



# **2013-14 Charter Renewal Report**

## **Booker T. Washington Public Charter School for the Technical Arts**

**December 11, 2013**

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## FINDINGS AND RECOMMENDATION

After reviewing the renewal application<sup>1</sup> submitted by the Booker T. Washington Public Charter School for the Technical Arts (“Booker T. Washington PCS,” or “BTWPCS”), as well as the school’s record established by the District of Columbia Public Charter School Board (“PCSB”), PCSB staff concurs with the decision of the school’s Board of Trustees that its high school should be closed at the end of school year 2013-14 – it has not met its goals and expectations and is ineligible for renewal.

PCSB has determined that the school’s adult program has also not met its goals and student academic achievement expectations, and as such does not meet the standard for charter renewal set out in the District of Columbia School Reform Act of 1995 (the “School Reform Act” or the “SRA”).<sup>2</sup> Additionally, as described in detail in the report, the school may not be economically viable.

Based on the above determination, PCSB staff recommends that BTWPCS’ renewal application be denied, that the school’s charter not be renewed, and the school close at the end of the 2013-14 school year.

## INTRODUCTION

### School Overview

Booker T. Washington PCS began operation in 1999 as a high school under authorization from the District of Columbia Board of Education (“DC BOE”). It currently offers two programs: a traditional high school program, resulting in a high school diploma, and an adult education program, with several different trade and academic programs. In 2007, after the passage of the Public Education Reform Amendment Act dissolved the DC BOE, PCSB became the authorizer of Booker T. Washington PCS. Booker T. Washington PCS’ demographics and overall performance data are summarized in the table below.

Campus	Ward	Year Opened	Grades Served	2013-14 Enrollment <sup>3</sup>	2010-11 PMF	2011-12 PMF	2012-13 PMF
BTWPCS	1	1999	9-12	180	36.1% <b>Tier 2</b>	30.0% <b>Tier 3</b>	22.9% <b>Tier 3</b>
			GED/ Adult	370	Met 7 of 9 targets	Met 7 of 8 targets	Met 7 of 7 targets

<sup>1</sup> See Booker T. Washington PCS Renewal Application, attached to this report as Appendix A.

<sup>2</sup> “[...]{T}he eligible chartering authority shall not approve such [renewal] application if the eligible chartering authority determines that...[t]he school failed to meet the goals and student academic achievement expectations set forth in its charter.” SRA §38-1802.12.(c)(2). Sections 1 and 2 of this report serve as the analytical support for this recommendation.

<sup>3</sup> Unaudited OSSE student enrollment figures dated October 2013.

## **Previous Charter Reviews**

### **First Charter Review**

During the 2005-06 school year, the DC BOE conducted a five-year charter review, finding that although the school advertised 13 trades it only offered courses in three. The school was granted conditional continuance, based on, among other things, that the school had not been accredited by its fifth year in operation.

### **Second Charter Review**

In 2011-12, the BTWPCS' thirteenth year in operation, PCSB, while recommending charter continuance, found the school to be in the "developmental stages" in aligning their academic trade courses with relevant standards, with its instructional program described as "remain[ing] an area of need." Additionally, it was noted that the school had committed "violations relating to the education of children with disabilities," including that several special education students were not being serviced according to their Individualized Education Plan due to insufficient staffing.

### **2013-14 Renewal Process**

On June 30, 2014 BTWPCS' charter will expire, and on October 21, 2013 the school's board of trustees submitted to PCSB an application to renew the school's charter for a second fifteen-year term. The standard for charter renewal, as established by the SRA, is that "PCSB shall approve a school's renewal application, except that PCSB shall not approve the application if it determines one or both of the following:

- (1) The school committed a material violation of applicable laws or a material violation of the conditions, terms, standards, or procedures set forth in its charter, including violations relating to the education of children with disabilities; or
- (2) The school failed to meet the goals and student academic achievement expectations set forth in its charter."<sup>4</sup>

Separate and apart from the renewal process, PCSB is required by the SRA to revoke a school's charter if PCSB determines that the school (1) has engaged in a pattern of nonadherence to generally accepted accounting principles; (2) has engaged in a pattern of fiscal mismanagement; and/or (3) is no longer economically viable.<sup>5</sup>

Given the SRA's standard for charter renewal, as well as PCSB's obligation to revoke a school's charter if it has engaged in the above types of fiscal misconduct, this report is organized into three sections. Sections One and Two are analyses of the school's academic performance and legal compliance, respectively, and serve as the basis for PCSB staff's renewal recommendation. Section Three is an

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<sup>4</sup> SRA §38-1802.12(c).

<sup>5</sup> SRA § 38-1802.13(b).

analysis of the school's fiscal performance – included so that in the case that a school is found to have met the standard for charter renewal but has also engaged in fiscal mismanagement, PCSB staff can advise the PCSB Board accordingly.

#### PCSB staff renewal analysis and recommendation

PCSB staff has determined that Booker T. Washington PCS –both its adult and high school program – has not met its goals and academic expectations, and as such does not meet the SRA's standard for charter renewal.<sup>6</sup>

A fact that weighs heavily against the school's adult program meeting its goals and expectations relates to its evening trade program. The school falsely claimed in its renewal application that in 2007-08 it was "certified as a National Construction and Carpentry Education Research Center by the National Center for Construction Education and Research ("NCCER")," and that NCCER "authorized" the school to issue certificates in five trade areas. However, NCCER records, submitted by the school, indicate that Booker T. Washington PCS was, for the first time, approved for a three-year accreditation period on December 10, 2013.<sup>7</sup> In addition to this, the data that the school supplied to PCSB for enrollment, trade certification, and attendance is riddled with conflicting and missing information.

Apart from the renewal standard, the school appears to have not adhered to the SRA's requirements regarding procurement contracts with a value of \$25,000 or higher: the school only submitted information about one such contract from 2009-10 to present. Additionally, the school may not be economically viable.

Based on these determinations, PCSB staff recommends that Booker T. Washington PCS' renewal application be denied, that the school's charter not be renewed, and the school close at the end of the 2013-14 school year.

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<sup>6</sup> SRA §38-1802.13(b).

<sup>7</sup> See December 2013 NCCER accreditation letter, attached to this report as Appendix B.

## **SECTION ONE: GOALS AND ACADEMIC ACHIEVEMENT EXPECTATIONS**

The SRA provides that PCSB shall not approve a charter renewal application if the school has failed to meet its goals and student academic achievement expectations (“academic expectations”) in its charter agreement.<sup>8</sup> Goals are general aims (usually related to a school’s mission), which may be categorized as academic, non-academic, and organizational, whereas academic expectations are student academic aims measured by assessments.

In its renewal assessment, PCSB only analyzes goals and academic expectations that were included in a school’s charter, charter amendment, or 1999-2008 accountability plans that were originally included in a school’s charter application and periodically updated and approved by the PCSB Board (collectively, the “Charter”). For goals and expectations that were not consistently pursued over the course of the school’s Charter, or were not historically measured by the school, it is noted in this report that they were “not historically measured.”

Given the decision of Booker T. Washington PCS’ Board of Trustees to close the school’s high school program at the end of school year 2013-14, the following section separately analyzes whether the school’s high school and adult education programs have met the school’s goals.

PCSB has determined that, of the eight goals and academic expectations consistently pursued by the school and measured by PCSB, that Booker T. Washington PCS’ adult program has not met four of these eight goals, and its high school program has not met five of these eight goals. The table on the following page summarizes these determinations, which are detailed in the body of this report.

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<sup>8</sup> SRA §38-1802.12(c)(2).

	<b>Goal or Expectation</b>	<b>Adult Program Met?</b>	<b>High School Met?</b>
1	Develop student's ability to work as a team member on a construction crew in a building trade skill area.		
2	Develop a knowledge of building trade skills and practices through an understanding of the "real world" conditions of the job	No	No
3	Acquire skill certification in a particular construction trade.	No	No
4	Learn appropriate life skills and the responsibilities of citizenship.	Yes	Partially Met
5	Students will demonstrate high academic skills.	Yes	No
6	The school will maintain stable student enrollment.	No	No
7	To establish relationships with community stakeholders such as, but not limited to, unions, contractors, or government placement agencies.	Yes	Yes
8	The school will maintain a stable and qualified faculty.	Yes	Yes
9	Students will pursue post-secondary educational opportunities.	No	No

1. Booker T. Washington PCS has two goals that are assessed using the same set of data. Therefore, PCSB and the school agreed to make one determination.

**Goal A: Develop student’s ability to work as a team member on a construction crew in a building trade skill area.**

**Goal B: Develop a knowledge of building trade skills and practices through an understanding of the “real world” conditions of the job.**

Assessment: **BTWPCS’ adult program has not met these goals.** While BTWPCS conducts trade classes in several areas, its students do not achieve industry-recognized certification. While BTWPCS provides school-issued certificates, it did not provide written standards for students earning these certificates.

**BTWPCS’ high school program has not met this goal.** BTWPCS did not provide documentation regarding its high school students’ development in construction trades, and PCSB did not find its high school students learning about trades during its Qualitative Site Review visits.

### **Adult Evening Program**

BTWPCS offers three separate evening adult education programs: (a) trade education, which provides technical instruction in preparation for various careers; (b) the evening high school diploma program, through which students may earn a traditional high school diploma; and (c) the General Educational Development (“GED”) program, through which students prepare for the GED exam. The performance of the trade education program is discussed below; the evening high school and GED programs are discussed in further detail later on in this report (see Goal 5).

BTWPCS offers career preparation programming in several areas: (a) stationary steam engineering; (b) electrical wiring; (c) plumbing; (d) core curriculum; (e) heating, ventilation, and air conditioning; and (f) flagging. Additionally, the school contracts with outside providers to offer one-day OSHA-10 and CPR classes through which students can earn a school-issued certificate. While the school states in its renewal application that five of these programs are certified by the National Construction and Carpentry Education Research Center (“NCCER”), NCCER has confirmed that BTWPCS was not authorized to award NCCER certificates as they just received their accreditation letter on December 10, 2013.<sup>9</sup>

The fact that the school was not NCCER-certified, but claims it has had this certification since 2008 –on its website, on school-issued certificates, and in its renewal documentation submitted to PCSB – puts into question the authenticity of its program and its previous performance on accountability plans. Additionally, the school was unable to produce records regarding its trade program supporting the claims made in its renewal application.

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<sup>9</sup> See NCCER, Find a Center, <http://www.nccer.org/Center-Search.aspx>.



The school has set and met targets regarding students earning its school-issued certificates. Note that these school-issued certificates are not affiliated with an external accrediting agency (except for the one-day OSHA-10 and CPR certificates) and as such are not considered industry-recognized. Additionally, target attainment was largely based on adult students earning one-day OSHA-10 and CPR certificates. While PCSB staff confirmed the school’s attainment of its Accountability Plan targets in 2011-12 and 2012-13, the school was unable to produce the data now, in its renewal application, that would support having met these targets.

