



2019-20 Preliminary Five-Year Charter Review Report The Children's Guild District of Columbia Public Charter School

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STAFF RECOMMENDATION AND KEY FINDINGS¹

The District of Columbia Public Charter School Board (DC PCSB) staff has conducted a charter review of The Children's Guild District of Columbia Public Charter School (Children's Guild PCS), as required by the School Reform Act (SRA),² and concludes that the school has not met its goals and student academic achievement expectations (charter goals) as specified in its charter agreement. However, staff recommends that the Board use its discretion to continue the charter with conditions for the reasons outlined in this report.

Children's Guild PCS is a local educational agency (LEA) that currently educates 331 students in grades K-8 at a single campus in Ward 5.

Based on its mission and student population, Children's Guild PCS is eligible for the Alternative Accountability Framework (AAF). DC PCSB designed the AAF for schools that strive to provide alternative programs to serve students facing numerous obstacles to academic success. For a school to be eligible for the AAF, at least sixty percent of its student population must qualify for at least one risk factor.³ The AAF requires the school to create mission-specific goals that measure, at minimum, student achievement and student growth in English language arts (ELA) and math, as well as student engagement. As such, Children's Guild PCS has three unique goals: one goal captures all the school's academic achievement expectations and attendance, while the remaining two goals capture school environment using measures of discipline, student engagement, and parent engagement.

Of its three goals, the school partially met two and did not meet one, which is not a sufficient level of goal attainment to be considered to have met its charter goals.

The goal that Children's Guild PCS did not meet includes many measures of student academic growth and achievement in ELA and math. It also includes a measure on attendance. The school primarily failed to meet the academic goal because its students have performed below the state average for similar students on the Partnership for Assessment of Readiness for College and Careers (PARCC) state assessment for most years of the review period in both ELA and math.

¹ You may view copies of all the appendices in this report here: <https://dcpcsb.egnyte.com/fl/uju5N8fwcO>.

² D.C. Code § 38-1802.12(a)(3).

³ AAF risk factors include if a student 1) is receiving level 3 or level 4 special education services, 2) is pregnant or mothering, 3) is at least two years over-aged or under-credited for their grade level, 4) is homeless, 5) has been involved in the criminal or juvenile justice system, 6) has been expelled, 7) has been involved in the child abuse and neglect system, 8) has a parent who is detained in a correctional facility or who is currently incarcerated, or 9) has been hospitalized due to a psychiatric condition. See the [2018-19 PMF Policy and Technical Guide](https://dcpcsb.org/2018-19-pmf-policy-and-technical-guide) for full eligibility criteria: <https://dcpcsb.org/2018-19-pmf-policy-and-technical-guide>.

Children's Guild PCS partially met two of its charter goals. The first was a goal around maintaining a safe and supportive school environment, as measured by Gallup student polling and school discipline rates. The school only partially met this goal as its suspension rates have often been above the sector average, though they have dropped considerably over the review period and students have reported satisfaction on the Gallup polling. The second goal the school partially met was regarding parent satisfaction as measured by a parent survey. The school partially met this goal by hitting the target satisfaction results on the survey two out of three applicable years.

Despite not meeting its charter goals, Children's Guild PCS has partially met two goals and has shown improvement over the review period. DC PCSB staff recommends that the Board use its discretion to continue the school's charter, with conditions. Staff bases this recommendation primarily on the following factors:

- Children's Guild PCS initiated a turnaround plan school year 2015-2016, which included replacing the founding principal with a turnaround leader to improve the academic culture, create systems to improve operations, and reduce teacher turnover. These efforts have shown improvements in its academic program.
- Student learning outcomes in the school are improving as measured by the i-Ready assessment.
 - In math, students have seen year over year improvement since school year (SY) 2016-17, and both general education and special education students exceeded i-Ready targets for the past two years.
 - In ELA, both general education and special education students met their i-Ready targets for the first time in SY 2018-19, with general education students improving by 20.8 points since the previous year, and special education students improving by 34.3 points.
- Children's Guild PCS has shown improvements on the state assessment for ELA, between SY 2017-18 and SY 2018-19.
- Children's Guild PCS has shown improvements on school environment measures. The school had zero expulsions over the entire review period, and overall suspension rates have dropped year after year since the school opened.
- Further evidence of significant improvement in school environment can be seen in the school's Qualitative Site Reviews (QSR). In the school's most recent QSR, 78% of observations were rated distinguished or proficient in the Classroom Environment domain. The observers noted that "[c]lassrooms were calm and orderly; there were very few instances of misbehavior, indicating self-discipline, another piece of the

school's mission. Compared with the school's first years this transformation is truly remarkable."⁴

Despite the school's improvements, the review revealed that the school's academics are still lagging, and staff recommends that the Board address these concerns by imposing the condition outlined on the following page. Staff's concerns include:

- The school continues to perform below the sector average for similar populations in academic achievement in math on the state assessment, which is given to students in grades 3-8. The percent of students earning a score of approaching or at college and career ready levels declined in the last year and has shown an overall decline since SY 2015-16.
- Low academic rigor was noted in the school's most recent QSR, where only 38% of observations were rated as distinguished or proficient in the Instruction domain. The observers noted that "the instructional rigor was mixed. In some observations instruction was rote and required little to no critical thinking or creativity. In other observations, there were learning opportunities for students to think critically and explore multiple strategies."⁵ The school will need to continue to improve on academic indicators, and DC PCSB will closely monitor the school's academic progress over the next few years to ensure that the school is fully meeting the needs of its student population.

In addition to the above academic concerns, the school has not enrolled up to its enrollment ceiling in any year of the review period. Nor has the school successfully demonstrated that it can produce positive results with a larger population than it has historically served. While the school's charter authorizes it to offer up to grade 12, Children's Guild PCS has never expanded to high school and does not currently offer any high school grades or programming. Until the school has shown consistent academic success with its elementary and middle school programming, DC PCSB staff does not believe the school should be allowed to operate a high school.

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

⁴ Children's Guild PCS, April 5, 2019 QSR Strategies Report, Appendix A.

⁵ Children's Guild PCS, April 5, 2019 QSR Strategies Report, Appendix A.

Given the above findings, DC PCSB staff recommends the Board exercise its discretion to continue the school's charter with the following condition:

The school and DC PCSB will execute a charter agreement amendment by January 31, 2020, that commits the school to the following conditions:

- 1) Children's Guild PCS must eliminate its eligibility to serve grades 9-12, unless and until the school returns to DC PCSB to apply for a charter agreement amendment to expand its grade levels served beyond grade 8.
- 2) Children's Guild PCS must decrease its maximum enrollment ceiling from 850 students to 450 students. The school may not serve additional students unless and until it returns to DC PCSB to apply for a charter agreement amendment to expand its maximum enrollment beyond 450 students.

DC PCSB staff also recommends that the Board vote to approve Board Chair Rick Cruz to sign, on the Board's behalf, the charter agreement amendment containing the above conditions.

If the school does not agree to these terms and sign a charter agreement amendment by January 31, 2020, staff recommends that the Board vote to initiate revocation proceedings of the LEA.

CHARTER REVIEW STANDARD

The SRA stipulates that DC PCSB “shall review [a school’s] charter at least once every [five] years.”⁶ As part of this review, DC PCSB must determine whether:

- (1) The school committed a violation of applicable law 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; and/or
- (2) The school failed to meet the goals and student academic achievement expectations set forth in its charter.⁷

If DC PCSB determines that a school has committed a violation of applicable law or a material violation of the terms of its charter, or has not met its goals and academic achievement expectations, it may, at its discretion, revoke the school’s charter, or grant the school a conditional continuance.

Additionally, there is a fiscal component to the charter review. DC PCSB is required by the SRA to revoke a school’s charter if DC PCSB determines in its review that the school: (1) has engaged in a pattern of nonadherence to generally accepted accounting principles, (2) has engaged in a pattern of fiscal mismanagement, and/or (3) is no longer economically viable.⁸

⁶ D.C. Code § 38-1802.12(a)(3).

⁷ D.C. Code § 38-1802.13(a).

