

Attachment C

Testimony, Public Comment, Task Force Meeting Notes, PALC Meeting Notes (comments in their entirety are found [here](#).)

Source	Summary of Comment	DC PCSB Staff's Proposed Response
<p>-1/28 board meeting public testimony (11 people)</p> <p>-Scott Goldstein (EmpowerEd)</p> <p>-2/5 Task Force meeting comments</p> <p>-Rachel Cohen, local journalist</p>	<p>Open board meetings:</p> <p>-Public comment and testimony suggestions: DC charter schools should be subject to the Open Meetings Act.¹ One predominant argument is that school staff should have the opportunity to discuss major decisions with the school's board members (such as school closure) before those decisions are final.</p> <p>-School leaders responded that they are open to holding a certain number of open meetings, but do not support being made subject to the Open Meetings Act.</p>	<p>Recommendation partially accepted:</p> <p>Language has been added to the policy specifying that the charter school board of trustees meeting calendar must include "a notation of which meetings are open to the public, in full or in part."</p> <p>All public charter schools must create an Open Meetings Policy, approved by their governing board and posted on their website in their Student/ Family handbooks. This policy shall include the number of open meetings the school commits to holding per year and the process for announcing the meetings publicly. The policy's Guidance Document recommends schools hold at least one public meeting to address any proposed campus closure or expansion, location change, grade level change, or charter relinquishment.</p>
<p>-1/28 board meeting public testimony (10 people)</p> <p>-EmpowerEd (Scott Goldstein)</p> <p>-2/5 Task Force meeting comments</p>	<p>Freedom of Information Act (FOIA)</p> <p>-Public comment and testimony suggestions: DC charter schools should be subject to the DC FOIA²</p> <p>-School leaders responded that they do not support being subject to FOIA due, in part, to staff capacity and the cost of implementation, which would take resources from their academic programs</p>	<p>Recommendation not accepted</p> <p>DC PCSB does not support this largely because staff burden in answering FOIA requests may impede on schools' academic programs.</p> <p>As an independent government agency, DC PCSB is subject to FOIA, which means that the public may access all documents submitted to DC PCSB by schools. Items that are often requested from DC PCSB via FOIA</p>

¹ Open Meetings Act: <https://www.open-dc.gov/open-meetings-act>

² Freedom of Information Act: <https://dc.gov/page/freedom-information-act-foia>

Source	Summary of Comment	DC PCSB Staff's Proposed Response
-Rachel Cohen, local journalist		have been added to the policy and will be posted on school websites (e.g. school budgets, board meeting minutes).
<p>-1/28 board meeting public testimony (3 people)</p> <p>-EmpowerEd (Scott Goldstein)</p> <p>-2/5 Task Force meeting comments</p> <p>-Rachel Cohen, local journalist</p>	<p>Board meeting minutes</p> <p>-Public comment and testimony suggestions: DC charter schools should post board meeting minutes</p> <p>-Given that schools submit their board-approved board meeting minutes to DC PCSB quarterly, and DC PCSB provides them, when requested, through FOIA, school leaders accept posting approved board meeting minutes on their websites</p>	<p>Recommendation accepted</p> <p>Board-approved board minutes have been added to the policy.</p>
<p>-1/28 board meeting public testimony (4 people)</p> <p>-EmpowerEd (Scott Goldstein)</p> <p>-2/5 Task Force meeting comments</p> <p>-Rachel Cohen, local journalist</p>	<p>School budgets</p> <p>-Public comment and testimony suggestions: DC charter schools should post school budgets</p> <p>-Given schools provide budgets to DC PCSB annually and DC PCSB provides them, when requested, through FOIA, school leaders accept annual budgets being added to the policy.</p>	<p>Recommendation accepted</p> <p>School budgets have been added to the policy.</p> <p>A footnote clarifies that DC PCSB will work with schools, OSSE, and other stakeholders to develop a common chart of accounts that will be required for budget submissions beginning with the 2020-21 school year, given that the 2019-20 budgets are already in development.</p>
<p>-1/28 board meeting public testimony (3 people)</p> <p>-EmpowerEd (Scott Goldstein)</p> <p>-2/5 Task Force meeting comments</p>	<p>Teacher & administrator data</p> <p>-Public comment and testimony suggestions: DC charter schools should post teacher data, including: teacher retention, salary and benefits, demographics, years of experience, teacher pipeline to licensure, relationship between professional development and teacher attrition</p>	<p>Recommendation partially accepted</p> <p>In the "Transparency Hub" section of our website, DC PCSB commits to pointing out where teacher data is already publicly available. For example, teacher attrition and average/ minimum/ maximum salary information is found in each school's Annual Report, published on DC PCSB's Transparency Hub and on each school's website.</p>