Booker T. Washington PCS: Evening Adult Trade Certificate Targets		
Year	Target	Target Met?
2011-12	80% of Career Preparation Training Students will be awarded at least 2 certificates: OSHA-10 licensure hours; CPR Certificate; Flagger Certificate, HVAC Certificate, Plumbing Certificate.	<b>Met</b> 87% (55 of 63 students) of Career Preparation Training students were awarded 2 certificates or more.
2012-13	80% of Career Preparation Training Students will be awarded at least 2 certificates: OSHA-10 licensure hours; CPR Certificate; Flagger Certificate, HVAC Certificate, Plumbing Certificate.	<b>Met</b> 90.4% (75 of 83 students) of Career Preparation Training students were awarded 2 certificates or more.

Stationary Steam Engineering<sup>10</sup>

BTWPCS offers a stationary steam engineering (“SSE”) program to its adult students, reporting that it holds three-hour SSE classes twice a week.<sup>11</sup> The BTWPCS SSE program does not have a fixed duration; instead, a student attends SSE classes until their instructor “certifies that the student has successfully completed the course” and recommends the student take the state licensure exam. In its renewal application the school describes the SSE program as being certified by NCCER, and issues SSE certificates with the NCCER logo on it to students. However, PCSB determined that neither was BTWPCS’ SSE program accredited by NCCER, nor did the school produce written standards aligned with NCCER’s SSE certification standards. In an on-site review conducted as part of the renewal process, PCSB found documentation supporting the following SSE enrollment and course completion, which showed that, in one year, more students received school-issued certificates than were enrolled in the course whereas in other years roughly 50% of the enrollees received certificates.

<sup>10</sup> In general, stationary steam engineers operate heavy machinery and equipment (including boilers and turbines, among others) that provide heat, light, and power.

<sup>11</sup> See Booker T. Washington PCS 2012-13 Annual Report, p. 13, attached to this report as Appendix C.

BTWPCS: Evening Adult Stationary Steam Engineering Outcomes			
Year	Students Enrolled <sup>12</sup>	School-Awarded Certificates	Completion Rate
2009-10	16	No records	-
2010-11	35	18	51.4%
2011-12	40	42	Undefined
2012-13	59	27	45.8%
2013-14	60 <sup>13</sup>	In progress	-

### Electrical Wiring Program

BTWPCS offers an electrical program to its adult students, reporting it holds a three-hour electrical classes twice a week.<sup>14</sup> The BTWPCS electrical wiring program does not have a fixed duration; nor did it produce written standards for course completion. BTWPCS describes its electrical wiring program as not being sufficient to prepare students for state licensure, and recommends that students take additional coursework elsewhere before sitting for the state exam.

The school did not describe student outcomes in electrical wiring in its renewal application, and did not produce any documentation supporting that any student completing its electrical wiring course has earned state licensure in the field. In an on-site review, PCSB found documentation supporting the following electrical wiring enrollment and course completion.

BTWPCS: Evening Adult Electrical Program Outcomes			
Year	Students Enrolled <sup>15</sup>	School-Awarded Certificates	Completion Rate
2009-10	10	No records	-
2010-11	8	0	0.0%
2011-12	10	No records	-
2012-13	44	9	20.5%
2013-14	47 <sup>16</sup>	In progress	-

### Plumbing

BTWPCS offers a plumbing program of no fixed duration to its adult students, although its unclear when and how often the school holds plumbing classes.<sup>17</sup> In its renewal application the school describes

<sup>12</sup> In the 2009-10, 2010-11, and 2011-12 school years, evening enrollment numbers were reported by the school in its annual reports. In 2012-13 and 2013-14, enrollment numbers by course were estimated by PCSB.

<sup>13</sup> Booker T. Washington PCS provided a written summary of enrollment that has not been validated by PCSB.

<sup>14</sup> See Appendix C, p. 13. However, the school's documentation for the 2013-14 school year indicates that this class is held once per week.

<sup>15</sup> In the 2009-10, 2010-11, and 2011-12 school years, evening enrollment numbers were reported by the school in its annual reports. In 2012-13 and 2013-14, enrollment numbers by course were estimated by PCSB.

<sup>16</sup> Booker T. Washington PCS provided a written summary of enrollment that has not been validated by PCSB.

the plumbing program as being certified by NCCER, and issues plumbing certificates with the NCCER logo on it to students. However, PCSB staff determined that BTWPCS’ plumbing program was not accredited by NCCER, nor did the school produce written standards aligned with NCCER’s plumbing certification standards. BTWPCS describes its plumbing program as not being sufficient to prepare students for state licensure, and recommends that students take additional coursework elsewhere before sitting for the state exam.

The school did not describe student outcomes in plumbing in its renewal application, and did not produce any documentation supporting that any student completing its plumbing course has earned state licensure in the field. In an on-site review, PCSB found documentation supporting the following plumbing enrollment and course completion, which, in every year, showed more students receiving certificates than having been enrolled in the course.

BTWPCS: Evening Adult Plumbing Program Outcomes			
Year	Students Enrolled	Certificates Awarded	Completion Rate
2009-10	No records	No records	-
2010-11	0	10	Undefined
2011-12	0	11	Undefined
2012-13	3	11	Undefined

### Core Curriculum

BTWPCS offers a “core curriculum” program, with no fixed duration, for its adult students, reporting it holds three-hour core curriculum classes twice a week.<sup>18</sup> “Core curriculum” is an industry term for prerequisite subjects (including safety and communication, among other subjects), necessary to pursue any construction trade.

In its renewal application the school describes the core curriculum program as being certified by NCCER, and issues core curriculum certificates with the NCCER logo on it to students. However, PCSB determined that BTWPCS’ core curriculum program was not accredited by NCCER, nor did the school produce written standards aligned with NCCER’s core curriculum certification standards.<sup>19</sup>

The school did not describe student outcomes in core curriculum in its renewal application. In an on-site review, PCSB found documentation supporting the following core curriculum enrollment and course completion. However, the quality of the data is questionable because more students received certificates than were included in the school’s enrollment records. There is also an unprecedented and unexplained 300% increase in the number of students enrolled in this program from 2012-13 to 2013-14.

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<sup>17</sup> See Appendix C, p. 13.

<sup>18</sup> See Appendix C, p. 13.

<sup>19</sup> See NCCER, Find a Center, <http://www.nccer.org/Center-Search.aspx>.

BTWPCS: Evening Adult Core Curriculum Outcomes			
	Students Enrolled <sup>20</sup>	School-Awarded Certificates	Completion Rate
2009-10	40	No records	-
2010-11	20	0	0.0%
2011-12	30	72	Undefined
2012-13	32	30	93.8%
2013-14	106 <sup>21</sup>	In progress	-

### HVAC Program

BTWPCS offers a heating, ventilation, and air conditioning (“HVAC”) program of no fixed duration to its adult students, holding three-hour classes twice a week.<sup>22</sup> In its renewal application the school describes the HVAC program as being certified by NCCER, and issues HVAC certificates with the NCCER logo on it to students. However, PCSB staff determined that BTWPCS’ HVAC program was not accredited by NCCER, nor did the school produce written standards aligned with NCCER’s HVAC certification standards.<sup>23</sup> BTWPCS described in a November 2013 meeting with PCSB that its HVAC program is not sufficient to prepare students for state licensure, and the school recommends that students take additional coursework elsewhere before sitting for the state exam.

The school did not describe student outcomes in HVAC in its renewal application, and did not produce any documentation supporting that any student completing its HVAC course has earned state licensure in the field. In an on-site review, PCSB found documentation supporting that of the 93 HVAC enrollees since 2009-10, only 13 students (14%) received a certificate. According to PCSB’s on-site review of its records, the school has no students enrolled in this program for the 2013-14 school year.

BTWPCS: Evening Adult HVAC Program Outcomes			
	Students Enrolled <sup>24</sup>	School-Awarded Certificates	Completion Rate
09-10	19	No records	-
10-11	25	No records	-
11-12	25	1	0.04%
12-13	24	12	50.0%
13-14	No records <sup>25</sup>	-	-

<sup>20</sup> In the 2009-10, 2010-11, and 2011-12 school years, evening enrollment numbers were reported by the school in its annual reports. In 2012-13 and 2013-14, enrollment numbers by course were estimated by PCSB.

<sup>21</sup> Booker T. Washington PCS provided a written summary of enrollment, but PCSB could not validate this based on submitted attendance records.

<sup>22</sup> See Appendix C, p. 13.

<sup>23</sup> See NCCER, Find a Center, <http://www.nccer.org/Center-Search.aspx>.

<sup>24</sup> In the 2009-10, 2010-11, and 2011-12 school years, evening enrollment numbers were reported by the school in its annual reports. In 2012-13 and 2013-14, enrollment numbers by course were estimated by PCSB.

<sup>25</sup> Booker T. Washington PCS provided a written summary of enrollment, but PCSB could not validate this based on submitted attendance records.

### Flagging

BTWPCS offers a one-day, 10.5-hour training in construction flagging led by an outside contractor. In its renewal application the school describes its flagging program as being certified by NCCER. However, PCSB staff determined that BTWPCS' HVAC program was not accredited by NCCER, nor did the school produce written standards aligned with NCCER's flagging certification standards.<sup>26</sup> Additionally, the school has no records of students enrolled in this training program. In 2010-11, BTWPCS reported 12 students as earning certificates for flagging, despite having no records of students enrolled for that year.

BTWPCS: Evening Adult Flagging Program Outcomes		
	Students Enrolled	School-Awarded Certificates
2009-10	No records	No records
2010-11	No records	12
2011-12	No records	No records
2012-13	No records	No records

### OSHA-10

The U.S. Department of Labor's Occupational Safety and Health Administration ("OSHA") created the "OSHA-10," a ten-hour training program designed for entry-level workers regarding safety and health hazards in workplaces, along with information about workers' rights and employer responsibilities. OSHA authorizes organizations to conduct this training.

BTWPCS offers an OSHA-10 training program led by an outside contractor. However, the school has no records of students enrolled in this training program. The school reported that 12 students and 3 students earned an OSHA-10 certificate in 2010-11 and 2011-12, respectively.

BTWPCS: Evening Adult OSHA-10 Program Outcomes		
	Enrolled Students	School-Awarded Certificates
2009-10	No records	No records
2010-11	No records	12
2011-12	No records	3
2012-13	No records	No records

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<sup>26</sup> See NCCER, Find a Center, <http://www.nccer.org/Center-Search.aspx>.

## CPR

BTWPCS offers a cardiopulmonary resuscitation (“CPR”) training program led by an outside contractor. However, the school has no records of students enrolled in this training program. The school reported that 12 students and 17 students earned a CPR certificate in 2010-11 and 2011-12, respectively.

