



2018-19 Fifteen-Year Charter Renewal Report Two Rivers Public Charter School

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DC Public Charter School Board
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STAFF RECOMMENDATION AND BOARD VOTE¹

The District of Columbia Public Charter School Board (DC PCSB) staff has reviewed the renewal application² submitted by Two Rivers Public Charter School (Two Rivers PCS), as required by the School Reform Act (SRA) and concludes that the school has met its goals and student academic achievement expectations. Therefore, DC PCSB staff recommends that the DC PCSB Board approve Two Rivers PCS's renewal application and renew the school's charter for a second fifteen-year term.

Two Rivers PCS is a local education agency (LEA) that educates students in grades prekindergarten-3 (PK3) through eight at two separate campuses, Two Rivers PCS – Young and Two Rivers PCS – 4th Street. The LEA's 4th Street campus offers grades PK3-8 in Ward 6, and its Young campus offers grades PK3-4 in Ward 5. The Young campus will continue to grow each year by adding a new grade level until it reaches maturation serving grades PK3-8 in school year (SY) 2022-23. The LEA intends to operate a single 6-8 middle school at the Young campus beginning in SY 2020-21.

The school elected to adopt the Performance Management Framework (PMF) as its goals and student academic achievement expectations, along with one mission-specific goal regarding the school's implementation of its Expeditionary Learning program. The PMF uses common measures across schools serving similar grades to measure school quality. The PMF measures student academic progress in English language arts (ELA) and math, student academic achievement in ELA and math, attendance, re-enrollment rates, and early childhood classroom observations. By adopting the PMF as its charter goals, Two Rivers PCS agreed to separate PMF goals for its two campuses.

In order for Two Rivers PCS – 4th Street to meet its PMF goals, the school had to earn at least 55% of the possible PMF points in two of the following three years: SY 2015-16, 2016-17, and 2017-18; and not score below 45% in more than one of the following years: SY 2013-14, 2015-16, 2016-17, and 2017-18. Additionally, in SY 2013-14 this campus needed to meet or exceed the PMF floor for all Early Childhood (EC) measures.

¹ Copies of the appendices referenced in this report may be found here: <https://dcpcsb.egnyte.com/dl/69TXokXhUK>.

² See Two Rivers PCS Charter renewal application at Appendix A.

The PMF results at Two Rivers PCS – 4th Street are as follows:

Two Rivers PCS 4th Street – PMF Outcomes					
School Year	2013-14	2014-15	2015-16	2016-17	2017-18
Tier Score	Tier 1 67.6% Met 10 out of 10 EC Measures	N/A ³	Tier 1 73.7%	Tier 1 70.4%	Tier 1 72.0%

Two Rivers PCS – 4th Street met all of its EC targets in SY 2013-14, and the school has maintained Tier 1 status each year of the review period, with a PMF score well over the required 55% every year a score was given. Further, this campus has had generally strong academic results with students outperforming the state average in ELA and math for both academic proficiency and growth.

Pursuant to the LEA’s charter agreement, Two Rivers PCS – Young needed to earn at least 45% of the possible PMF points in SY 2016-17 and SY 2017-18 to meet its PMF goal. While the school met its goal each year, this campus’s PMF scores have fluctuated since its first year of operation in SY 2015-16. Some of this fluctuation can be explained by the school growing by grade level each year.

The PMF results for Two Rivers PCS – Young are as follows:

Two Rivers PCS Young – PMF Outcomes			
Year	2015-16	2016-17	2017-18
Grades Offered	PK3 - 1	PK3- 2	PK3-3
Tier Score	No Tier ⁴ 47.2%	Tier 1 73.6%	Tier 2 51.4%

SY 2017-18 was the first year the school served third graders, which is the beginning year for the PARCC assessment and the first year this assessment is factored into the school’s PMF score. As shown in the table above, the Young campus declined by 22.2 percentage points on the PMF between SY 2016-17 and SY 2017-18. This drop was due to below-average student proficiency rates of the third-graders taking the PARCC, as well as low growth on the Northwest Education Association Measures of Academic Progress (NWEA MAP) assessment administered to students in K-2. Other PMF components were stronger, notably re-enrollment and in-seat attendance.

³ Due to the change in the state assessment, scores and tiers were not displayed in SY 2014–15.

⁴ Schools are not awarded a PMF score or Tier in the first year of operation. Data have been reported on all measures where available.

Finally, both campuses had the mission-specific goal to meet or exceed the school's yearly target score for the Expeditionary Learning (EL Education) Implementation Review. The LEA met its mission-specific goal every year of the review period for both campuses. As explained in the school's Charter Renewal Application, Two Rivers PCS not only exceeded its targets every year but has been named a Mentor School by EL Education since 2016, due to consistently outperforming on state tests and demonstrated student learning.⁵

One key strength of Two Rivers PCS is how well its students with disabilities perform academically compared to their peers in general education. Each of the LEA's campuses has a special education population of roughly 20% students with disabilities. At the 4th Street campus, students with disabilities have higher proficiency rates than the state average for both students scoring college and career ready (4+) and approaching college and career ready (3+) in English language arts (ELA) and math, for every year of the review period. Most notably, the school's students with disabilities often outperformed the state average by more than double.

Separate and apart from the determination of the school's goals and student academic achievement expectations, DC PCSB staff has determined that the school has not committed a material violation of the law or of its charter, has adhered to generally accepted accounting principles (GAAP), has not engaged in a pattern of fiscal mismanagement, and is economically viable.

Based on these findings, DC PCSB staff recommended that the Board vote to approve the school's charter renewal application. On January 28, 2019 the Board voted 7-0 to renew the charter of Two Rivers PCS for a second fifteen-year term.

⁵ See Appendix A.

CHARTER RENEWAL STANDARD

The standard for charter renewal is established in the SRA: DC PCSB shall approve a school's renewal application, except that DC 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.⁶

Separate and apart from the renewal process, DC PCSB is required by the SRA to revoke a school's charter if DC PCSB determines that the school (1) has engaged in a pattern of non-adherence to GAAP; (2) has engaged in a pattern of fiscal mismanagement; and/or (3) is no longer economically viable.⁷

Given the SRA's standard for charter renewal, as well as DC PCSB's obligation to revoke a school's charter if it has engaged in the above 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 DC PCSB staff's renewal recommendation. Section Three is an analysis of the school's fiscal performance.

⁶ D.C. Code § 38-1802.12(c).

⁷ D.C. Code § 38-1802.13(b).

BACKGROUND INFORMATION ABOUT SCHOOL

School Overview

Two Rivers PCS began operation in 2004 under authorization from DC PCSB to educate students in grades PK3-3.⁸ The school then grew by one grade each year and now offers grades PK3-8. The LEA's original campus, Two Rivers PCS–4th Street, is in Ward 6 and offers grades PK3-8. Since SY 2015-16, the LEA has also operated a second campus, Two Rivers PCS–Young in Ward 5, which educates students in grades PK3-4 and is growing by one grade each year until it reaches maturation with grades PK3-8, as approved by DC PCSB in June 2014.⁹

The school's mission is:

To nurture a diverse group of students to become lifelong, active participants in their own education, develop a sense of self and community, and become responsible and compassionate members of society.

The school uses the EL Education model, which includes learning expeditions where students engage in interactive, hands-on projects, often outside of the classroom. For example, students who studied the Jamestown colony also took a trip to see the original colony location in Virginia. These learning expeditions involve students in original research, critical thinking and problem solving, and culminate in student presentations at a community showcase that occurs twice a year. The school has been deemed “successful” in carrying out this model by the EL Education nonprofit that developed the model, and Two Rivers PCS has been named a “Mentor” school since 2016 for its strength in implementation of EL Education. The school also implements Responsive Classroom to emphasize social skills development for students. Two Rivers PCS also places a heavy emphasis on parental engagement by maintaining relationships with parents through the Two Rivers Parent School Association (PSA). 90% of families attend the school's showcase of student projects, which happens twice every year.¹⁰ The LEA collaborates with After-School All-Stars to provide middle school students with high-quality afterschool programming, including an eight-week filmmaking class, experiences with DJing and robotics, and a course in video game design.¹¹

⁸ Two Rivers PCS charter agreement, May 2004, Appendix B.

⁹ Two Rivers PCS Replication Amendment, Board Memo, June 2014, Appendix C; Third Amendment to the Charter Agreement between DC PCSB and Two Rivers PCS, Appendix D.