Source	Summary of Comment	DC PCSB Staff's Proposed Response
	<p>-One public comment requests administrator salary be included in the policy</p> <p>-School leaders noted that much of the requested teacher data is already available publicly, as is pay of the top executives</p>	<p>Form 990s and salaries of the highest paid executives have both been added to the policy.</p>
<p>-1/28 board meeting public testimony (2 people)</p> <p>-EmpowerEd (Scott Goldstein)</p>	<p>Management company data and contracts</p> <p>-Testimony suggestion: the policy should include profit information on management companies and turnaround organizations, such as TenSquare</p> <p>-Public comment suggestion: the Procurement Contract Submission and Conflicting Interest Policy should apply to all contracts, even those below \$25K</p>	<p>Recommendation partially accepted</p> <p>So long as the contract with TenSquare exceeds \$25,000, DC PCSB will collect the executed contract which details the cost of the service. Further, the price of any contract a school enters into with a turnaround organization that is valued at \$25K or more will be published on DC PCSB's website and read into the record at a public board meeting.</p> <p>Schools must submit information on all contracts worth \$25K or more, or conflicting interest contracts worth \$1k or more, and must submit the actual contract for all contracts worth \$100K or more. The collection of contracts under \$25K would be extremely burdensome on LEAs.</p> <p>DC PCSB is considering revising its Procurement Contract Submission and Conflict of Interest Policy to require the submission of contracts for any contract worth \$25K or more. This is expected to be the topic of a public hearing at the board's March meeting.</p>
<p>-1/28 board meeting public testimony (1 person)</p>	<p>Whistle blower policies</p> <p>-Require all schools to create and publish Whistle Blower Policies</p>	<p>Recommendation accepted</p> <p>The employee handbook has been added to the policy and must include the school's whistleblower policy</p>

Source	Summary of Comment	DC PCSB Staff's Proposed Response
-1/28 board meeting public testimony (1 person)	Student enrollment rates	Recommendation not accepted Student enrollment and re-enrollment is found in other public reports such as OSSE's state report card and DC PCSB's School Quality Reports.
Parent Alumni Leadership Council (PALC)	Charter agreement goals	Recommendation partially accepted DC PCSB already publicly posts all schools' charter agreements, which include charter goals, on our website. In our new "Transparency Hub," we will more directly link to each school's goals.
-PALC -2/5 Task Force meeting comments	Philanthropy dollars -PALC members suggested including philanthropy dollars and how they are spent -School leaders believe this can be addressed by schools increasing communication to families. DC PCSB encourages schools to inform their school community how money is being spent.	Recommendation not accepted Philanthropy dollars received per school is already listed in DC PCSB's Financial Analysis Review. In addition, each school lists all donors and grantors who have contributed at least \$500 per year in its Annual Report, which is published on DC PCSB's website and the school's website. Given the fungibility of funds it is not meaningful to list how philanthropy dollars are spent.
-PALC -2/5 Task Force meeting comments -EmpowerEd (Scott Goldstein)	Staff and board contact information -PALC members suggested including contact information for the following: McKinney Vento – Homeless Coordinator, Special Education Coordinators, Departments Heads, and requested the inclusion of an Org chart -Schools responded in support of including certain staff members' point of contact information. Schools pushed back on including an Org chart due in part to how much it changes throughout the year.	Recommendation partially accepted Language below has been added to the policy requiring that the school publish the contact information for the following school staff: Title IX coordinator, McKinney-Vento Homeless coordinator; Special Education point of contact Names of all school board members, and contact information for, at minimum, the Chair and Vice Chair (a