BTWPCS: Evening Adult CPR Program Outcomes		
	Enrolled Students	School-Awarded Certificates
2009-10	No records	No records
2010-11	No records	12
2011-12	No records	17
2012-13	No records	No records

## **Adult Day Program**

Booker T. Washington PCS operates three separate daytime adult education programs: a Virtual Enterprise business skills program, which meets twice weekly on Mondays and Tuesdays; an Adult Basic Education / General Educational Development (“GED”) program, which meets twice weekly on Wednesday and Thursdays; and the National External Diploma Program, a self-study program where students schedule meetings with their instructors on an individual basis. The performance of the business skills program is discussed below; the GED and external diploma programs are discussed in further detail in a later section of this report (see Goal 5).

### Business skills certificates

As part of its adult day program, students can pursue several different computer and business certificates that are issued by the school and not accredited by an outside organization. The school has set targets regarding student attainment of these certificates since 2009-10.

BTWPCS: Daytime Adult Business Skill Targets <sup>27</sup>		
Year	Target	Target Met?
2010-11	80% of Virtual Enterprise Program students will be awarded at least 2 certificates for completion in any of the following components: Computer Literacy, Office Machines, Microsoft Word, Microsoft Excel, Data Entry, Keyboarding, or Entrepreneurship.	<b>Met</b> 80% of students were awarded at least two certificates
2011-12	80% of Virtual Enterprise Program	<b>Not Met</b>

<sup>27</sup> The source for the school’s 2009-10 target is Booker T. Washington PCS 2009-10 Annual Report, attached to this document as Appendix D. The targets from other years are sourced from the school’s adult accountability plans for school years 2010-11, 2011-12, and 2012-13. See Booker T. Washington PCS 2010-11 Adult Accountability Plan, attached to this report as Appendix E; Booker T. Washington PCS 2011-12 Adult Accountability Plan, attached to this report as Appendix F; Booker T. Washington PCS 2012-13 Adult Accountability Plan, attached to this report as Appendix G.

	students receive certificates for the completion of the following: Computer Literacy, Office Machines, MS Word, Excel, Data Entry, Keyboarding (40wpm), and/or Entrepreneurship.	62% (8 of 13 students) of Virtual Enterprise Program students were awarded at least two certificates.
2012-13	80% of Virtual Enterprise Program students receive certificates for the completion of the following: Computer Literacy, Office Machines, MS Word, Excel, Data Entry, Keyboarding (40wpm), and/or Entrepreneurship.	<b>Met</b> 100.0% (11 of 11 students) of Virtual Enterprise Program students were awarded at least two certificates.

To support its renewal application, BTWPCS produced documentation supporting the following numbers of earned computer and business certificates. The below data does not align to the school’s reported performance in its Accountability Plans, putting into question the validity of the data. Note that daytime Virtual Enterprise students may earn multiple certificates.

BTWPCS Daytime Adult Student Computer/Business Certificate Attainment							
	Computer literacy certificates	Office machines certificates	Microsoft Word certificates	Microsoft Excel certificates	Entrepreneurship certificates	Total certificates awarded	Total students enrolled
10-11	0	4	5	2	0	11	23
11-12	0	4	1	0	5	10 <sup>28</sup>	7
12-13	11	11	3	3	9	37	17

As part of BTWPCS’ Virtual Enterprise Program, students set up and run a simulated business. Each year, BTWPCS VEP students participate in the Annual Virtual Enterprises Trade Fair in New York City. Students participating in VEP have received the following awards since 2009-10:

- Honorable mention in the sales pitch competition during the VEP International Trade Fair (2010-11); and
- First Place and an award for outstanding performance from the Maryland Council on Economic Education in its 2011 stock market game; and<sup>29</sup>
- Best booth design and best sales pitch during VEP international Trade Fair (2012-13).<sup>30</sup>

<sup>28</sup> While Booker T. Washington PCS reported eight Virtual Enterprise students earning two or more certificates in its 2011-12 Accountability Plan, PCSB found documentation for only 10 certificates on its November 14, 2013 site visit. See Appendix G

<sup>29</sup> See Booker T. Washington PCS Annual Report 2010-11, p. 58, attached to this report as Appendix H.

## **High School Program**

While in its renewal application BTWPCS describes its high school program as a “blended or combined academic and vocation school,” it did not provide information or documentation regarding how its high school students developed knowledge in trade practices.

### **Qualitative Evidence**

In February 2013, PCSB conducted a Qualitative Site Review (“QSR”) of Booker T. Washington PCS, in which the following was observed.

Members of the review team observed instruction in three out of the day program’s school’s four trade class offerings: plumbing, computer-aided drafting (CAD), and carpentry. The reviewers noted that students participated in practical applications of skills, including taking apart and putting together a faucet in order to learn how to fix simple leaks, as well as construction projects in the carpentry class.<sup>31</sup>

In September 2013, PCSB conducted an additional QSR, in which the following was observed.

In core subject areas, teachers, on the whole, did not connect the content with the construction trades, or other career opportunities. PCSB did not observe consistent development of construction skills through hands on activities in the trade classes, as instruction in these classes consisted mainly of a review of trade terminology....

PCSB had the opportunity to observe various construction and building trade classes, though PCSB observed that few students were present in the upper level trade classes. One such class had one student enrolled, and because the student was absent on the day of the observation, the class did not take place. In other trade classes, students read directly from trade textbooks to learn trade definitions. In one class, students hammered nails into a wooden block and learned safety tips. In another class, seven students were present and were never fully engaged in instructional activities. The students told the teacher that they had already completed the instructional task that the teacher handed out.

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<sup>30</sup> See Appendix C, p. 41.

<sup>31</sup> See Qualitative Site Review Report, Booker T. Washington PCS, dated March 14 2013, attached to this report as Appendix I.



## 2. Acquire skill certification in a particular construction trade.

Assessment: **BTWPCS’ adult and high school programs have not met this goal.** Except for one-day training classes led by outside providers, BTWPCS does not offer trade programming through which students can earn industry-recognized certificates.

While the school issues trade certificates with the NCCER logo, and the phrase “National Center for Construction Education and Research Curriculum,”<sup>32</sup> PCSB staff determined that the school was not accredited by the NCCER until December 10, 2013. Furthermore, the data the school supplied to PCSB as part of the renewal process for enrollment, trade certification, and attendance is riddled with conflicting and missing information.

## 3. Learn appropriate life skills and the responsibilities of citizenship.

Assessment: **BTWPCS’ adult program has met this goal,** as indicated by student attainment of life skills reported in the school’s accountability plans. **BTWPCS’ high school program has partially met this goal.** Although BTWPCS teaches students about life skills and citizenship, PCSB’s qualitative site review showed that students do not exhibit these skills while attending classes at the school.

### **Schoolwide Discipline Rates**

The following tables detail BTWPCS’ adult and high school aggregated discipline rates since 2009-10. PCSB has charter sector averages for these data points starting in 201-12. Red shading indicates that BTWPCS’ rate is above the charter sector average; green shading indicates that the school’s rate is below the charter sector average. BTWPCS is at the sector average for out-of-school suspensions, but has higher rates of long-term suspensions.

BTWPCS: All Programs Out-of-School Suspensions				
	09-10	10-11	11-12	12-13
BTWPCS	5.2% (18 students)	8.2% (29 students)	5.0% (20 students)	12.7% (46 students)
Charter Sector	-	-	13%	14.5%

BTWPCS: All Programs Long-Term Suspensions (10+ Days)				
	09-10	10-11	11-12	12-13 <sup>33</sup>
BTWPCS	1.0% (3 students)	3.0% (12 students)	3.0% (12 students)	2.8% (10 students)
Charter Sector	-	-	1.0%	0.3%

<sup>32</sup> See sample Booker T. Washington PCS Trade Certificate, attached to this report as Appendix J.

<sup>33</sup> In 2012-13, PCSB defined long-term suspension as eleven or more days.

**Adult Programs**

Since 2009-10, the school has set and met targets for its adult program students achieving life skills, including preparing a resume and interviewing for a job, among other things. Since 2010-11, these targets have been specifically for GED students in its daytime and evening programs.

BTWPCS: Adult Education Life Skill Goals <sup>34</sup>		
Year	Target	Target Met?
2009-10	75% of adult learners will prepare a professional resume.	<b>Met</b> 100% of adult learners prepared a professional resume.
2009-10	50% of adult learners will obtain an interview for potential employment.	<b>Not Met</b> 45.5% of students interviewed for employment.
2010-11	60% of GED students will achieve at least 3 life skills goals within 6 months after enrollment.	<b>Met</b> 60% of GED students achieved at least three life skill goals.
2011-12	60% of GED students will achieve at least 3 life skills goals within 6 months after enrollment.	<b>Met</b> 80% of GED students achieved at least three life skill goals within six months after enrollment.
2012-13	60% of GED students will achieve at least 3 life skills goals within 6 months after enrollment.	<b>Met</b> 78% (40 of 51 students) of GED students achieved at least three life skill goals within six months after enrollment.

**High School**

BTWPCS describes the following as evidence that its high school students learn life skills:

- School provides exposure to civic learning principles through history and government classes;
- The school has provided multiple opportunities for students to learn life skills through team building field trips at area camps and outdoor facilities including For Love of Children, Camp Moss Hollow, and George Mason University;
- Students elect Student Council representatives and Student Government Association members;
- School sponsors single-gender mentoring programs to expose students to positive adult mentors, community organizations and resources; and
- Student participation in community service events.<sup>35</sup>

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<sup>34</sup> See Appendices D-G.

## Qualitative Evidence

In February 2013 the PCSB QSR team observed the following during their site visits. These observations, along with the lack of supporting documentation for the above outcomes, do not support that the school is meeting this goal.

During classroom observations, QSR team reviewers noted generally respectful interactions between students and teachers. Students generally responded to teachers' gentle redirection and use of cues to manage behavior. Students demonstrated good behavior as they transitioned to different learning tasks, as evidenced by transitions happening quickly and without incident.

Reviewers noticed throughout classroom observations that many students arrived at class late. In some cases, no students or a very small number of students were present at the beginning of the class, with others trickling in as the lesson progressed.<sup>36</sup>

In September 2013 PCSB conducted an additional QSR, in which the following was observed.

With regard to the goal of students developing appropriate life skills and the responsibilities of citizenship, PCSB saw limited examples of the explicit teaching of life skills and of instruction around citizenship. Teachers in some classes attempted to connect class content to life skills, though presentations by teachers in these classrooms consisted mainly of monologue instruction, with few opportunities for students to explore content and connect to their own lives.