⁸ D.C. Code § 38-1802.13(b).

BACKGROUND INFORMATION ABOUT SCHOOL

School Overview

Children's Guild PCS began operation in SY 2015-16 under authorization from DC PCSB to educate students in grades kindergarten (K) through twelve. The school currently educates 327 students in grades K-8 at a single campus in Ward 5. While the school has authorization to enroll students in grades 9-12 at a high school campus, it has never done so. The school's mission is "to use the philosophy of Transformation Education to prepare special needs and general education students for college, career readiness, and citizenship in their community by developing in them critical thinking and creative problem-solving skills, self-discipline and a commitment to serve a cause larger than themselves."⁹

Children's Guild PCS was founded and is run by The Children's Guild organization, a nonprofit organization that has educated students with special needs through nonpublic schools and residential care programs in Maryland and Washington, DC since it was founded in 1953. Since 2010, The Children's Guild organization also operates a charter school, Monarch Academy Glen Burnie, in Anne Arundel County, Maryland, which was renewed for another five-year term in February 2019. The Children's Guild formerly operated another public charter school named Monarch Academy in Baltimore, Maryland. However, in January 2019, Baltimore City Board of School Commissioners voted 6-3 not to renew the school's charter because of the school's low academic performance.¹⁰

Transformation Education (TranZed) is a foundational philosophy of the school. It is an organizational philosophy that is "designed to transmit the values and life skills necessary for a successful life."¹¹ In support of this philosophy, the school offers an on-site student support center with support staff and trained clinicians that is used to build teacher capacity to create emotionally safe classrooms and help students develop self-regulation skills. In addition, each school day includes community building meetings for students in classrooms.¹²

On March 20, 2017, in the school's second year of operation, DC PCSB voted to approve Children's Guild PCS to be evaluated using the DC PCSB Alternative Accountability Framework (AAF).¹³ Based on a demographic analysis of its students in SY 2016-17, the school's population of students with at least one AAF risk factor exceeds the 60% minimum required to be considered for the AAF. The AAF requires the school to create mission-

⁹ Children's Guild DC, charter agreement, April 2015, Appendix B.

¹⁰ Monarch Academy has appealed the decision on legal and procedural grounds and is still awaiting a final decision.

¹¹ Children's Guild DC PCS, 2017-18 Annual Report, Appendix C.

¹² Children's Guild DC PCS, 2017-18 Annual Report, Appendix C.

¹³ Board Proposal, Alternative Accountability Framework – Vote on School Eligibility for Four Schools, June 2019, Appendix D.

specific goals that measure, at minimum, student achievement and student growth in ELA and math, and student engagement.

Enrollment and Demographic Trends

The tables below show the school's enrollment and demographics. The school's current enrollment is 327 students, which is well below its enrollment ceiling of 850. The school's audited enrollment has increased each year but was below projections every year of the review period except SY 2017-18. In SY 2019-20, enrollment dropped again below projections by more than 60 students. Therefore, staff recommends that the enrollment ceiling be lowered to 450, which is above the enrollment of any year to date. Part of the reason that the enrollment ceiling is more than double the school's actual enrollment is that the school is approved to offer a high school program. It currently does not have the capacity to do so. Therefore, in addition to lowering the enrollment ceiling to 450, DC PCSB staff also recommends that the school's charter be amended to revoke its authorization to offer grades 9-12.

The school serves a predominantly African-American student population. In SY 2018-19, 79% of its students were classified as at-risk,¹⁴ and 51% of the school's students were identified as students with disabilities. The school admits students in all grades that it serves.

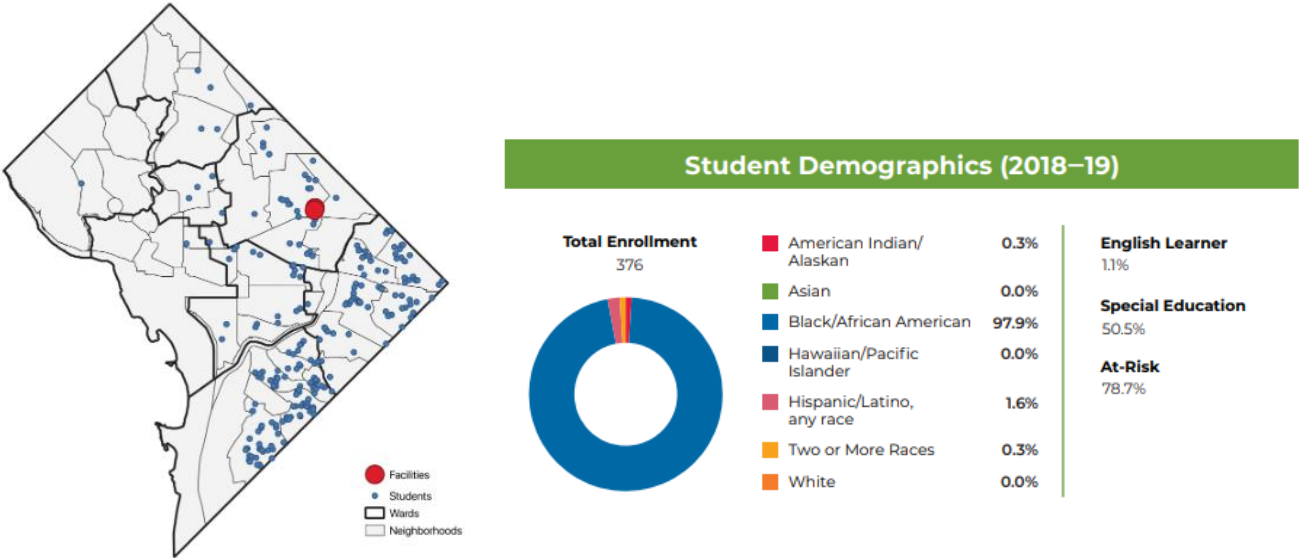
Children's Guild PCS – Enrollment					
School Year	2015-16	2016-17	2017-18	2018-19	2019-20
K	37	22	20	13	13
1	36	39	29	29	12
2	41	28	43	33	26
3	49	49	34	38	24
4	49	54	57	36	38
5	34	45	64	56	35
6	36	40	47	72	63
7	20	41	40	59	66
8	24	24	41	40	54
Total Audited Enrollment	326	342	375	376	331
Enrollment Projections	450	450	369	430	395
Enrollment Ceiling	450	550	650	750	850

The map below shows where Children's Guild PCS's students live in relation to the school, which is marked by a large red dot. Most of the school's students come from Ward 7 and 8,

¹⁴ The Office of the State Superintendent (OSSE) defines at-risk students as follows: "students who are homeless, in the District's foster care system, qualify for Temporary Assistance for Needy Families (TANF) or the Supplemental Nutrition Assistance Program (SNAP), or high school students that are one year older, or more, than the expected age for the grade in which the students are enrolled." Although adult and alternative schools do not receive at-risk student funding, OSSE still provides data on how many students each LEA educates, that meet the above definition for at-risk. See <http://bit.ly/2FuWdnu>.

where the school focuses its recruitment efforts.¹⁵ Each student is represented by a blue dot for SY 2018-19. The broad distribution of the school’s population is aided by the school’s provision of free bussing. The school offers door to door school bus or shuttle pickup and drop off throughout DC, which was utilized by 243 students in SY 2018-19. This service is offered to all students at the school free of charge. The school uses a combination of buses and shuttles/vans and there are approximately 42 total stops.

Student Enrollment - SY 2018-19



Communication with the School

On March 29, 2019 members of Children’s Guild PCS’s board and staff met with members of DC PCSB’s board and staff to discuss the school’s progress toward its charter goals ahead of its five-year review. Children’s Guild PCS stated that, in response to not meeting its academic targets, the school replaced its school leader during the 2015-2016 and put in place a turnaround leader and added academic coaches to improve student outcomes and build teacher capacity, which would lead to a reduction of teacher turnover. The school also highlighted other initiatives to improve student outcomes. DC PCSB expressed concern that the school was not meeting its goals, and with the length of time it has taken Children’s Guild PCS to respond to these issues, despite operating in the region for sixty-five years.