Source	Summary of Comment	DC PCSB Staff's Proposed Response
	<p>-Public comment request to add Board of Trustee contact information</p> <p>-DC PCSB staff suggested adding board member names and contact information, noting that many families do not know who serves on their school's boards, nor how to contact them</p>	<p>general email address, e.g. Board@LEA.org, is acceptable)</p> <p>The Org chart and list of Department Heads was not included. Per school leaders' feedback, the Org chart may change frequently and varies school to school (some include names, others do not). While many schools do post staff work email addresses on their websites, including Department Heads, the policy will focus on contact information of people that stakeholders have traditionally had a difficult time finding, such as board members.</p>
<p>TenSquare (Jessica Mellen Enos)</p>	<p>Submission processes and clarifications</p> <p>-Suggestion to clarify the timeline for schools to post documents to their websites after submitting to DC PCSB</p> <p>-Suggestion to clarify the Early Warning process</p> <p>-Suggestion to define what a "material change" is (if schools make material changes to already posted documents)</p> <p>-Suggestion to clarify whether schools will be provided a template for the at-risk funding submission</p> <p>-Suggestion to clarify how schools with electronic enrollment forms submit those to DC PCSB and post them</p>	<p>Recommendations partially accepted</p> <p>The timeline will be solidified in the Annual Compliance Calendar which is publicly released in May.</p> <p>A footnote was added to the policy clarifying that the Early Warning is the first warning.</p> <p>Given the universe of "material change" is infinite, we have not officially defined it. However, a general rule of thumb is that any minor correction that does not have a great impact on school policy or student expectations is not material.</p> <p>Language was revised to note that a sample at-risk funding template will be provided for schools as a model.</p> <p>A footnote was added clarifying that schools using a dynamic electronic registration form (e.g. InfoSnap) may use screenshots of the documents.</p>

Source	Summary of Comment	DC PCSB Staff's Proposed Response
	<p>-Suggestion that DC PCSB should commit to holding an annual meeting to review all required documents</p> <p>-Suggestion that DC PCSB should commit to a time-framed process for updating the guidance document</p> <p>-Suggestion that DC PCSB staff should include the Epicenter point of contact on all Early Warnings and Out of Compliance emails</p> <p>-Suggestion that DC PCSB should provide separate guidance describing any and all federal/ state required documents and information schools must have on their websites (e.g. posting lead water findings)</p>	<p>DC PCSB will commit to having a meeting any year that the list of required documents changes, but not necessarily in years where there are no changes to the required list. The guidance document will be updated when the Annual Compliance Calendar is updated (generally May of each year).</p> <p>Language was added to the policy noting that notices will also be sent to the Epicenter submitter.</p> <p>DC PCSB will make the recommendation to a support organization that they provide this service (e.g. Friends of Choice in Urban Schools (FOCUS)).</p>

Testimony from DC PCSB's January public board meeting

On January 28, 2019, fifteen members of the public provided public testimony on the School Transparency Policy. A transcript of this board meeting can be found here: <https://dcpcsb.egnyte.com/dl/4leTdRPwlu> (testimonies found on pages 11-48). Below is the list of people who testified.