Observers overwhelmingly noted examples of disrespect on the part of students to teachers that went unaddressed within classrooms. PCSB observed the widespread use of cell phones during class, after teachers' repeated attempts to make students put cell phones away. PCSB noted instances of profanity directed towards teachers with little to no consequences within the classroom. PCSB also observed students engaged in off-task behavior after the teachers had asked students to refocus, and students sleeping through classes throughout the school building.<sup>37</sup>

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<sup>35</sup> See Appendix A, p. 11-12.

<sup>36</sup> See Appendix I, p. 2-3.

<sup>37</sup> See Qualitative Site Review Report, dated October 29, 2013, p. 2, attached to this report as Appendix K.

**4. Students will demonstrate high academic skills.**

Assessment: **BTWPCS’ adult program has met this goal.** Since 2009-10 37 adult students have earned high school diplomas, 7 students have passed the GED, and 32 have earned a National External Diploma. **BTWPCS’ high school program has not met this goal.** BTWPCS high school students score consistently below the state average in reading, math, and composition on the DC-CAS, with a 27-30 percentage point proficiency gap in 2012-13.

**Adult Program**

Through its adult education program, BTWPCS adult students can earn high school diplomas or National External Diplomas, or prepare for the General Educational Development (“GED”) test. Each of these programs, as well as the rates of BTWPCS’ adult students earning a diploma or passing the GED test, is described below.

ABE/GED Program

BTW PCS offers an Adult Basic Education and General Educational Development test (“ABE/GED”) program. Until 2010-11 BTWPCS deemed adult students eligible to sit for the GED test if they passed the official GED practice test. Since 2011-12, BTWPCS deems students eligible to sit for the GED if they pass five practice tests – one in each subject tested on the GED (writing, reading, social studies, science, and math).

In 2009-10 and 2010-11, the school set targets regarding student achievement on the practice GED test. Each subject on the GED is scored on a range of 200 to 800. A 2250 cumulative score on all five tests, with no one test score lower than 410, is considered to be a passing score. BTWPCS did not meet this target in 2009-10, but did meet this target in 2010-11.

Booker T. Washington PCS: Adult Education Practice GED Targets <sup>38</sup>		
Year	Target	Target Met?
2009-10	20% of adult learners enrolled in the ABE/GED program will score at least 410 points in each subject area on the official GED practice test.	<b>Not Met</b> <sup>39</sup> 13.6% of students taking the official GED practice test scored 410 points or higher in each subject area.
2010-11	50% of the GED students at the Adult Secondary and Advanced Secondary levels in reading and mathematics will score 410 in three subject areas on the Official GED Practice Test.	<b>Met</b> 63% of students scored at least 410 in three subject areas.

<sup>38</sup> See Appendices D-G.  
<sup>39</sup> See Appendix D, p. 25.

Since 2010-11, the school has set targets that 25% of eligible students will pass the GED. While it has met these targets, the sample size each year is too small to be statistically significant. Altogether, seven BTWPCS adult students have passed the GED since 2010-11.

Booker T. Washington PCS: Adult Education GED Passage Targets <sup>40</sup>		
Year	Target	Target Met?
2010-11	25% of GED students who passed the Official GED Practice Test will successfully pass the GED exam.	<b>Met</b> 25% (1 of 4) of students successfully passed the GED exam.
2011-12	25% of GED students at the Adult Secondary and Advanced Secondary levels who pass all 5 subject areas of GED Practice Tests will pass the official GED exam.	<b>Met</b> 33.3% (1 of 3 <sup>41</sup> ) of eligible GED students passed the official GED.
2012-13	25% of GED students at the Adult Secondary and Advanced Secondary levels who pass all 5 subject areas of GED Practice Tests will pass the official GED exam.	<b>Met</b> 100% (5 of 5) eligible GED students passed the official GED.

Despite achieving these targets, the number of BTWPCS adult students enrolled in the GED program who are prepared by the end of the year to take a GED is less than 10% each year. PCSB staff conducted an on-site review of the school’s GED records from 2009-10 to present, and found documentation to support the following GED passage rates.

BTWPCS: Adult Education GED Attainment			
Year	Students Enrolled <sup>42</sup>	Students Sitting for GED	GED Pass Rate (Among Testers)
2009-10	79	No record	-
2010-11	36	4	25% (1 of 4 students)
2011-12	34	3	33.3% (1 of 3 students)
2012-13	86	5	100% (5 of 5 students)

<sup>40</sup> See Appendices E-G.

<sup>41</sup> BTWPCS reported that two students obtained GEDs in its 2011-12 annual report; however, the school’s accountability plan reported only one student earning a GED. See Appendix H; Appendix F.

<sup>42</sup> Aggregate enrollment for both daytime and evening adult programs for each year

Evening High School Diploma Program

Adult students are eligible to matriculate in the school’s evening diploma program if they are older than 18 and are not currently enrolled in a day high school program.<sup>43</sup> According to the school, its standard for earning this diploma meets OSSE’s graduation requirements. PCSB staff conducted an on-site review of the school’s records of its students’ diplomas from 2009-10 to present, and found documentation to support the following graduation rates.

BTWPCS: Adult Education Evening High School Diploma Program		
	Enrolled Students	Diplomas Awarded
2009-10	34	15
2010-11	28	13
2011-12	30	No record
2012-13	17	9 <sup>44</sup>
2013-14	23	In progress

Daytime National External Diploma Program

In 2010-11, the school began offering the National External Diploma Program (“NEDP”), which is “an applied performance assessment system designed for adults and out-of-school youth that evaluates reading, writing, math and workforce readiness skills of participants in life and work contexts.”<sup>45</sup> A NEDP candidate must demonstrate 100% mastery of 65 NEDP academic competencies, along with one vocational competency to earn a diploma.<sup>46</sup> In BTWPCS’ NEDP program, students study independently for the NEDP exam, scheduling meetings with their instructors as needed.

BTWPCS reported in 2010-11 that 20 students earned NEDP diplomas. In 2011-12 and 2012-13, the school set and met targets regarding the NEDP.

Booker T. Washington PCS: Daytime Adult National External Diploma Program		
Year	Target	Target Met?
2011-12	70% of the NEDP students enrolled by October 5, 2011 will have completed all NEDP requirements for a high school diploma by June 2012.	<b>Met</b> 92.9% (12 of 13 students) earned the National External Diploma by June 2012.

<sup>43</sup> See Appendix H, p. 13.

<sup>44</sup> On its November 14, 2013 site visit, PCSB staff could only find supporting documentation for nine of ten diplomas reported in BTWPCS’ 2012-13 Annual Report. See Appendix G.

<sup>45</sup> See Appendix H, p. 44; see description of the National External Diploma Program, available at [www.casas.org/nedp](http://www.casas.org/nedp).

<sup>46</sup> OSSE, National External Diploma Program (NEDP), <http://osse.dc.gov/service/national-external-diploma-program-nedp>.

2012-13	70% of the NEDP students enrolled by October 5, 2012 will have completed all NEDP requirements for a high school diploma by June 2013.	<p style="text-align: center;"><b>Met</b></p> <p style="text-align: center;">90.9% (20 of 22 students) earned the National External Diploma by June 2013.<sup>47</sup></p>
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### Comprehensive Appraisal Student System

BTWPCS reports that students enrolled in its ABE/GED program take a Comprehensive Adult Student Assessment System (“CASAS”) test when they enroll in the program to assess their reading and math level, and take it again at the end of the program to assess their progress in reading and math.<sup>48</sup> It is recommended that students be pre-tested within twelve hours of enrolling in the education programming, and post-tested at minimum after 40 hours of programming (but preferably after 70-100 hours).<sup>49</sup> BTWPCS has set CASAS progress targets since 2009-10; it has met six of nine of these targets since that time.

The U.S. Department of Education’s National Reporting System for Adult Education divides CASAS and other benchmark scores into six educational functioning levels, from Beginning ABE Literacy (200 and below on CASAS) to High Adult Secondary Education (246 and above on CASAS). Since 2010-11, BTWPCS’ targets have been to move students within – but not beyond – the two lowest educational functioning levels.<sup>50</sup>

Booker T. Washington PCS: Adult Education CASAS Reading and Math Progress Targets		
Year	Target	Target Met?
2009-10	65% of adult learners will move to next educational functioning level as indicated by the CASAS post-test data.	<p style="text-align: center;"><b>Not Met</b></p> <p style="text-align: center;">63.63% of students progressed to next level.</p>
2010-11	50% of GED students enrolled at the Advanced Basic Skills Level will progress to the Adult Secondary Level in reading on the CASAS.	<p style="text-align: center;"><b>Not Met</b></p> <p style="text-align: center;">40% of students progressed to the Adult Secondary Level.</p>
	50% of GED students enrolled at the Adult Secondary Level will progress to the Advanced Adult Secondary Level in reading on the CASAS.	<p style="text-align: center;"><b>Met</b></p> <p style="text-align: center;">75% of students progressed to the Advanced Adult Secondary Level.</p>

<sup>47</sup> While BTWPCS listed 22 students earning NEDP diplomas in its 2012-13 Annual Report, only 20 students were reported as earning diplomas as part of the accountability plan process. See Appendix C; Appendix G.

<sup>48</sup> See Appendix D, p. 9.

<sup>49</sup> See National Reporting System for Adult Education, “State Assessment Policy Guidance,” U.S. Department of Education, revised January 6, 2011, attached to this report as Appendix L, available at <http://www.nrsweb.org/docs/pubs/AssessmentPolicyGuidance.pdf>.

<sup>50</sup> See NRS Test Benchmarks for Educational Functioning Levels, attached to this report as Appendix M.

	50% of GED students enrolled at the Intermediate Basic Skills Level will progress to the Advanced Basic Skill Level in mathematics on the CASAS.	<b>Met</b> 75% of students progressed to the Advanced Basic Skill Level.
	50% of GED students enrolled at the Advanced Basic Skills Level will progress to the Adult Secondary Level in mathematics on the CASAS.	<b>Not Met</b> 45% of students progressed to the Adult Secondary Level.
2011-12	70% of students whose CASAS Life and Work and Employability pre-test scores are 153-201 will progress 5 points on the CASAS life and Work and Employability Reading and Math Assessments for those who post test.	<b>Met</b> 83% (5 of 6 students) progressed 5 points.
	70% of students whose CASAS reading and math pre-test score is 211+ will progress 3 points on the CASAS Life and Work and Employability assessments for those who post test.	<b>Met</b> 76% progressed 3 points
2012-13	70% of students whose CASAS Life and Work and Employability pre-test scores are 153-201 will progress 5 points on the CASAS life and Work and Employability Reading and Math assessments for those who post-test.	<b>Met</b> 78.4% (29 of 37 students) progressed 5 points.
	70% of students whose CASAS reading and math pre-test score is 211+ will progress 3 points on the CASAS Life and Work and Employability assessments for those who post-test.	<b>Met</b> 78.4% (40 of 51 students) progressed 3 points.