On April 26, 2019, DC PCSB staff met with members of the school’s staff to discuss the school’s five-year review. Staff provided the school with a chart similar to the one in Section

¹⁵ Children’s Guild PCS, 2017-18 Annual Report, pg. 10, Appendix C.

2 of this report, showing the school's goals performance for the past few years and the target it must meet in SY 2018-19 to meet its charter goals.

SECTION ONE: GOALS AND ACADEMIC ACHIEVEMENT EXPECTATIONS

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

Children's Guild PCS has three goals, each comprising several measures. The first goal captures all the school's academic achievement expectations and attendance, while goals two and three capture the school's environment using measures of discipline, student engagement, and parent engagement. The school first adopted its charter goals in July 2015, when its charter was fully approved. The school amended the measures within its academic goal in November 2016 by disaggregating student achievement by special education level and removing the Fountas and Pinnell (F&P) assessment. Several measures, which are noted throughout the body of this report, were intended for a potential high school expansion that did not occur and were thus not evaluated during this review period.

Children's Guild PCS proved its eligibility for the Alternative Accountability Framework (AAF) on March 20, 2017. Each school eligible for the AAF receives an annual scorecard reporting on measures aligned to its charter goals instead of the Performance Management Framework (PMF).¹⁶

The chart below summarizes DC PCSB's determinations of whether the school met its goals and student academic achievement expectations. For purposes of this five-year review, the measures under each goal are analyzed in order of the charter agreement. The assessments and/or measures used for Goal #1 are outlined in the summary below. Goal #2 has three measures divided into two categories—climate and discipline, and Goal #3 has one measure of parent satisfaction.

¹⁶ The PMF is DC PCSB's primary tool for evaluating school performance. A school earns points on the PMF based on its performance on common measures across schools serving similar grades.

Goals and Academic Expectations		Met?
1	To ensure that all students receive the support necessary to meet or exceed the curriculum standards and acquire the life skills necessary to be college and career ready, as evidenced by: <ul style="list-style-type: none"> i-Ready assessment State Assessment – Reading State Assessment – Math College and Career Readiness (not applicable) NCSC (not applicable) Fountas and Pinnell Reading Assessment Read 180 Intervention (not applicable) Attendance 	Not Met
2	To create a safe, academically and socially-rich environment that enables students to utilize creative expression, be self-disciplined and make learning a life-long process, as evidenced by: <ul style="list-style-type: none"> Gallup Student Poll Student Discipline 	Partially Met
3	To partner with parents, guardians, and the community as learning resources, as evidenced by: <ul style="list-style-type: none"> The National School Climate Survey for Parents 	Partially Met

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
<i>denominator</i>	<ul style="list-style-type: none"> Number of students included in the measure
Green	<ul style="list-style-type: none"> Greater than target set in school's charter agreement
Red	<ul style="list-style-type: none"> Less than the target set in the school's charter agreement
No Shading	<ul style="list-style-type: none"> The n-size was less than ten, which is the minimum cohort size set by the state.¹⁷

Note: The first two goals are composed of several measures (or subsections). In order to enhance readability, the assessment below is structured as follows:

- Goal language (displayed in **bold** and in call-out box).
- Summative assessment of the overall goal (displayed under Assessment).
- Subsection / Measure text as found in the charter agreement (displayed in a call-out box, measure name *italicized*) along with subsequent staff analysis and data tables.

¹⁷ The Every Student Succeeds Act ([ESSA State Plan](#)) designates ten as the minimum n-size.

GOAL 1

Goal 1

To ensure that all students receive the support necessary to meet or exceed the curriculum standards and acquire the life skills necessary to be college and career ready [...]

Assessment: **Children's Guild PCS did not meet this goal.** There are five applicable measures for this goal: i-Ready Reading, i-Ready Math, PARCC – English Language Arts (ELA), PARCC - Math, and attendance. The following pages contain staff's detailed assessment of each of these measures in turn. Overall, the school has not met a majority of the targets for any of these applicable measures, and therefore, this goal is not met.

However, the school has demonstrated progress on the i-Ready reading and math assessments, which are given in all grade levels currently offered at the school. In SY 2018-19, the school met its growth target in i-Ready reading for the first time, and in both SY 2017-18 and SY 2018-19, the school met its i-Ready math targets. Additionally, while the overall achievement rates on the state assessment in math remain below the state average for all subgroups, there has been consistent improvement over the review period. Finally, in-seat attendance, also a measure under this goal, has shown improvement in the most recent two years, but the school still remains 2.2 points below the target set by the school. This recent growth in academic performance is a contributing factor into staff's recommendation for continuance.

Despite these areas of improvement, overall achievement rates continue to lag behind the state average for similar students across every measure. Most concerning is that the rate of level 1 and 2 special education (SPED) students earning a score of Approaching College and Career Ready or higher (level 3+) on the PARCC in ELA has declined by 10.4 points since SY 2016-17. For these reasons, staff recommends establishing the conditions of continuance, as described earlier in this report.

i-Ready Assessment

i-Ready Assessment

- Annually, 50% of students at each grade level will meet or exceed their projected target (as indicated by the publisher) from the fall to spring administration of the i-Ready **reading** assessment.
- Annually, 50% of students at each grade level will meet or exceed their projected target (as indicated by the publisher) from the fall to spring administration of the i-Ready **math** assessment.
- Annually, 50% of **special education** students at each grade level will meet or exceed their projected target (as indicated by the publisher) from the fall to spring administration of the i-Ready **reading** assessment.
- Annually, 50% of **special education** students at each grade level will meet or exceed their projected target (as indicated by the publisher) from the fall to spring administration of the i-Ready **math** assessment.

i-Ready Reading

Children's Guild PCS's i-Ready measures are evaluated using two aggregations: all students and students with disabilities. In reading, fewer than half of the school's students met their growth target from fall to spring, as determined by i-Ready. However, from the first year of the review period to the last, the percent of students meeting growth targets has increased overall. For the past three years, the rate of students meeting their growth target has been higher for students with disabilities than the rate for all students. This indicates that the school's reading program may be more effective for its special education population.

Children's Guild PCS— i-Ready Reading Grades K-8								
	SY 2015-16		SY 2016-17		SY 2017-18 ¹⁸		SY 2018-19	
	Rate	Target	Rate	Target	Rate	Target	Rate	Target
All Students	28.7	50.0	43.6	50.0	34.6	50.0	55.4	50.0
<i>denominator</i>	223		335		355		361	
Special Education Students	24.5	50.0	48.0	50.0	35.3	50.0	69.6	50.0
<i>denominator</i>	94		152		173		184	

i-Ready Math

The school met its i-Ready math targets in two out of the four years of the review period, thus partially meeting this sub-measure, and the school has shown consistent improvement in its i-Ready math performance each year since SY 2016-17. Similar to the school's reading performance, special education students at the school have repeatedly outperformed the all student aggregation. This trend in disparate performance indicates that in both reading and math, general education students are underperforming their peers at the school who receive special education services. In SY 2018-19, special education students exceeded the i-Ready math target by 16.8 percentage points, whereas all students exceeded the target by only 1.2 percentage points. In the previous year of SY 2017-18, all student and special education student performance more closely mirrored one another at 50.7% and 53.2%, respectively.

The Children's Guild PCS— i-Ready Math Grades K-8								
	SY 2015-16		SY 2016-17		SY 2017-18 ¹⁹		SY 2018-19	
	Rate	Target	Rate	Target	Rate	Target	Rate	Target
All Students	39.5	50.0	38.7	50.0	50.7	50.0	51.2	50.0
<i>denominator</i>	223		335		355		361	
Special Education Students	46.8	50.0	41.3	50.0	53.2	50.0	66.8	50.0
<i>denominator</i>	94		152		173		184	

¹⁸ On the SY 2017-18 AAF Scorecard, DC PCSB published the i-Ready rates disaggregated by non-special education students and special education students.

¹⁹ See footnote above.