1. Laura Fuchs, teacher at DC Public Schools (DCPS) (testimony begins on page 12)
2. Christian Herr, teacher at Cesar Chavez PCS - Prep (Chavez Prep) (page 14)
3. David Koenig, teacher at Washington Latin PCS (page 16)
4. Jennie Tomlinson, teacher at Chavez Prep (page 20)
5. Mateo Samper, teacher at Chavez Prep (page 22)
6. Kate Reinertson, teacher at Chavez Prep (page 24)
7. Elizabeth Davis, President of the Washington Teacher's Union (page 26)
8. Kara Howard, former teacher at Chavez Prep (page 28)
9. Fritz Mulhauser, Co-chair of the Legal Committee of the DC Open Government Coalition (page 30)
10. Jennifer Sonkin, teacher at Chavez Prep (page 33)
11. Juliana McCormick, teacher at Chavez Prep (page 35)
12. Arthur Traynor, parent of a BASIS DC PCS student (page 37)
13. Scott Goldstein, Founder and CEO of Empower ED (page 39)

14. Mariah Green, Cesar Chavez PCS – Capitol Hill alumna (page 42)
15. Liz Koenig, charter school teacher and member of EmpowerEd's Teacher Council (page 45)

Below are key recommendations raised during testimony.

- 10 people suggested requiring charter schools to have open board meetings
- 9 people suggested requiring charter schools to be subject to FOIA
- 3 people suggested adding school budgets
- 3 people suggested adding teacher retention data
- 3 people suggested adding data on teacher salaries/ benefits
- 2 people suggested adding profit information on management companies or support organizations (e.g. TenSquare)
- 2 people suggested adding minutes from charter board meetings
- 1 person suggested adding whistle blower policies
- 1 person suggested adding school credit recovery policies
- 1 person suggested adding student enrollment rates
- 1 person stated the policy as written does not provide real transparency. It should be to shed light on the real workings of schools and boards.
- 1 person stated the information the policy requires to be publicly posted is not creating more transparency because it is already posted on DC PCSB's website

School Transparency Policy School Leader Task Force Meeting #2

On February 5, 2019, DC PCSB reconvened the Task Force, open to all public charter school leaders and support organizations, to discuss the policy's feedback. Twenty people representing 15 public charter schools and two charter support organizations met with DC PCSB staff and provided their thoughts on suggestions made via public comment and public testimony. Below is a summary of key discussion items.

- Schools and DC PCSB staff noted that the policy should specify that DC PCSB is adding additional documents that will be collected and posted, not just documents already posted on DC PCSB's website
- Open Meetings
 - Discussion that DCPS, as an agency, is subject to FOIA, but not the Open Meetings Act
 - Schools support increasing accessibility of the public to Boards by having some meetings open
 - Schools suggested the policy should require every school to create their own policy on open meetings that would list how many open meetings the school will have per year.
- FOIA
 - Schools are concerned about the logistical staff burden of FOIA taking away from energy and resources spent on academics
- Budgets

- Schools are open to publicly posting their annual board-approved budgets.
- It is too late in the year to require a common template, as budgets are already in progress; budgets are written 18 months out.
- Teacher data
 - Aggregated teacher salary information is already submitted to DC PCSB in the Annual Reports
 - Salary information is already listed on the 990s. Schools support adding the current 990s to the policy.
 - DC PCSB should more directly point to where teacher information is already publicly available (e.g., Title II Part A teacher equity plan)
 - We should delay adding items to the policy that are coming down the pike to be publicly available on the state report cards.
- At Risk funding—there was not consensus at the first task force meeting about including it. Consensus achieved at this meeting to include it.
- Board-approved board meeting minutes posted on website—schools support adding it to the Policy
- Names and contact info of board members--Schools support adding it
- Philanthropy dollars--Schools believe this is more of a fundraising communication issue
- Org chart and staff contacts
 - The problem with the org chart is that they change quickly, schools do not want to have to update it throughout the year
 - Schools are open to posting contact info for points of contact, such as McKinney Vento Homeless Coordinator, Title IX coordinator, grievance procedure point of contact, Special Education point of contact
- DC PCSB—we can improve communication by making it clearer where families can find information that already exists

Feedback from the Parent and Alumni Leadership Council (PALC)

On January 15, 2019, DC PCSB held a PALC meeting in which six members recommended the following documents to be included in the policy:

- School budgets
- Goals listed in a school's charter agreement
- Philanthropy dollars and how they are spent
- McKinney Vento - Homeless Coordinator
- Special Education Coordinators
- Organization Structure and Chart
- Department Heads
- Transportation Operations

Feedback provided in a meeting with EmpowerEd

On January 31, 2019, EmpowerEd Executive Director Scott Goldstein met with DC PCSB staff to provide more feedback on this policy from his organization's *Teacher*

Council, which is comprised of 35 people, half charter, half DCPS (one of whom also testified at the January board meeting).