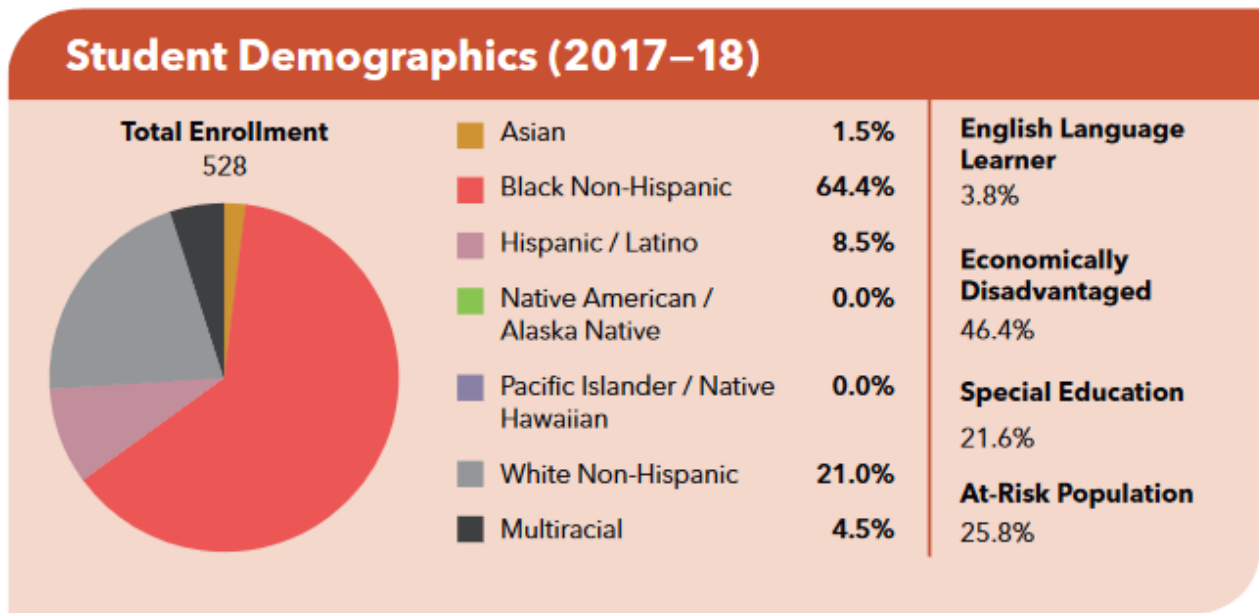
¹⁰ See Two Rivers PCS 2016-17 Annual Report, Appendix E.

¹¹ Two Rivers PCS website, <https://www.tworiverspcs.org/>.

Enrollment and Demographic Trends

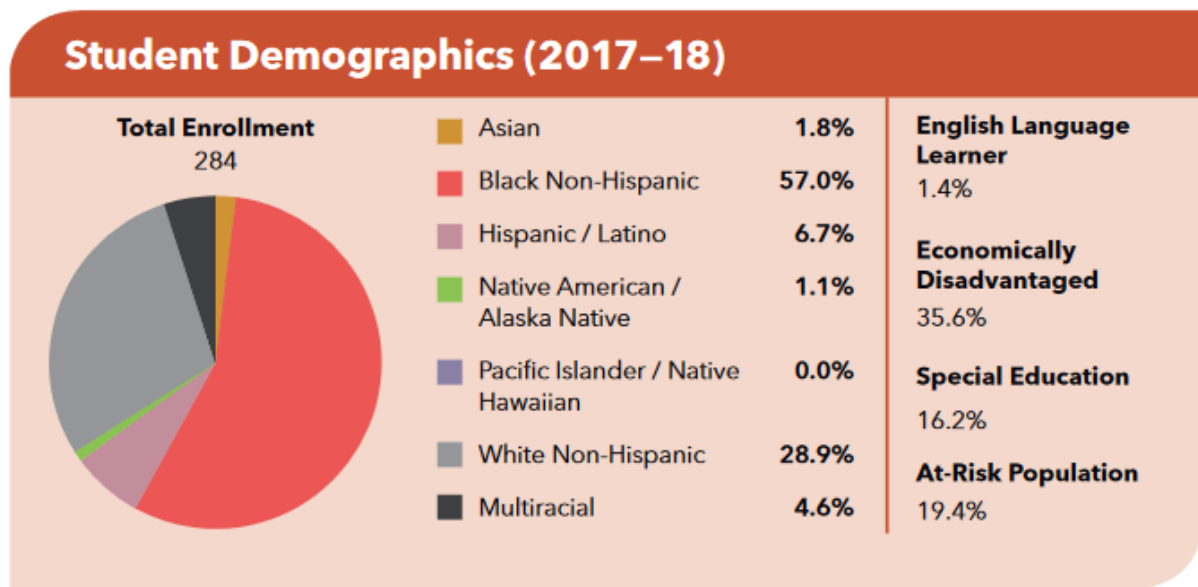
The tables below show the school’s enrollment and demographics at its two campuses. Both campuses have consistently been above or close to enrollment projections, as well as being among the most diverse in the charter sector. Both campuses serve around 20% students with disabilities.

Two Rivers PCS 4th Street – Enrollment					
School Year	2014-15	2015-16	2016-17	2017-18	2018-19
Grade Levels	PK3-8	PK3-8	PK3-8	PK3-8	PK3-8
Audited Enrollment	518	526	527	528	528 ¹²
Enrollment Projections	520	516	520	530	532



¹² This is as of an October enrollment count; this number is still unaudited.

Two Rivers PCS Young– Enrollment				
School Year	2015-16	2016-17	2017-18	2018-19
Grade Levels	PK3-1	PK3-2	PK3-3	PK3-4
Audited Enrollment	169	226	284	332 ¹³
Enrollment Projections	178	230	282	332



The tables below show the LEA’s grade-by-grade enrollment at each campus during the review period. The numbers in red indicate attrition, in which fewer students were enrolled than the previous grade level in the previous school year. Both the 4th Street and Young campuses showed minimal attrition, with a difference of no more than three students between grade levels each year.

Two Rivers PCS 4 th Street – Enrollment by Grade					
School Year	2014-15	2015-16	2016-17	2017-18	2018-19
PK3	36	36	36	36	36
PK4	45	47	46	48	45
K	50	50	50	50	49
1	50	50	51	50	50
2	50	50	50	50	50
3	50	50	51	50	50
4	50	50	51	50	49
5	50	49	50	50	50
6	48	50	50	47	50
7	48	48	48	50	50
8	41	46	44	47	47

¹³ This is as of an October enrollment count; this number is still unaudited.

Two Rivers PCS Young – Enrollment by Grade				
School Year	2015-16	2016-17	2017-18	2018-19
PK3	36	36	38	36
PK4	48	45	48	46
K	49	50	50	50
1	36	50	50	50
2		45	50	50
3			48	49
4				49

Communications with School

On April 4, 2018, DC PCSB staff met with school leaders at Two Rivers PCS to discuss its upcoming renewal. Staff provided the school with charts similar to the ones in the “PMF Outcomes” section, showing the LEA PMF performance for the past few years and explaining the targets each campus needed to meet to achieve its goals at the 15-year renewal. DC PCSB staff explained that Two Rivers PCS–4th Street had already demonstrated that it had met its goals due to its high PMF scores to date, and that the Young campus needed to earn at least a 45% in SY 2017-18 to meet its academic goal. The LEA was also informed of its mission-specific goal regarding Expeditionary Learning that each campus must meet for SY 2015-16 and beyond.

Prior Charter Reviews and Renewal

Five-Year Charter Review

In SY 2009-10, DC PCSB conducted a five-year charter review of Two Rivers PCS.¹⁴ The school was found to have met two of three academic performance standards and all non-academic performance standards. DC PCSB also found the school’s governance and finances to be strong. Based on this review, the DC PCSB Board voted in January 2010 to fully continue the school’s charter.

Ten-Year Charter Review

In SY 2013-14, DC PCSB conducted a ten-year review of Two Rivers PCS.¹⁵ DC PCSB found that the school was “very strong” academically and had met fourteen goals and academic expectations, substantially met one goal, and partially met one goal. Based on these findings, the DC PCSB Board voted to grant full continuance to the school.

¹⁴ Two Rivers PCS Five-Year Review Performance Analysis, Appendix F.

¹⁵ Two Rivers PCS Ten-Year Review Report, July 2014, Appendix G.

SECTION ONE: GOALS AND ACADEMIC ACHIEVEMENT EXPECTATIONS

The SRA requires DC PCSB to review whether a school has met its goals and academic achievement expectations at least once every five years. Goals and academic achievement expectations are considered part of the renewal analysis only if they were included in a school's charter or charter amendment approved by the DC PCSB Board.

In September 2016, Two Rivers PCS adopted the PMF as its goals and academic achievement expectations, along with one mission-specific goal.¹⁶ Two Rivers PCS currently operates two campuses with different minimum targets for student academic achievement expectations, consistent with the Elect to Adopt the PMF as Charter Goals Policy, and a mission-specific goal, as stated in the chart below

The chart also summarizes DC PCSB's determinations of whether the school's academic program met its respective goals and academic achievement expectations. These determinations are further detailed in the body of this report.

	Goals and Academic Expectations	Met?
	The School Corporation will be deemed to have met its goals and academic achievement expectations if, at its fifteen-year charter renewal in school year 2018-19:	
1	Two Rivers PCS – 4th Street has earned at least 55% of the possible PMF points in at least two of the following three years: SY 2015-16, 2016-17, and 2017-18; and not scored below 45% in more than one of the following years: SY 2013-14, 2015-16, 2016-17, and 2017-18; and has met the floor of all Early Childhood measures in SY 2013-14.	Met
2	Two Rivers PCS – Young has earned at least 45% of the possible PMF points in SY 2016-17 and SY 2017-18.	Met
3	Each Two Rivers PCS campus will meet or exceed its yearly target score, set and uploaded to Epicenter by July 1 of the previous school year, for the Expeditionary Learning Implementation Review.	Met

¹⁶ Two Rivers PCS Approved Board Proposal to Adopt the PMF, Appendix H.

- Two Rivers PCS–4th Street must earn at least 55% of the possible PMF points in at least two of the following three years: SY 2015-16, 2016-17, and 2017-18; and not score below 45% in more than one of the following years: SY 2013-14, 2015-16, 2016-17, and 2017-18; and meet the floor of all Early Childhood measures in SY 2013-14.**

Assessment: **Two Rivers PCS met this goal.** Two Rivers PCS – 4th Street has consistently been a Tier 1 school, earning above 55% of the total possible points during the entirety of the review period and never dropping below 45%. For three consecutive years, the school has earned a score above 70% on the PMF. The school also met the floor of all Early Childhood measures in SY 2013-14.