State Assessment – Reading

- For SY 2015-16, the percent of **special education students** in grades 3 through 11 scoring proficient or advanced on the state assessment in reading will exceed the state average for special education students for the **reading** assessment.
- Annually, the **percent of level 1 and level 2 (combined) special education** students at Children's Guild DC PCSB in grades 3 through 12 **scoring level 3 and above** on the state assessment in **reading** will exceed the percent of level 1 and level 2 (combined) special education students scoring level 3 and above for the reading assessment city-wide.
- Annually, the percent of **level 3 and level 4 (combined) special education** students at Children's Guild DC PCSB in grades 3 through 12 **scoring level 3 and above** on the state assessment in **reading** will exceed the percent of level 3 and level 4 (combined) special education students scoring level 3 and above for the reading assessment city-wide.
- Annually, the percent of **level 1 and level 2 (combined) special education** students at Children's Guild DC PCSB in grades 3 through 12 **scoring level 4 and above** on the state assessment in **reading** will exceed the percent of level 1 and level 2 (combined) special education students scoring **level 4 and above** for the reading assessment city-wide.
- Annually, the percent of **level 3 and level 4 (combined) special education** students at Children's Guild DC PCSB in grades 3 through 12 scoring **level 4 and above** on the state assessment in **reading** will exceed the percent of level 3 and level 4 (combined) special education students scoring level 4 and above for the reading assessment city-wide.
 - *** For all the above goals, if n-size is too small per guidelines in the PMF Guide to calculate the goal as written, the goal will combine students with special education levels 1-4 and compare the percent of special education students at the school scoring 3 or above and 4 or above (separately) to the performance of special education students city-wide.*
- Annually, the percent of **special education students** in grades 3 through 11 scoring **proficient or advanced on the alternative state assessment in reading** will exceed the state average for special education students for the reading assessment.
- In SY 2015-16, the percent of **non-special education students** in grades 3 through 11 scoring **level 4 or above** (proficient or advanced) on the state assessment in reading will meet or exceed the charter sector average for non-special education students for the reading assessment.
- Annually, the percent of **non-special education students** in grades 3 through 12 scoring **level 3 or above** on the state assessment in reading will exceed the percent of non-special education students city-wide scoring level 3 or above on the state assessment in reading.

State Assessment – Reading (SY 2015-16)

In SY 2015-16, the school's achievement goals did not disaggregate special education levels and instead compared all students receiving special education services to the all special education student state average. The school's general education students were compared to all general education students in the charter sector.²⁰ Both subgroups fell below their respective targets in SY 2015-16. The rate of the school's special education students who scored at level 3+ on the PARCC was 9.8 percentage points below the state average; the percent of non-special education students who scored at level 3+ was a full 31.8 percentage points below the charter sector average.

Children's Guild PCS— State Assessment – Reading Grades 3-8			
		SY 2015-16	
		School	Target
Special Education	% 3+	7.6	17.4
	% 4+	0.0	5.6
	<i>denominator</i>	66	
Non-Special Education	% 3+	31.1	62.9
	% 4+	5.6	33.3
	<i>denominator</i>	90	

²⁰ In SY 2015-16, data disaggregated by non-special education students was not readily available at the state level. DC PCSB used the charter sector average instead since charter sector data is within its control.

State Assessment – Reading (SY 2016-17 and beyond)

The school amended its goals in November 2016 to disaggregate special education performance on the state assessment by special education level. Special education level (or SPED level) refers to the “total number of hours per week a student receives specialized instruction and related services. . . and any dedicated aide hours.”²¹ There are four SPED levels; students in level 1 receive the fewest hours, and students in level 4 receive the most. Additionally, the school aligned the non-special education target to compare against the state average. The school’s targets are set at the statewide average for each subgroup in the same grade band, but it should be noted that while 78.7% of the school’s students were designated at-risk in SY 2018-19, the comparison group is currently *all* students.

As shown in the chart below, the school's best performance on the state assessment in reading was in SY 2016-17, when both special education subgroups outperformed the state average in scoring level 3+. The percent of students scoring at level 3+ declined in each subgroup from SY 2016-17 to SY 2017-18.

Notably, non-special education students significantly lag their peers at other schools and have shown little to no improvement. As they make up most of the student body, this is a significant concern.

Children’s Guild PCS— State Assessment – Reading Grades 3-8							
		SY 2016-17		SY 2017-18		SY 2018-19	
		School	State	School	State	School	State
SPED Levels 1 & 2	% 3+	21.9	18.6	12.5	22.8	11.5	27.5
	% 4+	3.1	5.8	8.3	7.8	3.8	10.6
	<i>denominator</i>	32		24		26	
SPED Levels 3 & 4	% 3+	7.6	7.1	5.4	8.3	7.3	9.4
	% 4+	0.0	2.0	0.9	2.0	0.9	2.8
	<i>denominator</i>	79		111		110	
Non-Special Education	% 3+	31.5	60.6	28.3	66.0	28.9	69.3
	% 4+	6.5	35.5	4.2	39.8	7.9	44.1
	<i>denominator</i>	121		120		114	

²¹ [Student Enrollment Audit and Child Count Handbook](#) (pg. 57)

State Assessment – Reading (Alternative State Assessment)

Fewer than ten students qualified for the alternative state assessment during every year of the review period. Therefore, the school did not meet the minimum n-size of ten required for DC PCSB to evaluate this measure. This sub-measure is not included in the determination of the goal.

State Assessment – Math

- For SY 2015-16, the percent of **special education students** in grades 3 through 11 scoring **proficient or advanced** on the state assessment in reading will exceed the state average for special education students for the math assessment.
- Annually, the percent of **level 1 and level 2 (combined) special education** students at Children's Guild DC PCSB in grades 3 through 12 **scoring level 3 and above** on the state assessment in math will exceed the percent of level 1 and level 2 (combined) special education students scoring level 3 and above for the math assessment city-wide.
- Annually, the percent of **level 3 and level 4 (combined) special education** students at Children's Guild DC PCSB in grades 3 through 12 **scoring level 3 and above** on the state assessment in math will exceed the percent of level 3 and level 4 (combined) special education students scoring level 3 and above for the math assessment city-wide.
- Annually, the percent of **level 1 and level 2 (combined) special education students** at Children's Guild DC PCSB in grades 3 through 12 **scoring level 4 and above** on the state assessment in math will exceed the percent of level 1 and level 2 (combined) special education students scoring level 4 and above for the math assessment city-wide.
- Annually, the percent of level 3 and level 4 (combined) special education students at Children's Guild DC PCSB in grades 3 through 12 **scoring level 4 and above** on the state assessment in math will exceed the percent of level 3 and level 4 (combined) special education students scoring level 4 and above for the math assessment city-wide.
 - *** For all the above goals, if n-size is too small per guidelines in the PMF Guide to calculate the goal as written, the goal will combine students with special education levels 1-4 and compare the percent of special education students at the school scoring 3 or above and 4 or above (separately) to the performance of special education students city-wide.*
- Annually, the percent of special education students in grades 3 through 11 scoring proficient or advanced on the alternative state assessment in math will exceed the state average for special education students for the math assessment.
- In SY 2015-16, the **percent of non-special education students** in grades 3 through 11 **scoring proficient or advanced** on the state assessment in math will meet or exceed the charter sector average for non-special education students for the math assessment.
- Annually, the percent of **non-special education students** in grades 3 through 12 **scoring level 3 or above** on the state assessment in math will exceed the percent of non-special education students city-wide scoring level 3 or above on the state assessment in math.
- Annually, the percent of **non-special education students** in grades 3 through 12 **scoring level 4 or above** on the state assessment in math will exceed the percent of non-special education students city-wide scoring level 4 or above on the state assessment in math.

State Assessment – Math (SY 2015-16)

Similar to reading, the school's achievement goals in math did not disaggregate special education levels and instead compared those students to the all special education student state average in SY 2015-16. The general education students were compared to all general education students in the charter sector. Both subgroups performed particularly low in SY 2015-16, irrespective of the state average. Only 23 out of the 156 students tested overall scored at or above a level 3 on the state math assessment.