Key recommendations:

- Charter schools should be required to hold open meetings
- Charter schools should be subject to FOIA

Secondary recommendations:

1. Teachers' years of experience at the school and years of experience teaching overall (something they have asked of DCPS too)
2. Teacher demographics—they request this to make sure there is equitable representation in the classroom. (DCPS does not provide this school by school, but they have it available at the LEA level.)
3. Salary information—They appreciate our Annual Report having the median, but they want to know it at a more granular level, for example each school's averages based on 1st year salary, 5th year salary, 10th year salary, etc. They realize not every school has a salary scale, but schools could calculate it this way.
 - They also request administrator pay (we noted this is in 990s published on our websites—but since the theme of the policy is for schools to post information on their websites, the group requests this be added)
4. Contact information of board members (if not the whole board, at least the chair and vice chair)
5. Teacher retention—it is in schools' Annual Reports but some schools are mixing up retention vs. attrition
6. Teacher pipeline—to determine what pipeline leads to retention (e.g. alternative licensure versus traditional university programs). They also want to know what percentages of school staff are certified.
7. Cost of professional development (PD) and the relationship to teacher attrition—their philosophy is the higher the attrition, the higher the PD. Ideally what they want is the cost of attrition (“how much did school spend this year on training new teachers?”)
8. Where student recruitment dollars are spent (e.g. wards, neighborhoods)
9. PTA budgets (or even *if* schools have a PTA)
10. At risk funding (noted that it is already in the policy)
11. Contracts below \$25K

He also urges DC PCSB to encourage schools to have teachers serve on charter school boards. Though this is not a transparency issue and the School Reform Act only mandates boards include parents, they believe it valuable in the same way it is valuable to require schools to have open meetings.

Date: Tuesday, January 22, 2019 at 11:36 AM

To: Public Comment <public.comment@dcpcsb.org>

Subject: Public Comment for draft School Transparency Policy

Good morning,

Please see below and attached TenSquare LLC's public comment on the Draft School Transparency Policy. The content of the email and attachment are the same; the attachment is on official letterhead, but is also included below for convenience.

Thank you,
Jessica

Thank you for the opportunity to comment on the Draft School Transparency Policy. I am submitting this comment on behalf of TenSquare, LLC. TenSquare works closely with many charter schools in the District and has been heavily involved in both OSSE and DC Public Charter School Board conversations about policy and documentation over the past few years.

We found that overall, the proposal is logical and does not suggest any additional burdens on schools. All of the items requested are already produced by schools, and many are already posted on the school website. Additionally, we appreciate the ability for schools to make non-material changes to the documents as they arise throughout the year.

Based on our review of the draft Policy and experience with schools, we have some questions to which we recommend DC PCSB provide clarification to ensure compliance:

1. The current draft Policy states "To be compliant with the School Transparency Policy, schools must submit each document listed above to the DC PCSB **for review** by the due date on DC PCSB's Annual Compliance Calendar...If the school wishes to make a material change to a publicly posted document after it has already been **approved** by DC PCSB, the school must notify DC PCSB via the Notifications email address" [emphasis added]. Additionally, the School Transparency Policy Guidance Document lists a timeline for submission, but does not indicate a timeline for posting to the school website. We recommend that PCSB clarify: DC PCSB's role in required document posting process; the timeline and relationship between submission to DC PCSB and posting to school website; and whether timely document posting or approval of document by the DC PCSB is paramount for compliance.
2. In the Process section, the draft Policy states "DC PCSB staff will check these links periodically, and if at any time a link is broken, or the document is found to no longer be posted, the school will be notified and required to remedy this issue within ten business days." In the Consequences section of the draft Policy, an official Early Warning is described as a consequence for

non-compliance with the Policy. Is this first notice from the Process section considered an Early Warning, or is this notice in advance of the Early Warning as described in the Consequences section? We recommend that PCSB clarify whether or not this initial notification is considered an Early Warning.