Two Rivers PCS – PMF Outcomes					
Campus	2013-14	2014-15	2015-16	2016-17	2017-18
Two Rivers – 4th Street	Tier 1 67.6% Met 10 out of 10 EC Measures	N/A¹⁷	Tier 1 73.7%	Tier 1 70.4%	Tier 1 72.0%
Two Rivers – Young			N/A¹⁸ 47.2%	Tier 1 73.6%	Tier 2 51.4%

- Two Rivers PCS – Young must earn at least 45% of the possible PMF points in SY 2016-17 and SY 2017-18.**

Assessment: **Two Rivers PCS met this goal.** Two Rivers PCS – Young has earned above a 45% in every year of operation, scoring 73.6% and 51.4% on the PMF in SY 2016-17 and SY 2017-18, respectively. The school did not fall below 45% of the possible PMF points, meeting this target every year since it opened.

- Each Two Rivers PCS campus will meet or exceed its yearly target score, set and uploaded to Epicenter by July 1 of the previous school year, for the Expeditionary Learning Implementation Review.**

Assessment: **Two Rivers PCS met this goal.** This review measures the school’s implementation of EL Education, a project and experience-based education model which is designed and assessed by the EL Education organization. The school has exceeded its review targets for both campuses every year and is considered to have strong implementation of this model by EL Education.

¹⁷ Due to the change in the state assessment, scores and tiers were not displayed in SY 2014–15.

¹⁸ This was the first year of operation for the campus, and it did not receive a tier.

Campus	2015-16		2016-17		2017-18	
	Score	Target	Score	Target	Score	Target
4 th Street	106	98	109	98	102	98
Young	104	57	102	66	99	84

Student Academic Achievement and Progress Measures

Both Two Rivers PCS–4th Street and Two Rivers PCS–Young are measured using the PK-8 PMF framework. Each campus’s PMF scores are based on the following:

Two Rivers PCS – 4th Street

- Proficiency rates in ELA and math on the statewide assessment (the PARCC test) taken by 3rd through 8th graders.
- Academic growth from one year to the next on the PARCC as measured by the Median Growth Percentile (MGP),¹⁹ which assesses the relative year-to-year progress made by individual students at a school. The MGPs included in this review are a two-year weighted average as displayed on the PMF.
- School environment measures, including attendance rates, re-enrollment rates, and scores from the Classroom Assessment Scoring System (CLASS), which assesses classroom instruction in pre-kindergarten.
- For SY 2013-14, the following measures count toward goal attainment for the 4th Street Campus’s early childhood program:
 - PK CLASS Scores in the Emotional Support, Organization and Instructional Support Domains: The school must meet or exceed the threshold for the CLASS score in each domain that is scored by an external vendor.
 - PK Literacy Brigance Developmental Assessment II/III: The percent of PK3-PK4 students achieving a proficient score must meet or exceed the threshold for the Brigance Developmental Assessment II/III literacy assessment.
 - PK Math Brigance Developmental Assessment II/III: The percent of PK3-PK4 students achieving a proficient score must meet or exceed the threshold for the Brigance Developmental Assessment II/III math assessment.
 - Kindergarten (K) Literacy mCLASS Circle Assessment: The percent of K students achieving a proficient score must meet or exceed the threshold for the mClass Circle literacy assessment.
 - Kindergarten Math mCLASS Circle Assessment: The percent of K students must meet or exceed the threshold for the mClass Circle math assessment.
 - Grades 1-2 Literacy NWEA MAP Assessment: The percent of 1-2 students must meet or exceed the threshold for the NWEA MAP literacy assessment.

¹⁹ An MGP of 50 indicates that a school’s students have average year-to-year growth in a subject, as compared to other DC students in the same grades and with the same initial state assessment performance. An MGP above 50 indicates that the school’s students have above-average year-to-year growth, while an MGP below 50 indicates below-average growth.

- Grades 1-2 Math NWEA MAP Assessment: The percent of 1-2 students must meet or exceed the threshold for the NWEA MAP math assessment.

Two Rivers PCS – Young

- SY 2016-17
 - Academic growth from one year to the next using NWEA MAP as measured by the median growth percentile as compared to national performance which assesses the relative year-to-year progress made by individual students at a school.
 - School environment measures, including attendance rates, re-enrollment rates, and scores from CLASS, which assesses classroom instruction in pre-kindergarten.
- SY 2017-18
 - Proficiency rates in ELA and math on the statewide assessment (the PARCC test) taken by 3rd graders.
 - Academic growth from one year to the next using the NWEA MAP as measured by the median growth percentile as compared to national performance which assesses the relative year-to-year progress made by individual students at a school.
 - School environment measures, including attendance rates, re-enrollment rates, and scores from CLASS, which assesses classroom instruction in pre-kindergarten.

The proficiency tables below display PARCC proficiency and growth results overall and across subgroups, as well as charts of the school’s environment measures. Many charts are color coded. Please use the following key:

KEY for Campus Rate Data Charts	
3+	<ul style="list-style-type: none"> ▪ A PARCC score of 3 = Approaching College and Career Ready ▪ 3+ denotes the percentage of students who obtained a 3, 4, or 5 on the PARCC
4+	<ul style="list-style-type: none"> ▪ A PARCC score of 4 = College and Career Ready ▪ 4+ denotes the percentage of students who obtained a 4 or 5 on the PARCC ▪ 4+ is considered to be proficient
n-size	<ul style="list-style-type: none"> ▪ Number of students who took the state assessment at this school
Green	<ul style="list-style-type: none"> ▪ Greater than or equal to the state average or charter sector average of the same grade band ▪ Met the EC PMF floor in 2013-14
Red	<ul style="list-style-type: none"> ▪ Less than the state average or charter sector average of the same grade band ▪ Did not meet the EC PMF floor in 2013-14
No Shading	<ul style="list-style-type: none"> ▪ Data from 2014-15, when the state transitioned to PARCC and the school performed below the state average. (Note – as stated above, if the school did better than the state average, this is colored green.) ▪ PK – 2 “display only” data that does not factor into the PMF score or goal attainment.

English Language Arts (ELA)

Two Rivers PCS – 4th Street has shown strong results in ELA for both growth and proficiency during every year of the review period. There are few areas for concern outside of waning performance among At-Risk test-takers in the most recent two years. Two Rivers PCS – Young does not appear to be as strong in ELA as the 4th Street campus. However, the school has only been open three years and continues to grow, and the measurements used for each campus are different. The 4th Street campus uses PARCC and Median Growth Percentile derived from city-wide PARCC performance, while the Young campus uses national growth percentiles on NWEA MAP. NWEA MAP results for the Young campus have nearly met or exceeded the national average the past two years. Should this result translate to strong PARCC performance, the Young campus should be situated to improve its PMF performance in the years to come.

Two Rivers PCS – 4th Street ELA Proficiency and Growth

Two Rivers PCS – 4th Street's overall proficiency rates were well above the state average during every year of the review period, contributing to its strong performance on the PMF. In SY 2015-16 and SY 2016-17, the school outperformed the state among test-takers scoring approaching college and career ready and above (level 3+) by 19.1 and 15.6 percentage points, respectively. Notably, in nearly every year all subgroups have outperformed their subgroup peers' proficiency rates statewide. In addition to proficiency, the school has maintained above-average growth overall during every year of the review period. Growth has been remarkably consistent, with an average overall MGP of 54.3. However, the school should continue to monitor the performance of At-Risk test-takers. For SY 2016-17 and SY 2017-18, MGP scores for At-Risk students have been below 50, and the percent of At-Risk students scoring level 4+ on the state assessment is below the city average in both years. The percent of At-Risk test-takers scoring level 3+, though, is well above the city average for these years.

Two Rivers PCS – 4th Street ELA Proficiency Grades 3-8											
	2013-2014 DC CAS			2014-2015 PARCC		2015-2016 PARCC		2016-2017 PARCC		2017-2018 PARCC	
	School	State		School	State	School	State	School	State	School	State
All	67.6	50.5	% 3 +	65.1	48.2	70.9	51.8	70.2	54.6	67.4	57.6
			% 4 +	40.8	24.8	43.2	27.5	40.8	30.9	42.4	33.9
	281		denominator	284		292		289		288	
Black Non-Hispanic	58.1	44.0	% 3 +	56.4	40.6	62.9	44.7	62.1	47.1	58.6	50.1
			% 4 +	26.7	16.6	29.4	19.6	28.8	22.1	29.8	25.0
	198		denominator	195		194		198		198	
Hispanic / Latino	70.8	50.2	% 3 +	73.1	49.4	72.4	52.1	73.1	56.2	75.0	59.7
			% 4 +	53.8	21.4	44.8	25.3	46.2	29.3	50.0	33.2
	24		denominator	26		29		26		28	
White	100.0	93.5	% 3 +	89.3	91.7	95.0	90.9	94.5	93.3	96.0	93.8
			% 4 +	83.9	78.9	86.7	75.3	81.8	81.5	80.0	82.0
	56		denominator	56		60		55		50	
English Learner	45.5	38.4	% 3 +	45.5	34.6	41.7	38.4	N/A	42.6	N/A	44.6
			% 4 +	18.2	11.7	16.7	14.7		17.6		20.1
	11		denominator	11		12		n < 10		n < 10	
Students with Disabilities	40.5	21.0	% 3 +	34.7	13.3	40.0	17.4	55.9	19.0	39.7	18.1
			% 4 +	16.7	4.2	16.5	5.6	19.1	6.4	10.3	5.9
	79		denominator	72		85		68		68	
Male	62.9	44.8	% 3 +	58.9	41.9	64.5	45.0	59.7	47.5	54.9	50.2
			% 4 +	35.5	20.4	36.8	22.7	27.3	25.1	30.7	27.8
	143		denominator	141		155		154		153	
Female	72.5	56.2	% 3 +	71.3	54.6	78.1	58.7	82.2	61.8	81.5	65.0
			% 4 +	46.2	29.2	50.4	32.4	56.3	36.7	55.6	40.0
	138		denominator	143		137		135		135	
At-Risk			% 3 +			54.5	36.8	58.0	39.9	47.9	43.6
			% 4 +			20.8	13.4	14.5	16.0	16.4	18.8
			denominator			77		69		73	