Children's Guild PCS— State Assessment – Math Grades 3-8			
		SY 2015-16	
		School	State
Special Education	% 3+	3.1	20.0
	% 4+	0.0	7.1
	<i>denominator</i>	65	
Non-Special Education	% 3+	21.1	60.4
	% 4+	2.2	31.6
	<i>denominator</i>	90	

State Assessment – Math (SY 2016-17 and beyond)

Similar to ELA, the school amended its goals in November 2016 to disaggregate special education performance on the state assessment by special education level. As previously noted, SPED level refers to the “total number of hours per week a student receives specialized instruction and related services. . . and any dedicated aide hours.”²² Additionally, the school aligned the non-special education target to compare against the state average. The school's targets are set at the statewide average for each subgroup in the same grade band, but it should be noted that while 78.7% of the school's students were designated at-risk in SY 2018-19, the comparison group is currently *all* students.

In SY 2016-17, SPED level 3 and 4 students made up 33.8% of the school's test-taking population, and these students scored above the state average in both level 3+ and level 4+. The school did not maintain this performance with SPED level 3 and 4 students in the following years, however. Unlike SPED level 3 and 4 students at the school, SPED level 1 and 2 students have shown consistent improvement on the state math assessment during the previous three years.

As with reading, the math performance of non-special education students, who make up a majority of the school's population, is of great concern, particularly as these results are declining each year.

²² [Student Enrollment Audit and Child Count Handbook](#) (pg. 57)

Children's Guild PCS— State Assessment – Math Grades 3-8							
		SY 2016-17		SY 2017-18		SY 2018-19	
		School	State	School	State	School	State
SPED Levels 1 & 2	% 3+	9.4	20.3	12.5	24.9	16.7	29.0
	% 4+	0.0	6.3	0.0	9.1	4.2	10.3
	<i>denominator</i>	32		24		24	
SPED Levels 3 & 4	% 3+	12.8	7.9	6.3	10.3	1.8	10.7
	% 4+	2.6	2.3	0.9	2.9	0.9	3.2
	<i>denominator</i>	78		112		110	
Non-Special Education	% 3+	32.3	58.3	26.7	62.9	25.0	64.6
	% 4+	8.9	31.5	3.3	35.9	3.4	37.4
	<i>denominator</i>	121		120		116	

State Assessment – Math (Alternative State Assessment)

Fewer than ten students qualified for the alternative state assessment during every year of the review period. Therefore, the school did not meet the minimum n-size of ten required for DC PCSB to evaluate this measure. This sub-measure is not included in the determination of the goal.

College and Career Readiness

- The four-year graduation cohort rate for non-disabled students will meet or exceed the state average for non-disabled students.
- 80% of Certificate of Completion Students who are aged 18 on the last day of school for the school year will graduate with a certificate of IEP completion by age 21.

When the school first adopted its charter goals and academic achievement expectations, the goals were written to capture all students should the school expand to offer high school grades. The school currently does not operate through high school, and thus the above measures are not applicable.

National Center and State Collaborative Alternative Assessment

- Annually, the percent of special education students scoring proficient or advanced on the ELA portion of the NCSC will meet or exceed the state average for special education students at each grade level on the NCSC reading assessment.
- Annually, the percent of special education students scoring proficient or advanced on the Math portion of the NCSC will meet or exceed the state average for special education students at each grade level on the NCSC math assessment.

The National Center and State Collaborative Alternative Assessment developed into the Multi-State Alternate Assessment (MSAA).²³ MSAA is captured in the school's State Assessment goals as the "Alternative State Assessment," and thus the above measure is not applicable.

²³ <https://osse.dc.gov/sites/default/files/dc/sites/osse/publication/attachments/2018-19%20MSAA%20Test%20Administration%20Manual.pdf> (pg. 3)

Fountas & Pinnell Reading Assessment

- For SY 2015-16, 65% of general education students in grades K-8 will meet grade level benchmarks on running records from the fall to spring.
- For SY 2015-16, 65% of special education students in grades K-8 will meet grade level benchmarks on running records from the fall to spring.

The school adopted the Fountas and Pinnell assessment to measure reading progress in SY 2015-16, but removed the goal in its November 2016 charter agreement amendment. During SY 2015-16, the school did not administer the Fountas and Pinnell assessment²⁴ despite it being a part of the school's goals and academic achievement expectations at the time.

Children's Guild PCS— Fountas & Pinnell Reading Assessment		
	SY 2015-16	
	School	Target
Special Education	Assessment not given	65.0
Non-Special Education		65.0

Read 180 Intervention

- Annually, as measured in the spring of the school year, 75% of intervention students will meet the projected progress on the Spring administration on Read 180 as determined by the Lexile level in the Fall administration.

Read 180 Intervention was intended for use with high school students should the school expand to serve high school grades. The measure above is not applicable during this review period.

In-Seat Attendance

- Annually, the in-seat attendance rate will meet or exceed 90%.

During every year of the review period, the school's in-seat attendance rate has been below the target of 90.0%. The school's rate dropped from SY 2015-16 to SY 2016-17 by two percentage points, but it has shown consistent improvement over the past two years. The school's in-seat attendance rate of 87.8% in SY 2018-19 was the highest of any alternative public charter school in the District. As noted, the school offers a free bussing program.

Children's Guild PCS In-Seat Attendance

	2015-16		2016-17		2017-18		2018-19	
	School	Target	School	Target	School	Target	School	Target
All Students	88.4	90.0	86.4	90.0	86.9	90.0	87.8	90.0

²⁴ In an email to DC PCSB staff on December 19, 2018, the school confirmed that the assessment was not given, Appendix E.

GOAL 2

Goal 2

To create a safe, academically and socially-rich environment that enables students to utilize creative expression, be self-disciplined and make learning a life-long process [...]

Assessment: **Children’s Guild PCS partially met this goal.** The school has consistently improved its school environment throughout the review period. Suspension rates have declined for both general education students and special education students by 12.6 points and 23.3 points, respectively, since the start of the review period. The school has increased its performance on the engagement domain of the Gallup Student Poll and maintained its performance on the “hopeful” domain, indicating the school is taking positive steps toward a better school climate for students. The school’s long-term suspension rate declined the first three years of the review period, but increased in SY 2018-19. The school did not expel students during the entirety of the review period. Despite the school’s progress, it failed to meet many of its targets under this goal, and thus this goal is partially met.

Gallup Student Poll

- Annually, the grand mean of students will meet or exceed the national grand mean on the “Hopeful” domain on a scale of 1 (strongly disagree) to 5 (strongly agree) on the Gallup Student Poll.
- Annually, the grand mean of students will meet or exceed the national grand mean on the “Engagement” domain on a scale of 1 (strongly disagree) to 5 (strongly agree) on the Gallup Student Poll.

Each year, the school administers the Gallup Student poll. According to Gallup,

“The [...] Poll helps educators provide a more positive school culture and measures hope for the future, engagement with school, and other factors that have been shown to drive students' grades, achievement scores, retention and future employment.”²⁵

Student responses are given on a Likert scale, with one being strongly disagree and five being strongly agree for each domain.

The school chose to include two of the possible domains in its charter goals: “Hopeful” and “Engagement.” The school’s target for both domains is the equivalent of an average national response. The school exceeded the national average on the “Hopeful” domain during every year of the review period. In the “Engagement” domain, the school outperformed the national average on the engagement domain during the latter half of the review period. The results on this poll suggest the school has maintained a positive school climate of hopefulness, and it has increased its level of student engagement.

²⁵ <https://www.gallup.com/education/233537/gallup-student-poll.aspx>

Children's Guild PCS – Gallup Student Poll Results								
	2015-16		2016-17		2017-18		2018-19	
	School	Target	School	Target	School	Target	School	Target
Hopeful Domain	4.3	4.2	4.3	4.2	4.4	4.2	4.3	4.2
Engagement Domain	3.8	3.9	3.8	3.9	4.1	3.9	4.1	3.9

Student Discipline

- Annually, the school's rate for suspensions, long-term suspensions, and expulsions will be lower than the rates for the state in the following categories: general education and special education students.