### Qualitative Evidence

In February 2013, the PCSB QSR team observed the following of Booker T. Washington PCS' GED classes as well as credit recovery classes and observed the following.

Because of the relatively small number of students in each class, instructors generally had the opportunity to work one-on-one with students and scaffold instruction. The observer did note that the instructor was persistent in explaining content to students in various ways though students still did not seem to grasp the content during the observation.<sup>51</sup>

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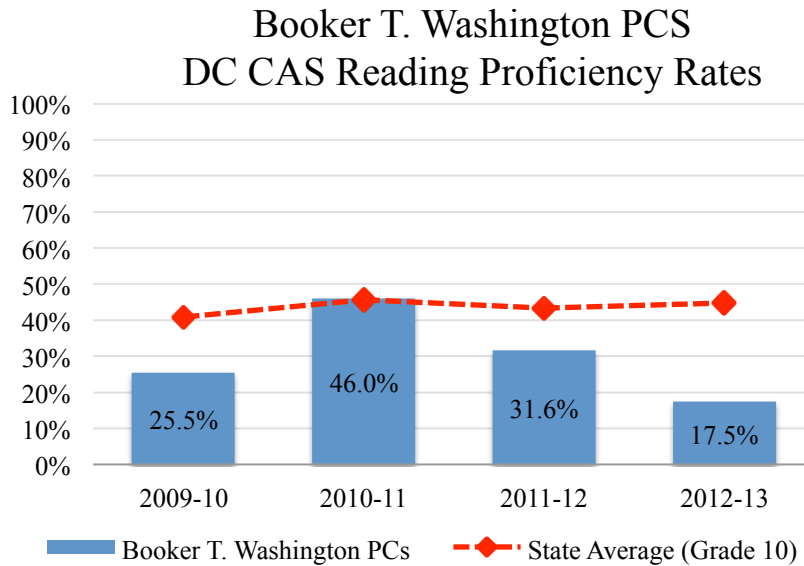
<sup>51</sup> See Appendix I.



## High School

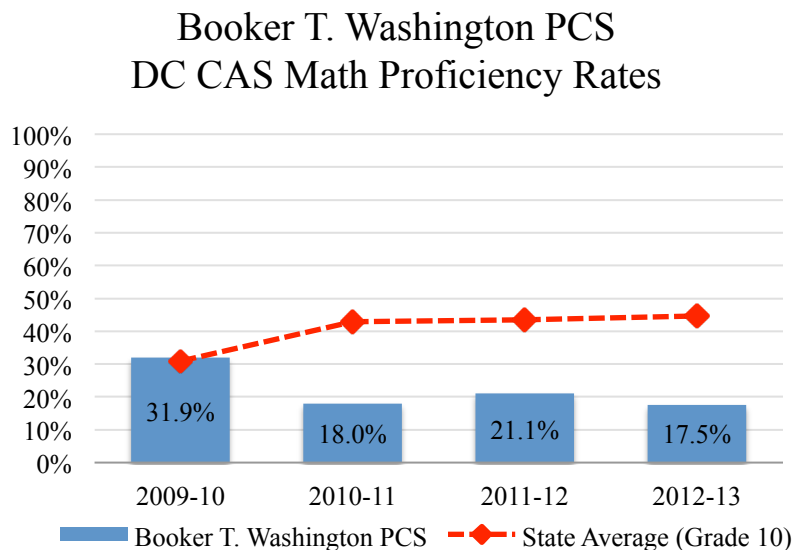
### Reading Proficiency

Reading proficiency rates of BTWPCS high school students have decreased since 2010-11. In 2012-13, the school's reading proficiency rate was less than half of the state high school average.



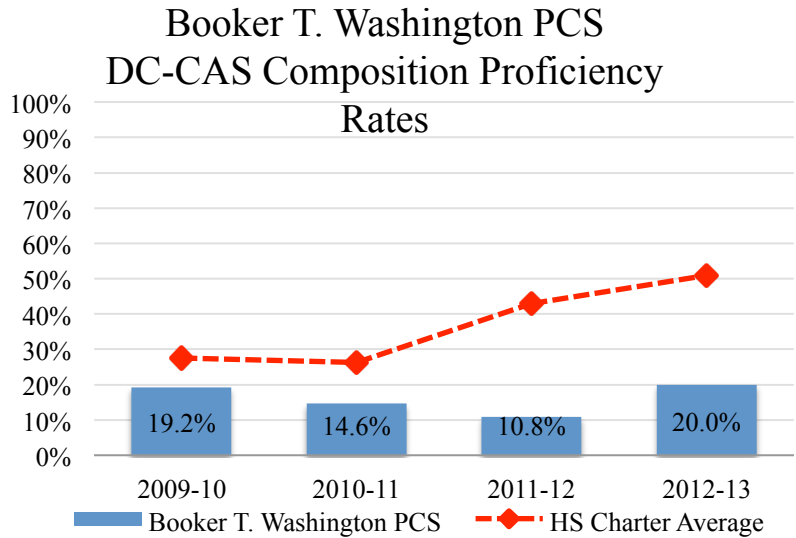
### Math Proficiency

Since 2010-11, BTWPCS' math proficiency rates have been less than half the state high school average.



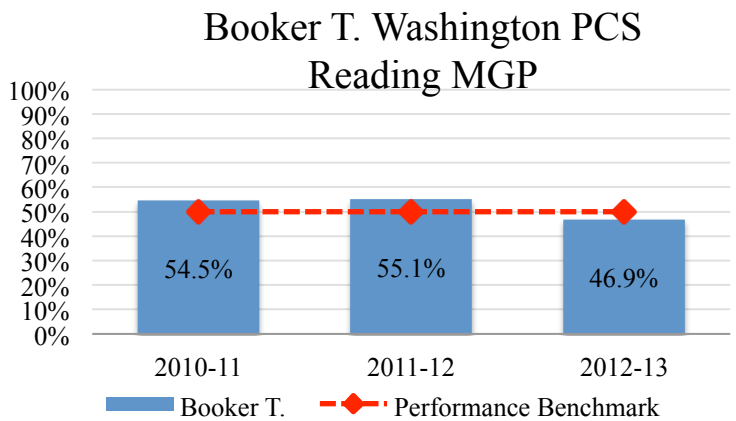
### Composition Proficiency

Booker T. Washington PCS’ composition proficiency rates have been below the public charter high school average for each of the past four years, and less than half the charter high school average for the past two years.



### Reading Growth

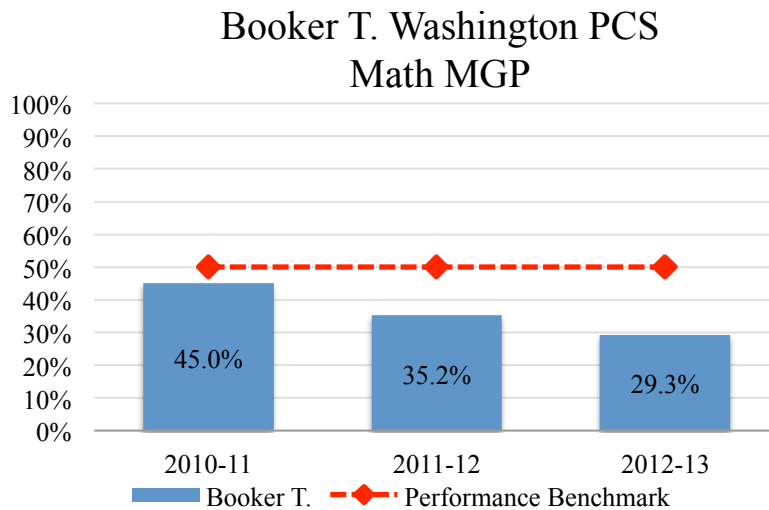
The graph below represents Booker T. Washington PCS’ reading median growth percentile (“MGP”), the median of its individual students’ growth percentiles.<sup>52</sup> An MGP of 50 indicates that a school’s students have “average” growth in reading proficiency, as compared to other DC students in the same grades and with the same initial DC CAS performance. In all three years, Booker T. Washington PCS’ reading MGP was at or around the 50th percentile.



<sup>52</sup> A student’s growth percentile (“SGP”) can range from 1 to 99, and reflects that students’ academic growth compared to that of other DC students in their grade with similar initial proficiency. For example, a student with a reading SGP of 77 has grown in reading proficiency (as measured by the DC CAS) as much or more than 77% of his/her peers.

## Math Growth

The graph below represents Booker T. Washington PCS' math median growth percentile ("MGP"), the median of its individual students' growth percentiles.<sup>53</sup> An MGP of 50 indicates that a school's students have "average" growth in math proficiency, as compared to other DC students in the same grades and with the same initial DC CAS performance. Booker T. Washington PCS' math MGP has been below the 50th percentile since 2010-11 and declined each year.



## Qualitative Evidence

In February 2013, the PCSB QSR team observed the following of Booker T. Washington PCS' high school program.

The quality of instructional delivery at Booker T. Washington PCS was generally poor... During classroom observations, content was generally surface-level, with few teachers used questioning to deepen student knowledge, focusing instead on low level, single line of inquiry questioning... Observers saw mostly teacher-led instruction, with "paper and pencil" learning tasks, requiring little critical thinking...<sup>54</sup>

In September 2013, PCSB conducted another QSR, in which the following was observed.

Observers noted that students had limited opportunities to demonstrate high academic skills. In those instances where students did have the opportunity to demonstrate their learning

<sup>53</sup> A student's growth percentile ("SGP") can range from 1 to 99, and reflects that students' academic growth compared to that of other DC students in their grade with similar initial proficiency. For example, a student with a reading SGP of 77 has grown in reading proficiency (as measured by the DC CAS) as much or more than 77% of his/her peers.

<sup>54</sup> See Appendix I.

they frequently appeared unwilling to do so. In some classrooms, the teacher’s monologue lecture dominated instruction and students did not have any opportunities to demonstrate what they knew about the content. In a few of these classes, students were simply asked to read along in the text book about terms dealing with the content, while the teacher explained the terms further; at no point were students given the opportunity to demonstrate their knowledge of the content. In another classroom observed, a student asked the teacher if she was going to grade the warm up, because according to the student, the teacher “never collects it.” In a few math classrooms, the teacher asked students to come up to the board to write out the solutions to problems, though few students volunteered to do so. In one such class, some students were paying attention by taking notes, other students were engaged in off-topic conversation, and other students had nothing on their desks but were checking their phones.<sup>55</sup>

**5. The school will maintain stable student enrollment.**

**Assessment: BTWPCS’ adult program has not met this goal.** BTWPCS has regularly submitted incomplete adult education attendance data to PCSB’s data systems, and has reported adult attendance rates lower than all other DC adult charter programs.<sup>56</sup> **BTWPCS’ high school program has not met this goal.** The school’s high school enrollment has decreased each year since 2009-10, and both its reenrollment and attendance rates have been below the charter sector average since that time.

