our at-risk population. We offer academic supports and interventions through group and one-on-one settings depending on the needs of the student. In addition, we offer uniforms, school trip, schools supplies and any other financial assistance to students with needs recognizing that many of these items are important to student success. In acknowledgment that the meals that students have at school maybe their best and only meal of the day, we ensure that each student has a healthy, nutritious and delicious meal during the course of their day through our School Breakfast and Lunch Program. We also have a host of after school activities which allow the student to hone in on other interest and hobbies that assist in making them a better-rounded individual in addition to creating avenues for constructive activity during their unoccupied times of the day. We offer different types of art, science and sports activities through this program. Hope Community Charter also offers a half day six week summer	Yes	Our schools offer a free half day summer school program for our students. To supplement the day one of our campuses offered a half day paid summer camp summer program also. The program was \$450 per child for a four week program.	N/A

Survey Responses: How DC Public Charter Schools Spent At-Risk Funds

Name:	Position:	LEA Name:	Please include a description of how your LEA has spent or plans to spend per pupil at-risk funds for SY15-16, particularly any programs, initiatives or enrichment activities the at-risk funds have supported or will support.	Did your school offer summer school programming in 2015?	If your school did offer summer school programming in 2015, was there a cost to families for the program?	If your school did not offer free summer school programming in 2015, was this a change from previous years?
K Rowland	CFO	St Coletta Special Education Public Charter School, Inc.	Our school serves students with intellectual and multiple disabilities who are at risk of losing skills attained during the school year with a traditional summer break. Instead, our school offers an ESY providing programming through the months of June and July. We used to be funded from the "summer school" element of the formula, which was eliminated to create the "at risk" element. Unfortunately, the definition of "at risk" students does not include students with significant disabilities. Therefore, we now receive LESS funding than previously for our services. All "at risk" funding is used to support our students during summer programming.	Yes	no	Our "summer program" is actually part of our ESY as determined on the student IEP and designed to help our population retain skills they have attained during the school year. We have always offered this programming, but have lost funding for it as a result of the changes in the categories/elements of the per student formula (the addition of an "at risk" category).