Suspensions²⁶

The school has had significant annual improvements on its suspension rate during every year of the review period, indicating a trend toward a more positive school environment. From SY 2015-16 to SY 2016-17 alone, the school decreased its suspension rate among general education students by 9.1 percentage points, and by 13.9 percentage points among special education students. In SY 2017-18, the school's suspension rate for special education students was 2.1 points lower than the state average, and the school met its target for the first time in the review period. In SY 2018-19, the school met the target for general education students for the first time.

Children's Guild PCS Suspensions								
	2015-16		2016-17		2017-18		2018-19	
	School	Target	School	Target	School	Target	School	Target
General Education	18.0	6.6	8.9	6.5	7.0	5.9	5.4	6.5
Special Education	31.7	15.0	17.8	14.8	12.0	14.1	8.4	6.7

Long-Term Suspensions²⁷

The school lowered its long-term suspension rate the first three years of the review period. From SY 2015-16 to SY 2017-18, the long-term suspension rate declined 3.0 percentage points among general education students and 4.6 percentage points among special education students. However, in SY 2018-19, both rates increased to the second highest rates of long-term suspension during the review period. This indicates that while the school's suspension rate overall declined in SY 2018-19, the students who were suspended received longer suspensions than the previous year (SY 2017-18).

²⁶ For brevity, only suspension has been displayed on the school's Alternative Accountability Framework (AAF) scorecard each year.

²⁷ Long-term suspensions refers to those students who were suspended for six or more days.

Children's Guild PCS—Long-Term Suspensions								
	2015-16		2016-17		2017-18		2018-19	
	School	Target	School	Target	School	Target	School	Target
General Education	3.5	1.0	2.4	0.9	0.5	0.1	2.5	1.9
Special Education	5.2	2.3	1.5	2.5	0.6	0.4	2.3	1.5

Expulsions

The school did not expel any students during the review period, and therefore met the target each year.

Children's Guild PCS—Expulsions								
	2015-16		2016-17		2017-18		2018-19	
	School	Target	School	Target	School	Target	School	Target
General Education	0.0	0.1	0.0	0.1	0.0	0.1	0.0	0.1
Special Education	0.0	0.2	0.0	0.1	0.0	0.1	0.0	0.1

GOAL 3

Goal 3

To partner with parents, guardians, and the community as learning resources as evidenced by:

The National School Climate Survey for Parents:

- Annually, the mean score on (the domains of Connectedness and Engagement will be 4.0 or higher on a scale of 1 (strongly disagree) to 5 (strongly agree).

Assessment: **Children’s Guild PCS partially met this goal.** The goal is intended to measure parent engagement and uses the National School Climate Survey (NSCS) for Parents. The school met its target during two out of three measurable school years, and thus the goal is partially met.

The NSCS for Parents was administered by the school during every year of the review period. The survey is a “nationally-recognized school climate survey that provides an in-depth profile of [a] school community’s particular strengths, as well as areas for improvement.”²⁸ The school chose to use the Connectedness and Engagement domain as its measure of goal attainment. Similar to the Gallup Student Poll, the NSCS uses a Likert scale, with one indicating strongly disagree and five indicating strongly agree. The school’s mean score was above a 4.0 during SY 2016-17 and SY 2017-18, but it fell below 4.0 in SY 2018-19. Notably, the school has had very few respondents on the survey compared to its student population as a whole. Only thirteen parents or guardians responded in SY 2017-18, but the school’s audited enrollment was 375 students.

Children’s Guild PCS								
National School Climate Survey for Parents								
	2015-16		2016-17		2017-18		2018-19	
	School	Target	School	Target	School	Target	School	Target
Connectedness & Engagement	N/A ²⁹	4.0	4.5	4.0	4.4	4.0	3.8	4.0
<i>respondents</i>	7		35		13		32	

Additional Academic Data

Qualitative Site Review (QSR)

DC PCSB conducts QSRs of charter schools to observe qualitative evidence of the extent to which the school is meeting its mission and goals, as well as to assess classroom environment and quality of instruction. Between February 4 – February 15, 2019, in anticipation of this charter review analysis, DC PCSB conducted a QSR of Children’s Guild PCS. The QSR team observed multiple teachers in every room, and the relationships between students and teachers appeared warm and caring. Instructional rigor was mixed

²⁸ <https://www.schoolclimate.org/services/measuring-school-climate-csci>

²⁹ Fewer than ten parents responded in SY 2015-16, falling below the minimum cohort size that DC PCSB will use to evaluate a measure. This measure was therefore not applicable in SY 2015-16.

across classrooms. In some observations, instruction was rote and required little to no critical thinking. In other observations, students were explicitly asked to explain their thinking. In QSRs, each observed classroom is assigned an Unsatisfactory, Basic, Proficient, or Distinguished rating in classroom environment and instruction. The following table details the percentage of classrooms that were rated proficient or distinguished in each domain.

	Classroom Environment	Instruction
Children's Guild PCS	78%	38%
Average score for PK-8 schools	76%	68%
Average score for alternative schools	62%	52%

Children's Guild PCS was above the charter sector average in classroom environment when compared to other PK-8 schools that have received a QSR in the last five years. The QSR team noted a warm and caring school environment as well as very few instances of disciplinary issues. As the QSR team also stated, this was a vast improvement from DC PCSB's initial visits to the school in its opening years.³⁰

Children's Guild PCS scored below average in the instruction domain compared to other PK – 8 schools that received a QSR over the past five years. While the school has made great strides in improving the school environment, instruction continues to lag behind; this must be improved over the next few years if Children's Guild PCS is to continue making academic gains.

³⁰ See Children's Guild PCS QSR Report, pg. 3, Appendix A.

SECTION TWO: COMPLIANCE WITH CHARTER AND APPLICABLE LAWS

The SRA requires DC PCSB to determine at least once every five years whether a school has “committed a violation of applicable law 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.”³¹ The SRA contains a non-exhaustive list of applicable laws, which DC PCSB monitors in its annual compliance reviews. The below section discusses the school’s compliance for this review period.

Since SY 2015-16, Children’s Guild PCS has been compliant with **ALL** the following applicable laws:³²

- 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 report key contract information specifying any qualifying procurement contract that the school has executed.

During the fiscal year (FY) 2017 and FY 2018 reconciliation process, DC PCSB found that Children’s Guild PCS properly submitted one procurement contract package for each year. While this number is low, the consistent submission patterns suggest the LEA is in compliance with procurement contract submission requirements.

On July 1, 2018, DC PCSB began implementing a new *Procurement Contract Submission and Conflicting Interest Policy*, which tracks the timeliness of procurement contract documentation submissions. The school submitted one complete contract package during

³¹ D.C. Code § 38.1802.13(a).

³² Children’s Guild PCS Compliance Reports, Appendix F.

FY 2019. The school seems to have appropriate internal procedures to ensure timely submission of documentation to DC PCSB. The school has submitted one procurement contract package to date for FY 2020.

Special Education Compliance

Charter schools are required to comply with all federal and local special education laws, including the Individuals with Disabilities Education Act³³ (IDEA) and Section 504 of the Rehabilitation Act of 1973.³⁴ The following section summarizes the LEA's special education compliance from SY 2015-16 to the present.

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

As the State Education Agency (SEA), OSSE monitors charter schools' special education compliance and publishes detailed findings in the following reports:

- (1) Annual Determinations
- (2) On-Site Monitoring
- (3) IDEA Procedural Timeliness Monitoring (Initial Evaluation, Reevaluation)
- (4) Child Find Monitoring
- (5) Significant Discrepancy and Disproportionate Representation Review
- (6) Significant Disproportionality Review
- (7) Hearing Officer Determination Implementation Review

Below is a summary of the compliance areas for which OSSE required Children's Guild PCS to take corrective action during the review period:

- Annual Determinations
- Child Find Requirements
- Disproportionate Representation
- Significant Disproportionality

Further detailed information on OSSE's findings regarding special education compliance is 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.³⁵ 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).

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

³⁴ 29 U.S.C. § 794.

³⁵ As required by federal regulation 34 C.F.R. § 300.600(c).