Enrollment in BTWPCS’ adult education programs since 2009-10 is summarized in the table below.

BTWPCS: Adult Education Reported Enrollment <sup>57</sup>				
Year	Daytime Enrollment	Evening Enrollment	Total Reported Enrollment	Audited <sup>58</sup> Enrollment
2009-10	64	134	198	116
2010-11	134	139	173	121
2011-12	57	147	204	191
2012-13	46	175	221	155
2013-14 <sup>59</sup>	Not reported	263	370 <sup>60</sup>	-

<sup>55</sup> See Appendix K, p. 6.

<sup>56</sup> For example, the school reported a 50.2% average attendance rate in 2012-13, compared to the adult education charter average of 70.9%. BTWPCS did not respond to PCSB’s requests to validate this data.

<sup>57</sup> In the 2009-10, 2010-11, and 2011-12 school years, evening enrollment numbers were reported by the school in its annual reports. In 2012-13 and 2013-14, enrollment numbers by course were estimated by PCSB.

<sup>58</sup> It is typical in an adult education program, where classes do not meet on a daily basis, for the enrollment audit numbers to be lower than the actual number of students who enroll for at least 12 hours in a program throughout the course of the year.

Since 2010-11, BTWPCS has set targets in its adult accountability plans for only its adult students enrolled in GED programming (a small portion of its total adult students), as described in the table below.

BTWPCS: Adult Education Attendance Targets <sup>61</sup>		
Year	Target	Target Met?
2010-11	On average, GED students will attend school 70% of the time.	<b>Met</b> The average daily attendance was 72%.
2011-12	GED student average attendance rate will be 70%.	<b>Met</b> GED student average attendance rate was 87%.
2012-13	GED student average attendance rate will be 70%.	<b>Met</b> GED student average attendance rate was 71.6%.

While the school has met attendance targets for this one program, the school’s overall adult education attendance rates are the lowest reported to PCSB of any adult education charter school in DC. In 2012-13, BTWPCS’ adult education attendance rate reported to PCSB was 50.2%, compared to the adult education charter average of 70.9%. Booker T. Washington PCS never responded to PCSB’s requests to validate this data.

**Evening Adult Program: Enrollment and Attendance**

Evening Adult Enrollment

Since 2012-13, Booker T. Washington PCS’ evening adult programs have not maintained records of student enrollment broken out by program. PCSB estimated evening enrollment numbers by analyzing paper attendance records and class rosters, as well as summary evening enrollment data provided for select years by the school. While it is BTWPCS’ practice to accept evening students after the District of Columbia’s statewide count day, it only had enrollment records for these students for 2012-13 (those students are included in the table below). Because students can participate in more than one program/course, they may be counted more than once in the table below.

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<sup>59</sup> Booker T. Washington PCS provided a written summary of enrollment that has not been validated by PCSB.

<sup>60</sup> Unaudited OSSE student enrollment figures dated October 2013.

<sup>61</sup> See Appendices D-G.

BTWPCS: Evening Adult Estimated Enrollment by Course <sup>62</sup>					
	09-10	10-11	11-12	12-13	13-14 <sup>63</sup>
Core Curriculum	40	30	30	32	106
Stationary Steam Engineering	16	35	40	59	60
Electrical	10	8	10	44	47
HVAC	19	25	25	24	No records
Plumbing	No records	No records	No records	3	No records
GED	15	13	12	68	27
High School Diploma	34	28	30	17	23
<b>Total Evening Students</b>	<b>134</b>	<b>139</b>	<b>147</b>	<b>175</b>	<b>263</b>

### Evening Adult Attendance

During a scheduled on-site visit, which was conducted as part of the renewal process, PCSB collected BTWPCS' 2013-14 evening adult education attendance records, and found more than half of them to be substantially incomplete (likely indicating a considerable underreporting of absences to PCSB).<sup>64</sup> For many class days, students were not recorded as being present or absent, making it impossible for PCSB to calculate adult attendance using its normal business rules.

While evening adult classes had been in session for over two months at the time of PCSB's examination of attendance records, the median evening adult student had attended only six days of class. Overall, the estimated attendance rate would be 29.7%.<sup>65</sup> The following table breaks out estimated attendance rate by program. The attendance rate was estimated by dividing the average number of class days attended by the total number of class days in each program.

<sup>62</sup> In the 2009-10, 2010-11, and 2011-12 school years, evening enrollment numbers were reported by the school in its annual reports. In 2012-13 and 2013-14, enrollment numbers by course were estimated by PCSB.

<sup>63</sup> Booker T. Washington PCS provided a written summary of enrollment that were not validated by PCSB.

<sup>64</sup> Records were found to be incomplete for reasons such as reporting attendance data for a different number of days each week (e.g., four days of class the first week, one day the next week, and two days the following week); for reporting attendance data for days which do not exist; or for a mismatch between a student's program or schedule and reported attendance (e.g., a student listed in a Monday/Wednesday class but attendance only reported for one day each week).

<sup>65</sup> PCSB compared the total number of days marked present on students' paper attendance records to the number of potential class days so far in the 2013-14 school year in the students' programs, which was estimated to be 16 potential class days for trade classes and 36 potential class days for GED and evening high school classes.

BTWPCS: Evening Adult 2013-14 Attendance <sup>66</sup>				
Course	Class sessions per week	Total Class Days	Average Classes Each Student Attended	Estimated Attendance Rate
Trade	2 <sup>67</sup>	16	5.9	36.9%
GED	4	36	6.5	18.1%
HS Diploma	4	36	11.4	31.7%

### **Day Adult Program: Enrollment and Attendance**

#### Daytime Adult Enrollment

BTWPCS reported the following daytime adult enrollment since 2009-10. Because day adult students can participate in both the virtual enterprise program as well as the ABE/GED or NEDP program, they may be counted more than once in the table below.

BTWPCS: Daytime Adult Enrollment					
Year	ABE/GED	Virtual Enterprise	National External Diploma Program	Other	Total Unique Students
2009-10	64	64	0	0	64
2010-11	23	23	11	0	34
2011-12	22	7	14	9	57
2012-13	18	17	27	0	46

#### Daytime Adult Attendance

The following table breaks out estimated attendance rate by program as reported by BTWPCS to PCSB. PCSB has not validated this data. The attendance rate was estimated by dividing the median number of class days/hours attended per student by the median number of total class days/hours students were enrolled.

<sup>66</sup> These rates were calculated from BTWPCS' first day of school to November 14, 2013.

<sup>67</sup> Booker T. Washington PCS' 2012-13 annual report, attached to this report as Appendix C, lists electrical wiring as meeting twice per week; however, all students in the course were listed as being scheduled for the course once per week.

BTWPCS: Daytime Adult Attendance			
Year	Median time enrolled per student	Median time attended per student	Attendance rate
2009-10	46 days	26.5 days	57.6%
2010-11	66 days	35 days	53.0%
2011-12	25 days	15 days	60.0%
2012-13	134 hours	86 hours	64.2%

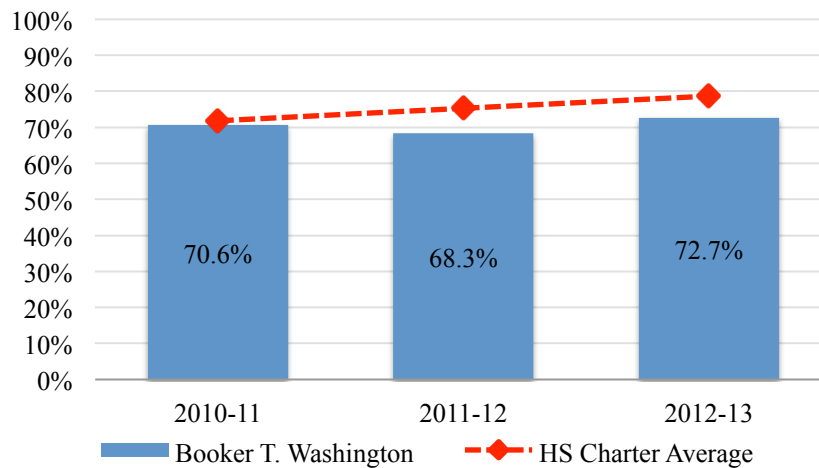
### **High School Enrollment, Reenrollment, and Attendance**

BTWPCS' high school enrollment has decreased each year since 2009-10.

BTWPCS: High School Enrollment	
Year	Students Enrolled
2009-10	234
2010-11	229
2011-12	217
2012-13	207
2013-14	180

BTWPCS' high school reenrollment rate has been below the charter average since 2010-11, with this gap increasing each year. In 2012-13, the school's reenrollment rate was 10.3 percentage points below the charter average.

### Booker T. Washington PCS High School Reenrollment

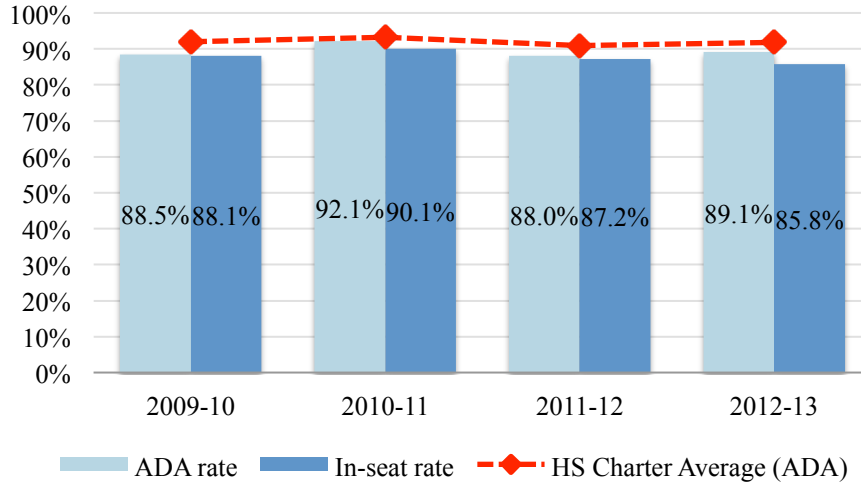




Attendance

Booker T. Washington PCS' attendance rate has been below the charter average since 2009-10.

Booker T. Washington PCS: Grades 9-12  
Attendance Rate



In September 2013, the PCSB QSR team observed the following of Booker T. Washington PCS' high school program.

The limited numbers of students in many classrooms made observers question the stability of either enrollment or attendance rates. In some of the upper level trade classes very few students were present. One such upper level trade class had enrolled only one student. In another trade class observed only two students were present. During the weeks of classroom observations observers noted that many students in these classrooms were attending the classrooms for the first time. For example, in at least two English Language Arts classes observed, a few students had no idea what the class was doing, and observers heard the students tell the teacher that it was their first day. In one classroom observed, eleven students were present in a class that had 25 chairs and desks. Another PCSB staff member observed that many classrooms had between three and five students present throughout the class.<sup>68</sup>

<sup>68</sup> See Appendix K.