Two Rivers PCS – 4th Street ELA MGP Grade 4-8					
	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018
All	54.6	55.0	55.5	53.3	53.3
Black Non-Hispanic	52.4	51.5	52.3	50.8	52.3
Hispanic / Latino	49.7	55.0	49.6	46.4	52.7
White	64.4	58.0	62.0	62.4	56.2
Students with Disabilities	55.0	57.0	47.6	46.6	56.2
Male	52.0	55.0	51.2	48.0	49.0
Female	56.1	55.0	57.5	55.5	53.9
At-Risk			53.0	45.4	40.6

Two Rivers PCS – Young ELA Proficiency and Growth

Two Rivers PCS – Young first opened in SY 2015-16 with PK3 through first graders and has added a grade per year. As a result, the school administered the PARCC for the first time in SY 2017-18, when it first expanded to third grade. While the school performed below the state average overall, the school’s population, which is majority black non-Hispanic,

performed slightly above the state average for those students testing level 3+, as did the school's students with disabilities and female students

A consistent growth measure across the school's three years of PMF scores is NWEA MAP growth. In SY 2016-17, the school showed slightly above-average growth but then dipped below the national median percentile of 50 in the following year. NWEA MAP was the sole academic measure for this campus's PMF score in SY 2016-17 (50% of total possible points), and thus a median percentile of 53 contributed to earning Tier 1 that school year.

Two Rivers PCS – Young ELA Proficiency Grade 3			
		2017-2018 PARCC	
		School	State
All	% 3 +	44.4	53.3
	% 4 +	20.0	30.8
	<i>denominator</i>	45	
Black Non-Hispanic	% 3 +	45.2	44.9
	% 4 +	21.4	22.6
	<i>denominator</i>	42	
Students with Disabilities	% 3 +	16.7	16.1
	% 4 +	0.0	5.5
	<i>denominator</i>	12	
Male	% 3 +	33.3	47.9
	% 4 +	18.5	25.7
	<i>denominator</i>	27	
Female	% 3 +	61.1	58.9
	% 4 +	22.2	36.2
	<i>denominator</i>	18	
At-Risk	% 3 +	29.4	38.7
	% 4 +	5.9	17.9
	<i>denominator</i>	17	

Two Rivers PCS – Young ELA Growth Grades 1-2		
Year	Measure	Rate
2015-16	NWEA MAP:	37.5
2016-17	Median percentile of student growth compared to national student performance	53.0
2017-18	Floor and Target: 30 to 70	49.5

Two Rivers PCS – 4th Street ELA PK and K-2 Student Outcomes

DC PCSB allows schools to choose the assessments for ELA that best fit the academic program and philosophy of the early childhood environment at the school. The scores on these assessments for PK3-2 are not formally included in this campus's PMF score, but are included in this report as indicators of student academic progress and achievement in

these grade bands and are included in the analysis when determining if the consistent improvement provision applies. The results displayed below reflect the percent of students who met or exceeded the test publisher’s expectations (or “display range”) for achievement at the end of the year.

The 4th Street campus scored above 95% in both SY 2013-14 and SY 2014-15 on the Brigance assessment for PK students and then, after a decline in performance in SY 2015-16, the school switched to mClass: Circle in SY 2016-17. Though performance has not been as high in the years following, the campus still continues to fall in the middle of the display range.

For K-2, the school uses two assessments, which receive a combined score: mClass for kindergarten and NWEA MAP for grades 1-2. While falling within the display range for K-2 literacy, the school has seen an overall decline in performance on these assessments. The school met the EC PMF floors on these measures in SY 2013-14.

Two Rivers PCS – 4th Street						
ELA PK and K-2 Student Outcomes						
PK Reading Student Outcomes				K-2 Reading Student Outcomes		
2013-14	Brigance: Percent of students who met or exceeded the publisher’s expectations for achievement at the end of the year	97.6		2013-14	NWEA MAP (Grades 1-2) and mClass Reading (kindergarten) Median percentile of student growth compared to national student performance on NWEA and percent of students who met or exceeded the publisher’s expectations for mCLASS Display Range: 50-80	88.9
2014-15		95.0		2014-15		83.8
2015-16		Display Range: 60 to 100	79.5			2015-16
2016-17	mClass: Circle Percent of students who met or exceeded the publisher’s expectations for achievement at the end of the year	70.1		2016-17		52.0
2017-18	Display Range: 60 to 100	79.0		2017-18		56.7

Two Rivers PCS – Young ELA PK and K Student Outcomes

As noted above, Two Rivers PCS – Young administered Brigance in its 2015-17 – its first year of operation - and switched to mCLASS: Circle beginning in SY 2016-17. The school has performed well on both Brigance and mClass: Circle among its PK students. Each year, the campus has fallen well within the display range, with the campus never scoring below a 92% on either PK literacy assessment.

Similarly, to the 4th Street campus, Young uses mCLASS Reading for kindergarten and NWEA MAP for grades 1-2. For kindergarten, the school’s performance on mCLASS Reading has declined each year. It also uses NWEA MAP, but this is currently a scored measure on the PMF and, therefore, analyzed above.

Two Rivers PCS – Young ELA PK and K-2 Student Outcomes					
PK Reading Student Outcomes			Kindergarten Reading Student Outcomes		
2015-16	Brigance: Percent of students who met or exceeded the publisher’s expectations for achievement at the end of the year Display Range: 60 to 100	92.5	2015-16	mClass Reading Percent of students who met or exceeded the publisher’s expectations for achievement at the end of the year Display Range: 60-100	84.4
2016-17	mClass: Circle Percent of students who met or exceeded the publisher’s expectations for achievement at the end of the year	92.4	2016-17		80.0
2017-18	 Display Range: 60 to 100	92.6	2017-18		64.0

Math

While Two Rivers PCS – 4th Street posts strong results in ELA, math is the school’s stronger subject overall. During every year the PARCC test has been administered, Two Rivers PCS – 4th Street has maintained an MGP above 60. Nearly every subgroup in every year of the review period has been above the sector average for test-takers scoring level 3+ and level 4+. Two Rivers PCS – Young, on the other hand, has been below the state average in math proficiency since opening. While the Young campus performed well on NWEA MAP in SY 2016-17, it declined 22.5 percentage points the following school year. In addition, Two Rivers PCS – Young’s first year of the PARCC assessment showed only one subgroup performing

above the sector average. Two Rivers PCS – Young should pay particular attention to improving its math results in the years to come.

Two Rivers PCS – 4th Street Math Proficiency and Growth

Similar to ELA, Two Rivers PCS – 4th Street performed well across all four years of the review period among test-takers scoring level 3+ and level 4+. With few exceptions, every subgroup has scored above the state average for both level 3+ and level 4+ in every year of the review. For the past three years of the review period, over 70% of students have scored approaching college and career ready and above (level 3+) in math. In addition to high proficiency rates, the school has posted high MGPs every year of the review period as well. With just two exceptions every subgroup has grown at an above-average rate compared to other students city-wide since SY 2014-15.

Two Rivers PCS – 4th Street Math Proficiency Grades 3-8											
	2013-2014 DC CAS			2014-2015 PARCC		2015-2016 PARCC		2016-2017 PARCC		2017-2018 PARCC	
	School	State		School	State	School	State	School	State	School	State
All	69.4	55.5	% 3 +	67.3	49.1	72.6	50.6	73.7	53.0	71.1	55.2
			% 4 +	34.2	23.4	39.4	26.7	39.8	28.3	40.4	30.7
	281		denominator	269		292		289		287	
Black Non-Hispanic	62.1	48.9	% 3 +	56.3	42.1	63.4	43.2	65.2	45.4	61.9	47.4
			% 4 +	19.1	16.6	25.8	19.3	26.8	20.0	25.4	22.2
	198		denominator	183		194		198		197	
Hispanic / Latino	66.7	59.3	% 3 +	79.2	52.1	75.9	54.2	80.8	56.0	85.7	58.7
			% 4 +	54.2	21.4	44.8	25.3	46.2	28.2	50.0	30.2
	24		denominator	24		29		26		28	
White	94.6	93.5	% 3 +	96.4	90.1	98.3	91.0	98.2	93.0	98.0	93.4
			% 4 +	72.7	70.5	80.0	74.6	78.2	76.7	90.0	79.6
	56		denominator	55		60		55		50	
English Learner	45.5	50.9	% 3 +	45.5	44.4	41.7	45.4	N/A	48.1	N/A	50.5
			% 4 +	18.2	16.9	16.7	21.3		23.2		23.0
	11		denominator	11		12		n < 10		n < 10	
Students with Disabilities	48.1	26.5	% 3 +	45.1	15.8	49.4	20.0	54.4	21.3	38.2	20.2
			% 4 +	16.9	4.3	17.6	7.1	20.6	7.6	11.8	7.1
	79		denominator	71		85		68		68	
Male	68.5	53.1	% 3 +	66.7	46.6	71.0	48.2	66.9	50.2	66.0	52.5
			% 4 +	32.6	22.6	36.1	25.4	35.7	26.9	33.3	29.3
	143		denominator	135		155		154		153	
Female	70.3	58.0	% 3 +	67.9	51.7	74.5	53.0	81.5	55.9	76.9	58.0
			% 4 +	35.8	24.2	43.1	28.1	44.4	29.7	48.5	32.2
	138		denominator	134		137		135		134	
At-Risk			% 3 +			55.8	36.9	52.2	38.9	51.4	41.3
			% 4 +			14.3	14.7	15.9	15.7	16.7	17.2
			denominator			77		69		72	