Children's Guild PCS's Annual Determination compliance performance is detailed in the table below.³⁶

Year	Percent Compliant with Audited Special Education Federal Requirements	Determination Level ³⁷
2015	61%	Needs Assistance
2016	76%	Needs Assistance
2017	82%	Meets Requirements

Children's Guild PCS received a Needs Assistance designation in its 2015 and 2016 Determinations. OSSE's letter to Children's Guild PCS upon receiving a Needs Assistance designation for two consecutive years required that the LEA.³⁸

1. Develop a corrective action plan that addresses identified areas of noncompliance, and includes due dates for submission of proposed evidence demonstrating completion of the corrective action plan. The corrective action plan must reflect that all corrective actions will be completed by no later than August 2, 2019.
2. Submit a copy of the corrective action plan for approval to the OSSE LEA monitor.

OSSE further required that the Children's Guild PCS team continue working with OSSE to obtain training and technical assistance support around the areas of noncompliance of identified in the determination. OSSE confirmed that Children's Guild PCS timely submitted a corrective action plan to OSSE and has worked with OSSE to obtain the required training and support.

(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,³⁹ 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,⁴⁰ which OSSE then uses to determine if an LEA will receive on-site

³⁶ See Annual Determination reports, attached to this report as Appendix G.

³⁷ IDEA requires OSSE, as the 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.

³⁸ See Children's Guild PCS's 2016 Annual Determination letter, attached to this report as Appendix H.

³⁹ See <https://osse.dc.gov/publication/risk-based-monitoring-guidance>.

⁴⁰ Part B of IDEA applies to students ages 3-22.

monitoring.⁴¹ LEAs are responsible for being 100% compliant with student-level indicators and LEA-level indicators on On-Site Monitoring Reports.⁴²

In 2017, OSSE published an On-Site Compliance Monitoring Report of Children's Guild PCS based on the school's performance in SY 2016-17.⁴³ All compliance indicators were compliant for both LEA-level and student-level compliance.

On-Site Investigation Monitoring Report⁴⁴

In March 2017, OSSE conducted an investigation into concerns related to the implementation of the charter school's Diagnostic and Evaluation Center/Program. Through the investigation, which included a site visit with a representative from DC PCSB present, OSSE identified several findings of noncompliance with the charter school's adherence to specific provisions related to the provision of a free and appropriate public education (FAPE) in the least restrictive environment (LRE) of IDEA, 5-E DC Municipal Regulations Section 3019, and OSSE's state level placement policy and procedures. The data also showed misalignment of the diagnostic program in how it was being implemented as compared to how it was described in the school's charter application. To correct the identified areas of noncompliance, OSSE required the LEA complete action steps and submit a Corrective Action Plan to OSSE by a specified date.

OSSE confirms that the school has addressed and corrected each of the findings issued through the investigation.

(3) IDEA Procedural Timeliness

OSSE monitored Children's Guild PCS in two areas related to timeliness of creating and maintaining compliant Individualized Education Programs (IEP) for students: Initial Evaluation and Reevaluation.

Initial Evaluation

An initial evaluation is a process consisting of a set of procedures and/or assessments used in accordance with the IDEA and District of Columbia law to determine: (1) whether a child has a disability, and if so, (2) the nature and extent of the special education and related services that the child needs.⁴⁵

⁴¹ 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.

⁴² 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.

⁴³ See SY 2016-17 On-Site Monitoring Report Attachments, attached to this report as Appendix I.

⁴⁴ See OSSE Investigation Monitoring Report of Children's Guild PCS as Appendix J.

⁴⁵ 5-E D.C.M.R. § 3001.

Under District of Columbia law,⁴⁶ the LEA must make reasonable efforts to obtain parental consent for initial evaluation within thirty calendar days of referral and complete an initial evaluation of a child suspected of having a disability, including the determination of eligibility, within sixty calendar days of receiving parental consent.

Children's Guild PCS was flagged for noncompliance for not adhering to the required timeline for initial evaluation⁴⁷ during the following school years:

- SY 2018-19 Q1 and Q2 (July 1, 2018 - December 30, 2018) Report
- SY 2015-16 May 2016 (October 1, 2015 - March 31, 2016) Report

OSSE confirms that the school has addressed each of the findings issued above.

Reevaluation

A reevaluation is defined as an evaluation, conducted after the initial evaluation, to determine whether a child with a disability still has a disability. The LEA must conduct a reevaluation at least once every three years, whether or not a child's needs have changed, unless the parent and the LEA agree that a reevaluation is unnecessary.⁴⁸

Children's Guild PCS was flagged for noncompliance for not adhering to the required timeline for reevaluation during the following school years:

- SY 2018-19 May 2019 (October 1, 2018 - March 31, 2019) Report
- SY 2017-18 August 2017 (April 1, 2017 - June 30, 2017) Report
- SY 2015-16 May 2016 (October 1, 2015 - March 31, 2016) Report

OSSE confirms that the school has addressed SY 2015-16 May and SY 2017-2018 August findings. The school has not yet corrected the areas of noncompliance identified in the SY 2018-19 May findings, as these findings are not due for correction until May 2020.

(4) 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. Consistent with a judicial order,⁴⁹ OSSE continues to audit every LEA's identification rate of enrolled students receiving special education services against the 8.5% target enrollment established in the case. OSSE also conducted desktop reviews of

⁴⁶ D.C. Code § 38-2561.02(2)(A).

⁴⁷ For IDEA Purposes, OSSE only monitors schools for the second part of the Initial Evaluation timeline (parental consent to eligibility being completed in 60 days).

⁴⁸ 5-E D.C.M.R. § 3005.7.

⁴⁹ D.L. v. The District of Columbia (Case No. 1:05-cv-01437), 860 F.3d 713 (DC Cir. 2017).

all LEA child find policies to ensure that they were compliant with the law and did not adversely affect identification rates.⁵⁰

As described in a letter to LEA's leader,⁵¹ OSSE found that in SY 2017-18, Children's Guild PCS identified above the 8.5% target enrollment. However, OSSE also reviewed Children's Guild PCS's child find policy, procedures, and practices and determined that they were not compliant with IDEA and local law. As a result, OSSE required that Children's Guild PCS:

- Revise its policies to address the identified areas of noncompliance;
- Conduct training for all instructional staff, support staff, principals and other school administrators regarding child find processes and procedures prior to the beginning of the 2018-19 school year; and
- Submit documentation to its LEA monitor that it has completed training of all staff by October 15, 2018.

OSSE confirms that the school revised its policies, completed training requirements, and submitted required documentation by the October 15, 2018 deadline.

(5) Disproportionate Representation Review

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

In May 2018⁵² and again in May 2019,⁵³ OSSE notified Children's Guild PCS that it was found to have disproportionate representation in the area of:

- Overidentification of African American students as students with disabilities.

OSSE requested in both notification letters to the school that the LEA complete and submit a self-study assessment. Upon review of the self-study, OSSE determined that

⁵⁰ 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>.

⁵¹ Please find the Child Find Focused Monitoring Report for Children's Guild PCS attached as Appendix K.

⁵² See 2017-18 Disproportionate Representation Review Report for Children's Guild PCS attached as Appendix L.

⁵³ See 2018-19 Disproportionate Representation Review Report for Children's Guild PCS attached as Appendix M.

the LEA does not have disproportionate representation data based on inappropriate identification.⁵⁴⁵⁵

Significant Discrepancy Review

OSSE annually reviews LEAs' rates of suspension and expulsion for students with disabilities as compared to their non-disabled peers. This review is based on the prior school year's data. OSSE will annually define what constitutes "significant discrepancy" between these two rates. In FY 2017, this definition required two conditions to be met:

- Any excess in the rate of long-term suspension and expulsion between students with disabilities and students without disabilities; and,
- A rate ratio of 1.5 or higher, meaning students with disabilities from a particular racial or ethnic group are suspended or expelled at a rate that is at least one and a half times greater than the rate for all nondisabled students.