3. The draft Policy states “If the school wishes to make a material change to a publicly posted document after it has already been approved by DC PCSB, the school must notify DC PCSB.” We recommend that DC PCSB define or provide guidance about what constitutes a material change for the required documents cited in the Policy.
4. The School Transparency Policy Guidance Document states that for At-risk funding plans, “Schools must submit a description of project spending plans using at-risk funds for SY 2018-19. Schools should populate **the template provided (a sample will be provided)**” [emphasis added]. Is DC PCSB requiring schools to use a DC PCSB-provided template, or is DC PCSB providing samples for schools to consider in their reporting of projected at-risk spending? We recommend that DC PCSB clarify the language here to clarify what is expected of schools, and further, recommend a unified template for consistency of reporting across schools.
5. The draft Policy requires schools to post their Student Enrollment forms. The School Enrollment form in the School Transparency Policy Guidance Document, is defined as “A list of all required documentation or forms schools request of families for a student to enroll at the school after the student has already been accepted.” Is DC PCSB requiring a list of documents as stated in the Guidance Document, or is DC PCSB requiring an actual student enrollment form? Many schools use dynamic electronic registration forms (ex: InfoSnap), which can only be accessed by re-enrolling families or new families confirmed through the DC Lottery to ensure compliance with Lottery process. For these schools, providing the enrollment form would either require schools to create an additional document, or create confusion for families about how to appropriately apply and register for school. We recommend that DC PCSB provide additional guidance regarding enrollment form requirements, especially for InfoSnap schools or other electronic enrollment systems.

Additionally, we encourage DC PCSB to consider the following in finalizing the Policy:

1. The current draft Policy states “If DC PCSB anticipates updates to the list of items required to be posted, staff will commit to holding a meeting with school leaders to solicit feedback.” We would encourage DC PCSB instead to commit to holding an annual meeting, as discussed at the November 9 School Transparency Policy meeting, to review the required documents, templates and timelines, both to ensure a process of continuous improvement and to ensure schools are proactively informed about whether changes will or will not be made to the list of items annually.
2. The current draft Policy references the School Transparency Policy Guidance Document. We appreciate DC PCSB producing this document, as it clarifies many questions from the November 9 School Transparency Policy

meeting. We would encourage DC PCSB to commit to a time-framed process for the updating of this document to ensure schools have sufficient time between amendments to the Guidance Document and school submission deadlines to comply with any changes.

3. The draft Policy states that Early Warnings and Out of Compliance Notices resulting from non-compliance will go to the head of school. We would encourage DC PCSB to additionally include Epicenter Points of Contact on these communications to additionally support timely school compliance.
4. The draft Policy describes a subset of documents and information which schools are required to produce, submit, and post. We would encourage DC PCSB to add in, or provide separate guidance describing any and all required documents and information schools must have on their website. For example, schools have received requests to post lead water findings and Board member names, but these pieces of information are not included in the draft Policy. Clarifying all posting requirements would help schools with proactive compliance.

Thank you for the opportunity to provide public comments on the draft School Transparency Policy. If you have any questions, I would be happy to discuss further.

Respectfully,

Jessica Mellen Enos
Director of Performance
TenSquare, LLC

Date: Wednesday, February 6, 2019 at 1:21 PM

To: Public Comment <public.comment@dcpcsb.org>

Subject: Comment on proposed transparency reforms

Hi,

My name is Rachel Cohen, I'm a local journalist. I am writing to offer some feedback on the proposed transparency reforms, and to add my voice to those who have weighed in in favor of bringing charter schools under the same transparency requirements as other D.C. public schools.