Two Rivers PCS – 4th Street Math MGP Grade 4-8					
	2013-2014	2014-2015	2015-2016	2016-2017	2017-2018
All	51.2	68.5	62.1	62.0	62.0
Black Non-Hispanic	49.7	60.0	57.7	59.2	57.8
Hispanic / Latino	42.3	77.0	61.9	62.0	64.0
White	65.8	77.0	74.5	73.9	71.0
Students with Disabilities	49.1	58.0	59.7	64.6	59.0
Male	50.7	66.0	62.0	63.2	58.8
Female	53.1	73.0	62.2	59.5	64.1
At-Risk			49.0	50.4	48.6

Two Rivers PCS – Young Math Proficiency and Growth

Two Rivers PCS – Young first opened in SY 2015-16 and did not begin educating third graders until SY 2017-18; thus, only one year of PARCC data is available for this campus. With the exception of students with disabilities, every subgroup among the campus' 45 third graders scored below citywide averages.

A consistent growth measure across the school's three years of PMF scores is NWEA MAP growth. Test-takers grew at a rate six percentage points above the national average in SY 2016-17 but dipped sharply in SY 2017-18 with a median growth percentile of 36 on the NWEA MAP math assessment, contributing to the school's decline in overall PMF performance.

Two Rivers PCS – Young Math Proficiency Grade 3			
		2017-2018 PARCC	
		School	State
All	% 3 +	48.9	64.4
	% 4 +	24.4	40.8
	<i>denominator</i>	45	
Black Non-Hispanic	% 3 +	50.0	57.2
	% 4 +	26.2	31.6
	<i>denominator</i>	42	
Students with Disabilities	% 3 +	16.7	29.5
	% 4 +	16.7	12.7
	<i>denominator</i>	12	
Male	% 3 +	44.4	62.4
	% 4 +	18.5	39.0
	<i>denominator</i>	27	
Female	% 3 +	55.6	66.5
	% 4 +	33.3	42.7
	<i>denominator</i>	18	
At-Risk	% 3 +	41.2	51.2
	% 4 +	11.8	25.6
	<i>denominator</i>	17	

Two Rivers PCS – Young Math Growth Grades 1-2		
Year	Measure	Rate
2015-16	NWEA MAP: Median percentile of student growth compared to national student performance	36.0
2016-17		58.5
2017-18	Display Range: 30 to 70	36.0

Two Rivers PCS – 4th Street Math PK and K-2 Student Outcomes

DC PCSB allows schools to choose the assessments for math that best fit the academic program and philosophy of the early childhood environment at the school. The scores on these assessments for PK3-2 are not formally included in this campus's PMF score, but are included in this report as indicators of student academic progress and achievement in these grade bands and are included in the analysis when determining if the consistent improvement provision applies. The results displayed below reflect the percent of students who met or exceeded the test publisher's expectations (or "display range") for achievement at the end of the year.

Similar to ELA, the Two Rivers PCS – 4th Street campus performed well on the Brigance and mClass circle assessments for PK students for the respective years those assessments were administered. In every year of the review period except SY 2015-16, 90% or more of students met the publisher's expectations for achievement. For math, the school also uses the combination of mCLASS Math for kindergarten and NWEA MAP for grades 1-2. The school earned its highest score on mCLASS Math and NWEA MAP in SY 2013-14, and the math scores on these assessments for the following years have decreased annually. The school met the EC PMF floors on these measures in SY 2013-14.

Two Rivers PCS – 4 th Street					
Math PK and K-2 Student Outcomes					
PK Math Student Outcomes			K-2 Math Student Outcomes		
2013-14	Brigance:	93.9		2013-14	79.2
2014-15	Percent of students who met or exceeded the publisher's expectations for achievement at the end of the year	98.8		2014-15	76.4
2015-16		89.2		2015-16	52.3
2016-17	mClass Circle:	94.8		2016-17	45.9
2017-18	Percent of students who met or exceeded the publisher's expectations for achievement at the end of the year	93.8		2017-18	45.6
	Display Range: 60 to 100			Display Range: 50-80	

Two Rivers PCS – Young Math PK and K-2 Student Outcomes

As noted above, DC PCSB allows schools to choose assessments for math that best fit the academic program and philosophy of the early childhood environment at the school.

Two Rivers PCS – Young has performed within the display range during every year of the review period on Brigance and then mClass Circle for PK students. The school performed particularly well on mClass circle in SY 2016-17 and SY 2017-18, when greater than 95% of students met expectations for achievement. However, scores for kindergartners on mCLASS: Math have been low each year for the newly opened school, falling below the display range two out of the three years. Students in grades 1-2 were assessed in math using NWEA MAP, which is included in the scored portion of the PMF and, therefore, analyzed above.

Two Rivers PCS – Young Math PK and K-2 Student Outcomes						
PK Math Student Outcomes			Kindergarten Math Student Outcomes			
2015-16	Brigance: Percent of students who met or exceeded the publisher's expectations for achievement at the end of the year Display Range: 60 to 100	82.5		2015-16	mCLASS: Math Percent of students who meet or exceeded the publisher's expectations for achievement at the end of the year Display Range: 60-100	51.1
2016-17	mClass Circle: Percent of students who met or exceeded the publisher's expectations for achievement at the end of the year Display Range: 60 to 100	98.7		2016-17		72.0
2017-18		95.3		2017-18		54.0

School Environment Measures

School environment measures—in-seat attendance, re-enrollment, and the Classroom Assessment Scoring System (CLASS) for pre-kindergarten—are designed to show the school's climate and parent satisfaction.

In-Seat Attendance

DC PCSB measures In-Seat Attendance (ISA), which is the percentage of students at school without regard to whether an absence is excused or unexcused. Both campuses had above-average attendance rates except SY 2016-17 when they dipped slightly below the charter sector average. The school met the EC PMF floors for this measure in SY 2013-14.

Two Rivers PCS Grades PK3 - 8 In-Seat Attendance										
	2013-14		2014-15		2015-16		2016-17		2017-18	
Campus	School	Charter Sector	School	Charter Sector	School	Charter Sector	School	Charter Sector	School	Charter Sector
4 th Street	95.3	93.2	93.7	93.2	93.6	92.8	92.9	93.1	93.2	92.8
Young	N/A				92.5	91.8	91.8	92.3	93.3	92.2

Two Rivers PCS – 4th Street SY 2013-14 EC PMF In-Seat Attendance		
	2013-14	
	School	PMF Floor
PK	95.1	80.0
K-2	95.4	82.0

Re-enrollment

A school's re-enrollment rate assesses family satisfaction with a school by measuring the rate at which students who are eligible return from one year's official enrollment audit to the next year's official enrollment audit.²⁰ Students who move out-of-state or have other situations that would prevent them from re-enrolling are excluded from this rate.

Two Rivers PCS has exceptionally high re-enrollment rates across both campuses. More than 90% of students choose to return each year, suggesting high satisfaction with the school and its offerings.

Two Rivers PCS Re-enrollment								
	2013-14 to 2014-15		2014-15 to 2015-16		2015-16 to 2016-17		2016-17 to 2017-18	
Campus	School	Charter Sector	School	Charter Sector	School	Charter Sector	School	Charter Sector
4 th Street	93.8	83.0	94.3	83.0	91.2	83.9	91.3	84.4
	452		459		452		460	
Young	N/A				91.0	82.5	92.9	84.1
					156		212	

Two Rivers PCS – 4th Street SY 2013-14 EC PMF Re-enrollment		
	2013-14	
	School	PMF Floor
K-2 Students	97.9	60.0

²⁰ The enrollment audit occurs in October of each school year.

CLASS Observations of Pre-K Classrooms²¹

The table below shows Two Rivers PCS’s CLASS performance at both the 4th Street and Young campuses. Two Rivers PCS – Young has had stronger CLASS scores overall than the 4th street campus. Young has consistently been above the charter sector average in nearly every domain, whereas the 4th Street campus has been below. Two Rivers PCS – 4th Street has, however, improved its performance across domains each year with the exception of instructional support where scores have been more inconsistent. Despite being below the sector average, the school exceeded all floors for the CLASS measures on the SY 2013-14 EC PMF. It should also be noted that these observations are at odds with the very strong teaching observed in DC PCSB’s Qualitative Site Reviews, described on the following page.