**6. To establish relationships with community stakeholders such as, but not limited to, unions, contractors, or government placement agencies.**

Assessment: **BTWPCS' adult and high school program has met this goal.**

The school described and provided supporting documentation for the following partnerships with community stakeholders:

- The Dalai Lama visited the school and arranged for a group of students to visit the International Campaign for Tibet;
- In 2012-13, the school received an 18-month grant from WMAT to train high school students in the electrical technical arts;
- In 2012, students began a dual-enrollment program with UDC's Community College;
- The school has sustained a ten-year partnership with the General Services Administration offering afterschool programming to students in the AutoCAD program through the Architecture, Construction and Engineering Mentoring and Scholarship Program;
- A relationship with the Urban Alliance Internship program;
- Students participated in a play sponsored by the Shakespeare Theatre;
- Arena Stage provides job shadowing opportunities;
- BTWPCS students have been placed at the Joint School of Carpentry for one-week apprenticeship training;
- Clark Construction provides educational support to students;
- MC Dean and Shapiro and Duncan have provided opportunities to learn about the construction industry;
- The Architect of the Capitol will provide job shadowing opportunities for high school students in school year 2013-14; and
- Trueland Electrical supports students on-site and through summer internship opportunities.<sup>69</sup>

**7. The school will maintain a stable and qualified faculty.**

Assessment: **BTWPCS' adult and high school programs have met this goal.** The majority of the school's teachers are qualified in their field and the school's faculty attrition rate is on par with other DC charter schools.

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<sup>69</sup> See Appendix A, p. 15-16.

Booker T. Washington PCS Faculty and Staff Data <sup>70</sup>				
	Number of Teachers	Teacher attrition rate	Percent of highly qualified teachers	Vocational/Career Teachers with Degree and/or license in field
2009-10	26	4% (1 teacher)	100%	4 of 6
2010-11	25	19% (5 teachers)	100%	2 with degrees in field; teachers with licenses not reported
2011-12	23	22% (5 teachers)	95.8%	4 of 6
2012-13	26	19% (5 teachers)	95.2%	Not reported

**8. Students will pursue post-secondary educational opportunities.**

Assessment: **BTWPCS’ adult program has not met this goal.** The school does not track post-secondary and/or employment outcomes for its adult students. **BTWPCS’ high school program has not met this goal.** A minority of BTWPCS high school graduates enroll in a post-secondary institution, and the school does not track its high school graduates’ employment outcomes.

**High School Program**

In its renewal application, Booker T. Washington PCS provided data from the National Student Clearinghouse supporting its high school alumni’s college enrollment and persistence, and degree attainment. The school does not keep records of its high school graduates’ employment outcomes.

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<sup>70</sup> See Appendices C, D, and L; Booker T. Washington PCS 2011-12 Annual Report, attached to this report as Appendix N.

Booker T. Washington PCS: High School Program College Enrollment, Persistence, and Graduation <sup>71</sup>									
	2005	2006	2007	2008	2009	2010	2011	2012	Total
Graduating High School Students	36	43	59	59	61	54	64	55	431
Enrollment – Fall immediately after high school	6	15	12	24	18	22	24	28	34.6% (149 students)
Enrollment – Any time within two years of high school	11	17	20	30	29	27	-	-	42.9% (134 students)
Persistence – Returning for second year of college	4	12	10	17	14	16	-	-	23.4% (73 students)
Graduation – Obtaining degree within four years	0	3	-	-	-	-	-	-	3.8% (3 students)
Graduation – Obtaining degree within six years	0	8	-	-	-	-	-	-	10.1% (8 students)

<sup>71</sup> Source: National Student Clearinghouse report, attached to this report as Appendix X.

## **SECTION TWO: COMPLIANCE WITH APPLICABLE LAWS**

The SRA requires that PCSB not approve a renewal application if it determines that the school has materially violated applicable laws.<sup>72</sup> The SRA contains a non-exhaustive list of applicable laws, and PCSB also monitors charter schools for compliance with additional laws. The following section identifies these laws and includes a determination of whether BTWPCS has complied with these laws.

Since 2009-10, BTWPCS has been in substantial compliance with applicable laws assessed in PCSB’s annual compliance review, as detailed in the table below.

<b>Compliance Item</b>	<b>Description</b>	<b>School’s Compliance Status from 2009-10 to present</b>
<b>Fair enrollment process</b> SRA § 38-1802.06	DC charter schools must have a fair and open enrollment process that randomly selects applicants and does not discriminate against students.	Compliant since 2009-10
<b>Notice and due process for suspensions and expulsions</b> SRA § 38-1802.06(g)	DC charter school discipline policies must afford students due process <sup>73</sup> and the school must distribute such policies to students and parents.	Compliant since 2009-10
<b>Student health and safety</b> SRA § 38-1802.04 (c)(4); DC Code §4-1321.02; DC Code § 38-651	The SRA requires DC charter schools to maintain the health and safety of its students. <sup>74</sup> To ensure that schools adhere to this clause, PCSB monitors schools for various indicators, including but not limited to whether schools: <ul style="list-style-type: none"> <li>- have qualified staff members that can administer medications;</li> <li>- conduct background checks for all school employees and volunteers; and</li> <li>- have an emergency response plan in place and conduct emergency drills as required by DC code and regulations.</li> </ul>	Compliant since 2009-10

<sup>72</sup> SRA § 38.1802.12 (c).

<sup>73</sup> See *Goss v. Lopez*, 419 U.S. 565 (1975).

<sup>74</sup> SRA § 38.1802.04 (c)(4)(A).

<b>Equal employment</b> SRA §§ 38-1802(c)(5)	A DC charter school's employment policies must comply with federal and local employment laws and regulations.	Compliant since 2009-10
<b>Insurance</b> As required by the school's charter	A DC charter school must be adequately insured.	Compliant since 2009-10
<b>Facility licenses</b> DC code § 47-2851.03(d); DC regulation 14-1401	A DC charter school must possess all required local licenses.	Compliant since 2009-10
<b>High Quality Teachers</b> Elementary and Secondary Education Act ("ESEA")	DC charter schools receiving Title I funding must employ "Highly Qualified Teachers" as defined by ESEA.	Compliant since 2009-10
<b>Proper composition of board of trustees</b>  SRA § 38-1802.05	A DC charter school's Board of Trustees must have: an odd number of members that does not exceed 15; a majority of members that are DC residents; and at least two members that are parents of a student attending the school.	Compliant since 2009-10
<b>Articles of incorporation and by-laws</b> SRA § 38-1802.02(8)	A DC charter school must have up-to-date articles of incorporation and by-laws.	Compliant since 2009-10
<b>Accreditation Status</b> SRA § 38-1802.02(16)	A DC charter school must maintain accreditation from an SRA-approved accrediting body approved by the SRA.	Compliant since 2009-10

### **PCSB Board Actions**

In September 2009, PCSB issued a Notice of Concern to Booker T. Washington PCS because the school did not submit in a timely manner documentation for 27 of 29 compliance areas as required by PCSB's

compliance monitoring process in place at that time.<sup>75</sup> In October 2009, the school was issued a second Notice of Concern for the two outstanding compliance areas for which it had not submitted required documentation (the school had not submitted an inventory of its assets, or its Basic Business License).<sup>76</sup> The PCSB Board voted to lift the Notice of Concern in December 2009.<sup>77</sup>

In the 2010-2011 school year, PCSB issued a Notice of Concern to Booker T. Washington PCS because the school had a third quarter truancy rate of 24.79%; PCSB lifted the Notice of Concern in December 2010.<sup>78</sup>

### **Students Non-Verified as DC Residents**

In 2012-13, OSSE found that BTWPCS had not verified 17 of its students to be DC residents, in violation of the school's responsibility per DC regulations. (In total that year, OSSE found 40 students across the charter sector to be non-verified as DC residents, meaning that BTWPCS had 42% of the cases despite representing just over 1% of charter enrollment).<sup>79</sup>

### **Procurement Contracts**

SRA §38-1802.04(c)(1) requires DC charter schools to utilize a competitive bidding process for any procurement contract valued at \$25,000 or more, and within three days of awarding such a contract, to submit to PCSB all bids received, the contractor selected, and the rationale for which contractor was selected. To ensure compliance with this law, PCSB requires schools to submit a Determinations and Findings form to detail any qualifying procurement contract that the school has executed.

From FY2009-2012, the school did not submit any determination and finding forms for contracts at or above \$25,000. This is despite the fact that the school's annual audit identified nine \$25,000+ expenditures in FY2011 and seven in FY2012. (The audit did not report on \$25,000+ expenditures prior to FY2011.) The school submitted one determination and findings form to date in FY2013 - with Exceptional Education Management Corporation.

### **Special Education Compliance**

Charter schools are required to comply with all federal and local special education laws, including,

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<sup>75</sup> See Letter to Dr. Richard English, Board Chair, Booker T. Washington PCS, from Thomas A. Nida, Board Chair, PCSB, dated September 24, 2009, attached to this document as Appendix O.

<sup>76</sup> See Letter to Dr. Richard English, Board Chair, Booker T. Washington PCS, from Thomas A. Nida, Board Chair, PCSB, dated November 2, 2009, attached to this document as Appendix P.

<sup>77</sup> Board Action Proposal, Compliance Review Results – Lift Board Action: Extended Notice of Concern, School Performance Team, dated December 15, 2009, attached to this document as Appendix Q.

<sup>78</sup> See Letter to Mr. Richard English, Board Chair, Booker T. Washington PCS, from Brian Jones, Board Chair, PCSB, dated December 21, 2010, attached to this document as Appendix R.

<sup>79</sup> See OSSE, Reported Non-Resident Student Review and Findings, dated June 7, 2013, p. 5, attached to this report as Appendix S; see also DC regulations 5-A DCMR § A5002.1.

among others, the Individuals with Disabilities Education Act<sup>80</sup> (“IDEA”) and the Rehabilitation Act of 1973.<sup>81</sup> Until August 2013 when it amended its charter,<sup>82</sup> BTWPCS operated as a “dependent charter” for federal special education purposes, meaning that DC Public Schools worked with BTWPCS as it would a traditional DCPS school to service the school’s special education students.

Because of its dependent charter status, the school’s special education compliance performance is, for the most part, reported by OSSE as part of DCPS’ overall compliance performance, and compliance data specific to BTWPCS students is limited. The following section summarizes BTWPCS’ special education compliance from 2010 to the present.

#### References to Special Education in School Charter

References in a school’s Charter to special education must comply with special education laws. BTWPCS’ description in its Charter of its special education programming complies with special education laws.