1. I think individual charter schools should post their board meeting minutes on their schools' website, perhaps within 5-7 days following the event. While those documents can eventually be FOIA'd from the PCSB, it would be much easier and more transparent if that information was easily accessible to everyone, without having to go through the PCSB first, especially since that can take weeks, and sometimes months. I know I benefit very much from reviewing the materials the

PCSB posts online about their own board meetings, and if charter schools posted their meeting agendas and minutes to their own websites, too, I think that would be a real step forward for charter transparency.

2. I also believe D.C. charter schools should be subject to FOIA and the Open Meetings Act. This is the recommended practice of the National Alliance for Public Charter Schools (see [page 14 for citation](#)) and also the standard operating procedure across the country for most places with thriving charter school sectors.

I have compiled a brief, in-exhaustive list for your reference:

New York

(https://www.nyccharterschools.org/sites/default/files/resources/FOIL_FAQ_071813.pdf)

North Carolina

(<http://www.ncpublicschools.org/charterschools/information/topics?role=parents&&topic=Policy%20and%20Law>)

South Carolina

(<https://pcsasc.memberclicks.net/assets/BoardTraining/foiaslides10212013.pdf>)

Florida

(https://www.floridacharterschools.org/schools/law_and_compliance/)

Ohio

(<https://www.rcfp.org/court-charter-schools-must-comply-records-laws/>)

Connecticut

(https://www.cga.ct.gov/2017/pub/chap_164.htm#sec_10-66aa)

Texas

(<http://www.txcharterschools.org/wp-content/uploads/2017/06/Record-Requirements-and-Public-Information.pdf>)

Illinois

(https://www.incschools.org/wp-content/uploads/_mediavault/2015/05/Freedom-of-Information-Act-July-2010.pdf)

Colorado

(<http://www.cde.state.co.us/sites/default/files/documents/cdechart/guidebook/gov/pdf/openmtgsrecordsmemo.pdf>)

And last month the Attorney General of California [issued this opinion](#), finding that charter schools in their state should also be subject to open meetings and public records law.

While I understand there have been concerns in the past that D.C charter schools

might be overwhelmed and burdened by such transparency requirements, I think these fears, while understandable, are not justified, and in fact, most states manage this exact balance between public accountability and charter autonomy.

As a journalist, I can also offer that there are many questions that I've wanted to dig into that I could not do so because they pertained to matters that the PCSB did not collect directly from schools. If I had the ability to request records from the schools themselves, like most of my colleagues in the education journalism world can do in their respective cities, then I do believe my reporting would be strengthened for D.C. readers.

I thank the PCSB for extending the public comment period on this issue, and I look forward to seeing the next iteration of transparency reforms. If you have any questions for me, please don't hesitate to reach out.

Best,
Rachel

School Transparency Policy School Leader Task Force Meeting #1

On November 9, 2018, 23 people representing 18 public charter schools and three charter support organizations met with DC PCSB staff to provide feedback on a draft of DC PCSB's proposed School Transparency Policy which was slated to be opened for public comment in December. Below is a summary of the key discussion points.

- DC PCSB shared what the impetus of the policy was, noting an increase in public demand for school documents
- The group reviewed the list of documents DC PCSB proposed be included in the policy:
 - Charter board meeting calendar
 - High school course offering
 - School calendar
 - Student handbook
 - At-risk funding plans
 - Annual report
 - Title IX assurance
 - Lottery procedures (schools not participating in My School DC)
 - Student application (schools not participating in My School DC)
 - Student enrollment form

Group feedback

- Title IX Assurance—discussion of whether this requirement should change to “Title IX Coordinator Contact Information”
- Student enrollment forms—discussion of how this requirement would impact schools that use electronic enrollment systems

- Schools requested they be allowed to weigh in if the list of required documents changes in future years.
- Schools suggest there be a *Guidance Document* added to the policy to provide clarity on the content of what needed to be posted for each item.
- Schools had questions about the timeline of posting to Epicenter first then getting approval to post to their websites.
- Fixing broken links—schools say ten business days is more realistic than five
- At-risk funding—Schools expressed concern over the varying amounts of information schools submit (some submit very specific dollar amounts, others submit a narrative of general spending)