Two Rivers PCS – 4 th Street CLASS Performance Targets				Two Rivers PCS – Young CLASS Performance Targets					
Year	Domain	School	Charter Sector	Year	Domain	School	Charter Sector		
2013-14	Classroom Organization	4.3	5.2	2015-16	Classroom Organization	6.2	5.9		
2014-15		5.3	5.5			2016-17	6.1	5.8	
2015-16		5.6	5.9				2017-18	6.1	5.8
2016-17		5.5	5.8					2015-16	Emotional Support
2017-18		5.6	5.8			2016-17	6.1		
2013-14	Emotional Support	4.9	5.7	2017-18	6.2		6.0		
2014-15		5.7	5.9		2015-16		Instructional Support		
2015-16		5.8	6.0	2016-17		3.0			
2016-17		5.8	6.1			2017-18		2.9	3.2
2017-18		5.9	6.0	2013-14	Instructional Support		1.7	2.5	
2013-14	Instructional Support	2.8	2.8			2014-15	2.5	3.1	
2014-15		2.5	3.1				2016-17	2.1	3.0
2015-16		2.1	3.0			2017-18		3.2	3.2
2016-17		3.2	3.2						

²¹ All DC early childhood programs are assessed by independent reviewers using the CLASS tool, which focuses on classroom interactions that boost student learning. The CLASS tool measures Emotional Support, Classroom Organization, and Instructional Support on a scale from 1-7. The Emotional Support and Classroom Organization indicators have a floor of three and a target of six on the PMF. On a national level, pre-school programs score lower on the Instructional Support indicator. Accordingly, DC PCSB’s floor for this indicator is one with a target of four.

**Two Rivers PCS – 4th Street
CLASS PMF Performance
SY 2013-14 Only**

Year	Domain	School	PMF Floor
2013-14	Classroom Organization	4.3	3.0
2013-14	Emotional Support	4.9	3.0
2013-14	Instructional Support	1.7	1.0

Qualitative Site Reviews (QSRs)

DC PCSB conducts QSRs of charter schools to assess classroom environment and quality of instruction. In April and May of 2018, in anticipation of this charter renewal analysis, DC PCSB conducted a QSR at both Two Rivers PCS campuses.²² At Two Rivers PCS – Young, observers noted that instruction was engaging and rigorous, giving students opportunities to work collaboratively with teachers and peers. The QSR team saw a focus on character education and social-emotional needs as teachers facilitated conversations between students about how to kindly and respectfully resolve conflicts. At Two Rivers PCS – 4th Street, students had numerous opportunities to choose how they worked, what medium they worked through, and who they worked with. Teachers took special care to provide materials that engaged students at all levels. Students overwhelmingly participated in the lessons, and in many observations, students appeared eager to ask questions and explain content to their peers.

In QSRs, each observed classroom is assigned an Unsatisfactory, Basic, Proficient, or Distinguished rating in classroom environment²³ and instruction.²⁴ The following tables detail the percentage of classrooms at each campus that were rated proficient or distinguished in each domain.

	Domain 2: Classroom Environment	Domain 3: Instruction
Two Rivers PCS – Young	80%	82%
Average score for PK-8 schools that received a QSR in SY 2017-18	78%	70%

²² See Two Rivers PCS’s QSR reports, attached to this report as Appendix I.

²³ To assess classroom environment, DC PCSB observed whether teachers (a) create an environment of respect and rapport; (b) establish a culture for learning; (c) manage classroom procedures; and (d) manage student behavior.

²⁴ To assess instruction, DC PCSB observes how teachers (a) communicate with students; (b) use questioning/prompts and discussion techniques; (c) engage students in learning; and (d) use assessment in instruction.

	Domain 2: Classroom Environment	Domain 3: Instruction
Two Rivers PCS – 4 th Street	80%	74%
Average score for PK-8 schools that received a QSR in SY 2017-18	78%	70%

The scores for the school's 4th Street campus are down slightly from its 2014 QSR, when it scored 87% in Classroom Environment and 84% in Instruction. Of the 18 QSRs conducted by DC PCSB in SY 2017-18, both Two Rivers PCS campuses scored above average compared to other PK-8 schools that received a QSR that school year.

SECTION TWO: COMPLIANCE WITH CHARTER AND APPLICABLE LAWS

The SRA requires DC PCSB to determine at renewal whether a school has “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.”²⁵ The SRA contains a non-exhaustive list of applicable laws, which DC PCSB monitors in its annual compliance reviews. The below table discusses the school’s compliance for this review period.

Since SY 2013-14, Two Rivers PCS has been compliant with **ALL** the following applicable laws.

- Fair Enrollment Process
(D.C. Code § 38-1802.06)
- Notice and Due Process for Suspensions and Expulsions
(D.C. Code § 38-1802.06(g))
- Student Health and Safety
(D.C. Code §§ 38-1802.04(c)(4), 4-1321.02, 38-651)
- Equal Employment
(D.C. Code § 38-1802.04(c)(5))
- Insurance
(As required by the school’s charter)
- Facility Licenses
(D.C. Code § 47-2851.03(d); D.C. Mun. Regs., tit. 14, §§ 14-1401 *et seq.*)
- Proper Composition of Board of Trustees
(D.C. Code § 38-1802.05(a))
- Accreditation Status
(D.C. Code § 38-1802.02(16))

Procurement Contracts

D.C. Code § 38-1802.04(c)(1) requires DC charter schools to use 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 DC PCSB all bids received, the contractor selected, and the rationale for which contractor was selected. To ensure compliance with this law, DC PCSB requires schools to submit a data form to detail any qualifying procurement contract that the school has executed.

DC PCSB began implementing a new Procurement Contract Submission and Conflicting Interest Policy on July 1, 2018. The statistics below capture Two Rivers PCS’s submissions

²⁵ D.C. Code § 38.1802.12(c).

and corresponding compliance with the policy. The school has been substantially compliant with procurement submissions since July 1, 2018.

- Submissions **Rejected** since July 1, 2017: **0/37**
- Submissions **Received** since July 1, 2017: **37/37**

During the FY 2017 reconciliation process, DC PCSB found that that the school submitted three FY 2017 contracts late. A historical record of the school's procurement contract bidding submissions can be found here: <https://dcpcsb.egnyte.com/fl/7r9qSOlmbQ>.

Special Education Compliance

Charter schools are required to comply with all federal and local special education laws, including the Individuals with Disabilities Education Act²⁶ (IDEA) and Section 504 of the Rehabilitation Act of 1973.²⁷ The following section summarizes the Two Rivers PCS's special education compliance from SY 2013-14 to the present.

The D.C. Office of the State Superintendent of Education (OSSE) Special Education Compliance Reviews

OSSE monitors charter schools' special education compliance and publishes three primary types of reports detailing these findings: (1) Annual Determinations; (2) On-Site Monitoring; and (3) Special Conditions Reports. OSSE's findings regarding special education compliance are summarized below.

(1) Annual Determinations

As required by federal regulation, OSSE annually analyzes each LEA's compliance with special education compliance indicators, and it publishes these findings in an Annual Determination report.²⁸ Each year's report is based on compliance data collected from the prior federal fiscal year. For example, in SY 2017-18, OSSE published its 2015 Annual Determination reports (based on the school's 2015-16 performance).

Two Rivers PCS Annual Determination compliance performance is detailed in the table below.²⁹ The LEA has consistently met requirements in implementing the elements of Part B of IDEA.

²⁶ 20 U.S.C. §§ 1400 *et seq.* See 20 U.S.C. § 1413(a)(5).

²⁷ 29 U.S.C. § 794.

²⁸ As required by federal regulation 34 CFR § 300.600(c).

²⁹ See Annual Determination reports, attached to this report as Appendix J.

Year	Percent Compliant with Audited Special Education Federal Requirements	Determination Level ³⁰
2014	97%	Meets Requirements
2015	94%	Meets Requirements
2016	100%	Meets Requirements

(2) On-Site Monitoring Report

OSSE conducts an on-site assessment of an LEA’s special education compliance with student-level and LEA-level indicators in alignment with its coordinated Risk-Based Monitoring,³¹ and publishes its findings in an On-Site Monitoring Report. Annually, OSSE assigns a risk designation to each LEA based on several criteria, including its IDEA Part B performance,³² which OSSE uses to determine if an LEA will receive on-site monitoring.³³ LEAs are responsible for being 100% compliant with student-level indicators and LEA-level indicators on On-Site Monitoring Reports.³⁴

As of August 2018, OSSE had not conducted an On-Site Monitoring of the school in the last four school years.

(3) Special Conditions Reports

OSSE, pursuant to the special conditions imposed by OSEP on grant awards under IDEA Part B, reports to OSEP three times a year on statewide compliance with: initial evaluation timeliness,³⁵ reevaluation timeliness, and secondary transition requirements (for students at age 16 and up). Two Rivers PCS is evaluated in adhering to initial evaluation and reevaluation timeliness. The outcomes are detailed in the tables below. To date, Two Rivers PCS has no identified areas of noncompliance.

³⁰ IDEA requires OSSE, as the State educational agency (SEA), to make determinations annually about the performance of LEAs. OSSE is required to use the same categories that the United States Department of Education, Office of Special Education Programs (OSEP) uses for state determinations as outlined in Section 616(d) of IDEA. These categories are: Meets Requirements, Needs Assistance, Needs Intervention, and Needs Substantial Intervention.

³¹ See <https://osse.dc.gov/publication/risk-based-monitoring-guidance>.

³² Part B of IDEA applies to students ages 3-22.

³³ The type of monitoring an LEA will receive varies depending on its designation as a “high,” “medium,” or “low risk” sub-grantee. An on-site monitoring visit will occur for LEAs classified as “high” risk.