#### OSSE Special Education Compliance Reviews

The DC Office of the State Superintendent of Education (“OSSE”) monitors charter schools’ special education compliance and publishes three types of reports detailing these findings: (1) Annual Determinations; (2) On-Site Monitoring Reports; and (3) Quarterly Findings. However, due to BTWPCS’ dependent charter status until August 2013, OSSE only assessed BTWPCS’ special education compliance separate from DCPS in its Quarterly Findings reports.

#### Quarterly Findings

OSSE submits quarterly reports to the U.S. Department of Education’s Office of Special Education Programs detailing DC LEAs’ compliance in three areas: (1) Initial and Reevaluation Timelines; (2) Early Childhood Transition Timelines; and (3) Secondary Transition Requirements. OSSE notified Booker T. Washington PCS that the school was noncompliant for timely completion of student reevaluations over the past three quarters (October 1-December 31, 2012, January 1-March 31, 2013, and April 1- June 30, 2013).<sup>83</sup> OSSE confirms that all of these points of noncompliance remain uncured, and that the school’s deadline to cure them is one year from the time each Quarterly Findings report was published.

#### Blackman-Jones Implementation Review

With compliance requirements pursuant to IDEA and the 2006 Blackman-Jones Consent Decree, OSSE manages and oversees the Blackman Jones database that tracks each LEA’s timely implementation of Hearing Officer Determinations (“HODs”) and Settlement Agreements.

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<sup>80</sup> 20 USC §1413(a)(5).

<sup>81</sup> 20 USC §794.

<sup>82</sup> SRA §38-1802.10(c). See BTWPCS August 2013 amendment, attached to this report as Appendix T.

<sup>83</sup> See BTWPCS Quarterly Findings Reports, attached to this report as Appendix U.



As of November 2013, OSSE's database indicates the Blackman Jones Database indicates BTWPCS has two open HODs that it has not resolved by the required deadlines – one being 40 days overdue, and the other 19 days overdue. OSSE sent a notice to the school on November 19, 2013 noting that the school had not responded to OSSE's three previous messages regarding these outstanding HODs, and requesting the school resolve the outstanding issues immediately.<sup>84</sup>

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<sup>84</sup> See November 2013 OSSE notice to BTWPCS, attached to this report as Appendix V.

## **SECTION THREE: FISCAL MANAGEMENT AND ECONOMIC VIABILITY**

Separate and apart from the standard for charter renewal, the SRA requires the Board to revoke a charter at any time if it determines that the school:

- Has engaged in a pattern of nonadherence to generally accepted accounting principles;
- Has engaged in a pattern of fiscal mismanagement; or
- Is no longer economically viable.

In the following section PCSB has analyzed Booker T. Washington PCS' financial audits in these areas.

### **Adherence to Accounting Principles**

The school has consistently adhered to generally accepted accounting principles, as established by the Financial Accounting Standards Board.

### **Fiscal Management**

Per its audited financial statements, BTWPCS has not engaged in fiscal mismanagement. The school's audit reports reflect sound accounting and internal controls, and no instances of noncompliance that are required to be reported per the U.S. Government Accountability Office's Auditing Standards.

### **Economic Viability**

Booker T. Washington PCS is in danger of being no longer economically viable, based on the school's financial performance, sustainability, liquidity, and debt burden, as described below.<sup>85</sup> In the fiscal year 2013 draft financial audit, the auditor did not indicate that the school is no longer a going concern. However, the school's financial performance produced a \$551,520 operating deficit in fiscal year 2013, which is its third operating deficit over the last four fiscal years. The school's net assets have dropped to negative \$365,748 since fiscal year 2011. The school's cash liquidity remains weak with "days of cash on hand" ranging from 0 to 19 throughout the past five fiscal years. The school's debt burden increased to at end of fiscal year 2013 as the school relied on a \$200,000 line of credit to meet regular expenses. Management projects that net assets will increase to \$1.5 million and cash liquidity will improve to \$1.4 million at the end of fiscal year 2014 as a result of substantial enrollment gains and approximately \$150,000 cost reductions. However, as noted in the report many of these enrollment gains are questionable given the small fraction of enrolled adult students actually attending classes. Based on the school's past five years financial performance, it is questionable as to whether the projected FY2014 results are achievable and sustainable.

### **Financial Performance**

PCSB assesses a school's financial performance with two key indicators. The first indicator is a school's "operating result" – how much its total annual revenues exceed its total annual expenditures. In general, PCSB recommends that a school's annual operating results equal at least zero. Another indicator of a

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<sup>85</sup> See Booker T. Washington PCS activities and financial analysis sheet, included in the report's appendix as Attachment W.

school’s financial performance is its earnings before depreciation (“EBAD”),<sup>86</sup> a financial performance measure that eliminates the effects of financing and accounting decisions.

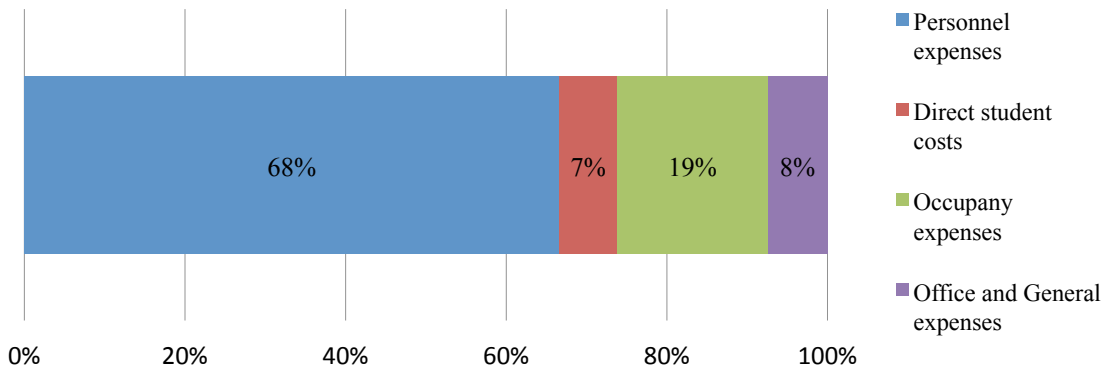
Booker T. Washington’s financial performance has fluctuated with three operating deficits over the past five audited years. In fiscal year 2013, the school produced an operating deficit of \$551,520, after a \$273,000 operating surplus in fiscal year 2012. BTWPCS attributes the FY2013 deficit to a drop in its high school enrollment, decline in federal funding, and unbudgeted investment in its adult education and special education programs.. The school’s EBAD has similarly fluctuated from FY2009 to FY2013. Booker T. Washington PCS had positive earnings before depreciation in only two of the past five fiscal years.

Fiscal Period	2009	2010	2011	2012	2013
Operating Result	\$97,719	\$(140,698)	\$(221,129)	\$272,959	\$(551,520)
EBAD	\$133,580	\$(106,100)	\$(175,331)	\$334,365	\$(491,385)

Expenditures

Booker T. Washington PCS’ spending decisions, illustrated in the graph below, are aligned with PCSB’s financial metrics for general education public charter schools.<sup>87</sup>

**Expenditures as % of Revenues  
(FY2009 - FY2013 averages)**



<sup>86</sup> EBAD equals change in net assets plus amortization and depreciation.

<sup>87</sup> Note that the percentage does not equal 100% because expenditures exceeded revenues on average.

### Sustainability

A school's net assets<sup>88</sup> and primary reserve ratio demonstrate its sustainability.<sup>89</sup> PCSB recommends that schools accrue net asset reserves equal to three to six months of operational expenditures. In FY2013, the school's net asset reserves were negative \$365,748, a decrease from \$185,722 in FY2012.

The school's FY2013 primary reserve ratio was negative 0.06, meaning that its net asset reserves equal negative 6% of its annual expenditures. The table below details the school's net assets and primary reserve ratios over the past five years.

Fiscal Period	2009	2010	2011	2012	2013
Net Assets	\$253,807	\$133,942	\$(87,187)	\$185,772	\$(365,748)
Primary Reserve Ratio	0.06	0.02	-0.02	0.03	-0.06

### Liquidity

Two indicators of a school's short-term economic viability are its current ratio<sup>90</sup> and its days of cash on hand.<sup>91</sup> A current ratio greater than one indicates a school's ability to satisfy its immediate financial obligations. Since FY2009, BTWPCS's current ratio has been at least one in three of the past five years. At end of fiscal year 2013, the school's current ratio dropped to 0.33 from 1.02 in the prior year.

Typically, 90 days or more of cash on hand indicates a school can satisfy immediate obligations with cash; less than 30 days of cash on hand is a liquidity concern. BTWPCS's days of cash on hand have been weak over the last five years, with the school's days of cash on hand decreasing from 19 days in 2009 to two days in FY2013. The school's current ratio and days of cash on hand trends are detailed in the table below.

Fiscal Period	2009	2010	2011	2012	2013
Current Ratio	1.24	1.00	0.68	1.02	0.33
Days of Cash on Hand	19 <sup>92</sup>	0	6	5	2

Cash flow from operations indicates whether a school produces adequate cash flow to meet its operating needs. Since FY2009, Booker T. Washington PCS has maintained positive cash flow from operations, except with negative \$194,780 in FY2013, as detailed in the below table.

<sup>88</sup> Net Assets equals total assets minus total liabilities.

<sup>89</sup> Primary Reserve Ratio equals total net assets divided by total annual expenses.

<sup>90</sup> Current assets divided by current liabilities. Current refers to the 12 months or normal operating cycles that a school can convert certain assets into cash or use up or settle certain obligations.

<sup>91</sup> Unrestricted cash and cash equivalents divided by total expenditures divided by 360 days.

<sup>92</sup> Note that there was no breakdown for unrestricted and restricted cash in FY2009, so total cash was analyzed.

Fiscal Period	2009	2010	2011	2012	2013
Cash Flow from Operations	\$181,176	\$234,092	\$59,913	\$370,723	\$(194,780)

Debt Burden

A school's debt ratio<sup>93</sup> indicates the extent to which a school relies on borrowed funds to finance its operations. Ideal debt ratios are below 0.60, and PCSB considers anything above 0.92 to be a cause for concern. A debt ratio over 1.0 indicates that the school's liabilities exceed its assets, which raises insolvency concerns. Booker T. Washington PCS's debt ratio has fluctuated over the past five fiscal years, peaking at 1.12 in FY2011 and even higher at 1.88 in FY2013. The FY2013 debt ratio increase was primarily a result of a \$200,000 short-term loan and increased account payables from the prior year.

Fiscal Period	2009	2010	2011	2012	2013
Debt Ratio	0.65	0.86	1.12	0.69	1.88

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<sup>93</sup> Debt ratio equals total liabilities divided by total assets.