³⁴ If OSSE determined an LEA was less than 100% compliant with a student-level indicator that could not be corrected retroactively, OSSE would identify the point of noncompliance as an LEA-level violation and give the LEA 365 days to correct the finding.

³⁵ Starting with SY 2017-18, the District of Columbia is no longer under special conditions with OSEP for timeliness of initial evaluations. Moving forward, OSSE will only submit to OSEP special condition reporting on statewide adherence to reevaluation and secondary transition requirements. Initial evaluation data will still be periodically reviewed for compliance and included in Annual Performance Reports (APRs). For the purposes of this report, initial evaluation compliance is included since OSSE reported on this area in the past.

Special Conditions Reporting Period – April 2015 through March 2016			
	August Report (April 1 – June 30)	November Report (July 1 – September 30)	May Report (October 1 – March 31)
Initial Evaluation	N/A	N/A	Compliant
Reevaluation	N/A	N/A	Compliant

Special Conditions Reporting Period – April 2017 through March 2018			
	August Report (April 1 – June 30)	November Report (July 1 – September 30)	May Report (October 1 – March 31)
Initial Evaluation	N/A	N/A	N/A
Reevaluation	N/A	N/A	Compliant

Child Find Monitoring Report

“Child find” is a set of policies, procedures, and public awareness activities designed to locate, identify, and evaluate children who may require special education and related services. Each LEA must have policies and procedures in effect to ensure that child find takes place. As a result of the *D.L. v. District of Columbia*³⁶ special education litigation, in SY 2017-18 OSSE audited every LEA’s identification rate of enrolled students receiving special education services against the 8.5% enrollment target established in the case. OSSE also conducted desktop reviews of all LEA child find policies to ensure that they were compliant with the law and did not adversely affect identification rates.³⁷

As described in a letter to the LEA’s leader,³⁸ OSSE found that in SY 2017-18 Two Rivers PCS identified 17.8% of its students eligible for special education, which is above the 8.5% enrollment target. OSSE also reviewed Two Rivers PCS’s child policy, procedures, and practices, and it determined that they were compliant with IDEA and local law. No further action was required from the LEA at the time of the letter.

Disproportionate Representation Finding

OSSE annually reviews LEAs for inappropriate over identification or disproportionate representation by race and ethnicity of children as children with disabilities. This review is based on the current school year’s enrollment audit and child count data. Only LEAs with an enrollment of 40 or more students with individualized education programs (IEPs) and five or more students with IEPs in the qualifying (racial/ethnic) subgroup undergo the disproportionate representation data review. For those LEAs found to have disproportionate representation, OSSE requires the LEA to complete and submit a self-study to review its own policies and practices related to child find, evaluation, and eligibility.

³⁶ *D.L. v. The District of Columbia* (Case No. 1:05-cv-01437), 860 F.3d 713 (DC Cir. 2017)

³⁷ For more information, see OSSE’s “Dear Colleague” letter on key IDEA requirements related to *D.L. v. District of Columbia* at <https://osse.dc.gov/publication/dear-colleague-letter-key-idea-requirements-related-dl-v-district-columbia>.

³⁸ Please find the Child Find Focused Monitoring Report for Two Rivers PCS attached as Appendix K.

An LEA will be cited for non-compliance only if the disproportionate representation was found to be the result of inappropriate identification.

On May 2018,³⁹ Two Rivers PCS was notified that it was found to have disproportionate representation in the areas of:

- Overidentification in the Autism category for White students, and
- Overidentification in the Specific Learning Disability category for African American students.

OSSE requested in its notification letter to the school that the LEA complete and submit a self-study assessment. Upon review of the self-study, OSSE determined that the LEA does not have disproportionate representation data based on inappropriate identification.

Hearing Officer Determination (HOD) Implementation Review

OSSE manages and oversees compliance through the HOD Tracker (formerly called the Blackman Jones database) that tracks the timely implementation of actions required by HODs. As of November 2018, no HODs have been issued against Two Rivers PCS.⁴⁰

³⁹ See 2017-18 Disproportionate Representation Review Report for Two Rivers PCS as Appendix L.

⁴⁰ HODs are the written decision issued as a result of a due process complaint that resulted in a hearing. Most complaints are withdrawn for any number of reasons, including settlement. Not all outcomes are required to be tracked. For the purpose charter reviews and renewals, DC PCSB reports only on HODs that resulted in a finding of noncompliance against the LEA.

SECTION THREE: FISCAL MANAGEMENT AND ECONOMIC VIABILITY

Introduction

The SRA requires DC PCSB to revoke a school’s charter if DC PCSB determines that the school:

- Has engaged in a pattern of nonadherence to generally accepted accounting principles (GAAP);
- Has engaged in a pattern of fiscal mismanagement; and/or
- Is no longer economically viable.⁴¹

DC PCSB has assessed Two Rivers PCS’s financial performance by reviewing the previous five years of audited financials and DC PCSB’s Financial Analysis Review (FAR) reports, dating from FY 2013 through FY 2017. DC PCSB also reviewed the school’s audited financials for FY 2018 and incorporated this data when relevant. For the purpose of this report, DC PCSB used the FY 2017 FAR Report’s “meets expectation” ranges to compare the financial strength of individual measures. The ranges were established where the upper end of the range was the “target” for financial performance and the lower end was the “floor.” Schools performing at or above the established targets are determined to be in a strong financial position for the specific metric being assessed. When schools’ metrics fall below the established floors, they are further reviewed to determine whether this poses financial concerns. DC PCSB assesses the school’s financial condition holistically in order to determine whether operations are adequately managed, sustainable, and economically viable.

KEY for Fiscal Management and Economic Viability Charts	
No Shading	<ul style="list-style-type: none"> ▪ Within an average, financially healthy range based on the FAR and general finance principles.
Red	<ul style="list-style-type: none"> ▪ Falling within a range which is cause for concern based on the FAR and general finance principles. Though this does not necessarily show fiscal mismanagement on the part of the school, it indicates that this specific measure fell below the targets that DC PCSB considers financially sound.

Summary of Findings

Two Rivers PCS has demonstrated adequate fiscal performance. Its financial audits confirm the school has adhered to GAAP and has adequate internal controls. The school has not engaged in a pattern of fiscal mismanagement, and it is economically viable.

Overall, the school’s financial performance is healthy, with positive net assets of \$6.9M, sufficient liquidity, and appropriate debt leverage. Trends in enrollment have been positive, which reflect positively on the school’s ability to consistently retain and grow its enrollment numbers year-over-year.

⁴¹ See D.C. Code § 38-1802.13(b).

Financial Overview

Overall, the school has exhibited adequate financial performance. The following table provides an overview of Two Rivers PCS's financial information between FY 2013 and FY 2018. Two Rivers PCS has grown revenue through 2018, with audited financial results reflecting an approximately 97% increase in total revenues from 2013. Enrollment numbers for Two Rivers PCS have been trending positively since 2013 and are not a cause for concern relating to the school's long-term ability to attract and retain students.

Financial Highlights (\$ in 000s)						
	2013	2014	2015	2016	2017	2018
Maximum Enrollment ⁴²	750	750	750	1,071	1,146	1,146
Audited Enrollment	502	516	518	695	753	812
Total Revenue	\$8,680	\$9,895	\$11,419	\$14,570	\$14,695	\$17,129
Surplus/(Deficit) ⁴³	\$334	\$402	\$1,227	(\$514)	(\$350)	\$951
Unrestricted Cash Balances	\$4,245	\$4,138	\$6,420	\$5,620	\$2,545	\$3,572
Number of Days of Cash on Hand ⁴⁴	222	167	241	151	78	86
Net Asset Position ⁴⁵	\$5,261	\$5,663	\$6,890	\$6,375	\$6,025	\$6,976
Primary Reserve Ratio ⁴⁶	60%	57%	63%	36%	39%	43%

Fiscal Management

Based upon DC PCSB's assessment of the school's liquidity, debt burden, and cost management, the school has shown evidence of adequate fiscal management. Specifically, liquidity is sufficient; the school has no outstanding debt to service; costs are effectively managed; and the internal control environment appears to be strong. These areas are discussed further below.

Liquidity

Liquidity								
	Floor	Target	2013	2014	2015	2016	2017	2018
Current Ratio	0.7	1.0	2.0	4.7	4.1	1.2	3.5	3.5
Number of Days of Cash on Hand	15	45	17	222	167	241	151	87

Liquidity refers to the school's ability convert assets to cash in order to meet its immediate financial obligations, particularly in the short-term. DC PCSB measures liquidity by

⁴² Maximum Enrollment represents the largest possible number of students for which the school may receive public funding. It may be higher than the school's targeted or budgeted enrollment, but provides a good proxy for the school's enrollment expectations over time.

⁴³ Surplus / (Deficit) is total revenue minus total expenses.

⁴⁴ Number of Days of Cash on Hand equals unrestricted cash and cash equivalents divided by daily operating expenses (which equals annual operating expenses divided by 365 days). It is a measure of the school's ability to pay debts and claims as they come due.

⁴⁵ Net Asset Position equals total assets minus total liabilities.

⁴⁶ Primary Reserve Ratio equals total net assets, less intangible assets, divided by total annual expenses.

assessing two metrics—the Current Ratio⁴⁷ and Days of Cash on Hand⁴⁸—as well as considering the school’s solvency.

Current Ratio: The current ratio divides a school’s current assets by its current liabilities. “Current” means being available or coming due within the next year. The school’s current ratio has consistently been above the target of 1.0 for all years since 2013, meaning the school has sufficient means to meet obligations that will come due in the next year.

Days of Cash on Hand: This measure determines how many days of expenses a school can meet with the cash it has in the bank. Similar to the current ratio, this measure has consistently been above the target of 45 days for the last five years, indicating the school has maintained sufficient liquidity levels.

Solvency: The final measure of liquidity is solvency,⁴⁹ which considers the school’s overall ability to pay outstanding obligations, including amounts due to vendors, employees, and lenders if the school’s charter were to be revoked or non-renewed. DC PCSB reviewed Two Rivers PCS’s 2017 audited financial statements to determine the risk to third parties in the event of school closure. Should the DC PCSB Board vote to close Two Rivers PCS, staff expects that the school would be able to meet its operating obligations, including estimated closure costs, and the school would not have a shortfall in meeting obligations due to vendors and employees. Given the overall financial health of the school, Two Rivers PCS’s solvency is not an area of concern.

Debt Burden								
	Floor	Target	2013	2014	2015	2016	2017	2018
Debt Ratio	0.9	0.5	0.7	0.7	0.8	0.8	0.8	0.8
Debt Service Coverage Ratio	1.0	1.2	N/A – metric introduced in FY 2016			1.2	1.1	1.9

Debt Burden

Based on DC PCSB’s assessment, there are no current concerns related to Two Rivers PCS’s debt burden. DC PCSB reviews two ratios related to debt management – the debt ratio⁵⁰ and the debt service coverage ratio (DSC).⁵¹

⁴⁷ A school’s current ratio is its current assets divided by current liabilities.
⁴⁸ Days of Cash on Hand is the amount of unrestricted cash and cash equivalents divided by daily operating expenses, excluding depreciation & amortization.
⁴⁹ Except when the school owns a facility, solvency equals unrestricted cash plus receivables with a high probability of collection, minus liabilities and closure expenses.
⁵⁰ Debt Ratio equals the total liabilities divided by the total assets.
⁵¹ Debt Service Coverage (DSC) Ratio equals Earnings Before Interest, Depreciation, and Amortization divided by the sum of scheduled principal payments and interest paid (not including balloon payments).

Debt Ratio: While the school's debt ratio has remained at 0.8 since FY 2015, analysis of the school's financials shows that since 2013, the school's debt leverage has increased year-over-year. While continued increases could be problematic, the school has demonstrated the ability to manage and service its debt obligations.

Debt Service Coverage Ratio: The debt service coverage ratio compares a school's current year operating surplus with the interest and principal due on its debt. A high ratio implies sufficient resources were available for debt service, while a low ratio indicates a school's inability to service its debt. The school has consistently been above DC PCSB's floor for this metric, ending FY18 with a debt service coverage ratio of 1.9, above the target for this metric.

Cost Management

Components of Expenses (\$ in 000s)					
	2013	2014	2015	2016	2017
Salaries and Benefits	\$5,248	\$6,523	\$7,089	\$8,542	\$9,518
Direct Student Costs	\$884	\$978	\$1,087	\$1,871	\$1,768
Occupancy Expenses	\$1,662	\$1,204	\$1,154	\$2,443	\$2,871
General Expenses ⁵²	\$553	\$788	\$837	\$2,007	\$1,194

As a Percent of Expenses						
	2013	2014	2015	2016	2017	FY 2017 Sector Average
Salaries and Benefits	63%	69%	70%	57%	62%	62%
Direct Student Costs	11%	10%	11%	13%	12%	10%
Occupancy Expenses	20%	13%	11%	16%	19%	16%
General Expenses	7%	8%	8%	14%	8%	10%

The tables above provide an overview of the school's spending decisions over the past five years. It appears that Two Rivers PCS's expenses are in line with sector averages.

Internal Controls

At the highest level, internal controls are processes assuring achievement of an organization's objectives in operational effectiveness and efficiency, reliable financial reporting, and compliance with laws, regulations, and policies.

Audits of Two Rivers PCS establish that the school has adhered to GAAP. The school's auditors issued unmodified audit opinions for all years and there were no material

⁵² DC PCSB has worked with the Financial Oversight Task Force to revise definitions of cost categories, including combining Office Expenses and General Expenses beginning in FY 2016. Other category definitions have also changed over time.

weaknesses identified in internal controls over financial reporting. Additionally, no other findings were identified in internal control over compliance and going concern considerations determined that the school has been stable over time. Based on this assessment, Two Rivers PCS appears to have an adequate internal control environment.

Internal Controls					
	2013	2014	2015	2016	2017
Modified Statement Opinion. The auditor issues an opinion letter on the basic financial statements. An <i>unmodified</i> opinion means the auditor is satisfied professionally that the statements present fairly the financial position of the school and the results of operations. Should there be areas of doubt, the opinion may be <i>modified, adverse, or disclaimed</i> .	No	No	No	No	No
Material Weakness. A material weakness is a deficiency, or combination of deficiencies, in internal control over financial reporting, such that there is a reasonable possibility that a material misstatement of the school's financial statements will not be prevented, or detected and corrected in a timely manner.	No	No	No	No	No
Statement Non-Compliance. The auditor tests for compliance with certain provisions of laws, regulations, contracts, and grant agreements. Non-compliance could have a direct and material effect on the determination of financial statement amounts.	No	No	No	No	No
Modified Program Opinion (Uniform Guidance). When expenditures of federal funds are greater than \$750,000, the auditor performs an extended review and issues an opinion letter on compliance with the requirements of laws, regulations, contracts, and grants applicable to each of the school's major federal programs. A <i>modified opinion</i> indicates instances of non-compliance.	No	No	No	No	No
Program Material Weakness (Uniform Guidance). In planning and performing the audit of major federal programs, the auditor considers internal control over compliance with the requirements of applicable laws, regulations, contracts, and grants. A material weakness in internal control indicates that there is a reasonable possibility of material non-compliance with a requirement of a federal program that will not be prevented, or detected and corrected, on a timely basis.	No	No	No	No	No
Findings & Questioned Costs. The auditor discloses audit findings that are important enough to merit attention by those charged with governance, with documentation of corrective action plans noting the responsible party.	0	0	0	0	0
Unresolved Prior Year Findings. The auditor discloses prior year audit findings that have not been corrected.	No	No	No	No	No
Going-Concern Issue. The auditor indicates that the financial strength of the school is questioned.	No	No	No	No	No

Internal Controls					
	2013	2014	2015	2016	2017
Debt-Compliance Issue. The audit discloses that the school was not in compliance with certain debt covenants. A debt-compliance issue may prelude insolvency.	No	No	No	No	No

Economic Viability

Considering earnings, cash flows, reserves, and trends in both enrollment and revenue, DC PCSB staff has no concerns regarding Two Rivers PCS's long-term economic viability. Trends in enrollment have reflected positively on Two Rivers PCS, as the school has been able to consistently retain or grow its enrollment numbers. The school has generated operating surpluses for three of the past five years and reserve numbers have been sufficient to cover the deficits generated.

(\$ in 000s)	Floor	2013	2014	2015	2016	2017	2018
Surplus/(Deficit)	<0	\$334	\$402	\$1,227	(\$514)	(\$350)	\$951
Earnings before Depreciation and Amortization	<0	\$873	\$854	\$1,689	\$793	\$957	\$2,008

Earnings and Operating Cash Flow

One measure of economic viability is whether a school runs a surplus – put simply, whether revenues exceed expenditures. While healthy schools can occasionally run deficits, in most years they do not. Earnings before Depreciation and Amortization (EBDA) removes major non-cash items from the earnings calculation and is an indicator of whether the school has generated positive cash for the year.⁵³

Two Rivers PCS had positive EBDA for all years since 2013 and positive operating surpluses for three of the last five years, with 2018 reflecting positive results. The school has not consistently operated at deficit and net assets have been sufficient to cover these losses.

(\$ in 000s)	Floor	Target	2013	2014	2015	2016	2017	2018
Net Asset Position	\$ 0	N/A	\$5,261	\$5,663	\$6,890	\$6,375	\$6,025	\$6,976
Primary Reserve Ratio	0%	25 %	60%	57%	63%	36%	39%	43%

Net Asset Position

Net Asset Position measures a school's assets less its liabilities. DC PCSB would be concerned with net assets reserves below zero. Two Rivers PCS has maintained a positive net asset position for all years under review, with 33% overall growth since 2013, based on audited 2018 results.

⁵³ EBDA is the change in net assets plus depreciation and amortization.

Primary Reserve Ratio

The Primary Reserve Ratio divides net assets by a school's total expenses to measure net assets relative to the size of the school. The Primary Reserve ratio has grown from 25% in FY 2013 to 43% in 2018; this is adequate and above DC PCSB's 25% target for this ratio.

Enrollment and Revenue Trends

The final measures of economic viability are trends in enrollment and revenues. Enrollment trends provide information about a school's ability to attract students and receive DC and Federal funds for operations. Stable or increasing enrollment and revenue indicate that a school's is likely to remain financially stable, barring extraordinary circumstances.

Two Rivers PCS has experienced consistent enrollment above 500 students since 2013, with significant growth from 2016 to 2018. Overall trends in enrollment are positive, with growth of 62% from 2013 to 2018. This is a positive indicator of the school's ability to attract and retain students for long-term sustainability.

Enrollment over Time						
	2013	2014	2015	2016	2017	2018
Enrollment	502	516	518	695	753	812
Growth in Enrollment	11%	3%	0%	34%	8%	8%
Total Revenue	\$8,680	\$9,895	\$11,419	\$14,570	\$14,695	\$17,071
Growth in Revenues	8%	14%	15%	28%	1%	16%