For those LEAs found to have significant discrepancy, OSSE requires the LEA to complete and submit a self-study to review its own policies and practices related to the development and implementation of individualized education programs (IEPs), procedural safeguards, and the use of positive behavioral interventions and supports. An LEA will be cited for significant discrepancy noncompliance only if the school's policies and practices do not comply with regulatory requirements.

OSSE determined that the LEA does not have a significant discrepancy based on noncompliant policies and procedures.

(6) Significant Disproportionality Review

OSSE annually reviews LEAs for significant disproportionality when students in a racial or ethnic group are more likely to be:

- Identified as a student with a disability;
- Identified as a student with a particular disability;
- Placed in more restrictive settings; or
- Suspended or expelled at a higher rate than students in other racial or ethnic groups.

In August 2019,⁵⁶ Children's Guild PCS was notified that it was found to have significant disproportionality due to identification of children in specific disability categories and placement of children with disabilities in particular educational settings.

⁵⁴ See 2017-18 Results of Disproportionate Representation Review attached as Appendix N.

⁵⁵ See 2018-19 Results of Disproportionate Representation Review attached as Appendix O.

⁵⁶ See 2018-19 Significant Disproportionality Review Report for Children's Guild PCS, attached to this report as Appendix P.

OSSE required in its notification letter to the school that the LEA reserve 15% of its Part B IDEA funding for Comprehensive Coordinated Early Intervention Services (CEIS) and submit documentation and attend technical assistance webinars.

(7) 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. The chart below shows the two special education administrative due process complaints brought against the school during the review period that resulted in a finding of noncompliance by a Hearing Officer.⁵⁷

Transmittal Date ⁵⁸	HOD Implementation and Timeliness Status ⁵⁹
3/1/2016	Implemented timely
6/1/2017	Implemented timely

⁵⁷ HODs are the written decisions issued as a result of a due process complaint that proceeded to hearing. Many other complaints are withdrawn for a number of reasons, including settlement. Not all outcomes are required to be tracked; thus, for the purposes of charter reviews and renewals, DC PCSB reports only on HODs that resulted in a finding of noncompliance against the LEA.

⁵⁸ This is the date the Office of Dispute Resolution transmits the HOD to the database a few days after the hearing officer has issued a decision.

⁵⁹ An HOD may be implemented timely, implemented untimely, or not implemented and untimely

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.⁶⁰

DC PCSB has assessed Children's Guild PCS's financial performance by reviewing the previous three years of audited financials and DC PCSB's Financial Analysis Report (FAR), dating from FY 2016 (the first year of operations) through FY 2018. DC PCSB also reviewed the school's unaudited financials for FY 2019 and incorporated this data when relevant. For the purpose of this report, DC PCSB used the FY 2018 FAR Report's benchmarks to assess the financial strength of these individual measures. These 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 a school's metrics fall below the established targets, they are reviewed collectively to identify and assess the areas of financial risks presented. Further, metrics that fall below the established floors are reviewed to determine whether they pose more imminent 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	
Black Text	▪ Within an average, financially healthy range based on the FAR and general finance principles.
Red Text	▪ Falling within a range that 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

Children's Guild PCS has demonstrated healthy 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.

As is frequently the case for new schools, Children's Guild PCS's measures of liquidity, leverage, and primary reserves were below DC PCSB's targets in the school's first years of operation. These measures have improved each year: the current ratio improved from 0.7 in FY 2016 to 1.8 in FY 2019; the number of days of cash on hand increased from just 7 days in

⁶⁰ See D.C. Code § 38-1802.13(b).

FY 2016 to 34 days in FY 2019; primary reserves improved from (2.7%) in FY 2016 to 7.4% in FY 2019; and the school's debt ratio declined from 1.04 in FY 2016 to 0.9 in FY 2019. Children's Guild PCS has no long-term debt but does have a significant deferred rent obligation. This deferred obligation has allowed the school to generate positive cash flows but has resulted in relatively high leverage. The level of leverage will decline to the extent that the school continues to generate operating surpluses and build reserves.

Financial Overview

Overall, the school has exhibited healthy financial performance, while exhibiting appropriate fiscal responsibility. The following table provides an overview of Children's Guild PCS's financial information between FY 2016 and FY 2019. Children's Guild PCS's enrollment grew from FY 2016 to FY 2018 but was essentially unchanged in FY 2019. While the school has consistently generated operating surpluses, growth in enrollment is essential for long-term viability.

Financial Highlights (\$ in 000s)				
	2015-16	2016-17	2017-18	2018-19*
Maximum Enrollment⁶¹	450	550	650	750
Audited Enrollment	326	342	375	376
Total Revenue	\$9,040	\$10,672	\$13,018	\$13,531
Surplus/(Deficit)⁶²	\$187	\$261	\$715	\$238
Unrestricted Cash Balances	\$151	\$418	\$1,113	\$1,198
Number of Days of Cash on Hand⁶³	7	15	34	34
Net Asset Position⁶⁴	\$(235)	\$26	\$741	\$979
Primary Reserve Ratio⁶⁵	-2.7%	0.2%	6.0%	7.4%

* Based on unaudited FY 2019 financial statements.

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 has improved significantly since operations began in FY 2016; costs are effectively managed; and the internal control environment appears to be strong. These areas are discussed further below.

⁶¹ 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.

⁶² Surplus / (Deficit) is total revenue minus total expenses.

⁶³ 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.

⁶⁴ Net Asset Position equals total assets minus total liabilities.

⁶⁵ Primary Reserve Ratio equals total net assets, less intangible assets, divided by total annual expenses.

Liquidity

Liquidity						
	Floor	Target	2015-16	2016-17	2017-18	2018-19*
Current Ratio	0.7	1.0	0.7	0.8	1.5	1.8
Number of Days of Cash on Hand	15	45	7	15	34	34

*FY 2018-19 financial data represents metrics calculated from unaudited financial statements provided by the LEA

Liquidity refers to the school's ability to meet its immediate financial obligations. DC PCSB measures liquidity by assessing two metrics—the Current Ratio⁶⁶ and Days of Cash on Hand⁶⁷—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 was below DC PCSB's target of 1.0 in FY 2016 and FY 2017, but has improved in FY 2018 and FY 2019, meaning the school has the means to meet obligations that will come due in the next year; this trend reflects a positive trajectory in the school's fifth year of operations.

Days of Cash on Hand: This measure approximates how many days of expenses a school can meet with the cash it has in the bank. While days of cash on hand is below DC PCSB's target, it has improved significantly between FY 2016 and FY 2018. If there is no deterioration in this measure, current levels of cash on hand are not an immediate cause for concern given the upward trend in financial performance.

Solvency: The final measure of liquidity is solvency,⁶⁸ 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. DC PCSB reviewed Children's Guild PCS's FY 2018 audited financial statements to determine the risk to third parties in the event of school closure. Should the DC PCSB Board vote to close Children's Guild PCS, it is likely that the school would not be able to pay its deferred rent obligation. This risk of insolvency is mitigated to the extent that the school continues to generate surpluses and build reserves.

⁶⁶ A school's current ratio is its current assets divided by current liabilities.

⁶⁷ Days of Cash on Hand is the amount of unrestricted cash and cash equivalents divided by daily operating expenses, excluding depreciation & amortization.

⁶⁸ Except when the school owns a facility, solvency equals unrestricted cash plus receivables with a high probability of collection, minus liabilities and closure expenses.

Debt Burden

Debt Burden						
	Floor	Target	2015	2016	2017	2018
Debt Ratio	0.9	0.5	N/A – metric introduced in FY 2016	1.0	1.0	0.9
Debt Service Coverage Ratio	1.0	1.2		N/A	N/A	N/A

Based upon DC PCSB's assessment, there are no concerns related to Children's Guild PCS's debt burden. DC PCSB reviews two ratios related to debt management—the debt ratio⁶⁹ and the debt service coverage ratio (DSC).⁷⁰

Debt Ratio: The school's leverage exceeded DC PCSB's target in FY 2016 and FY 2017 and was at the "floor" of acceptable performance in FY 2018. High leverage is not unusual in the early years of a school's operation. This measure will continue to improve if the school continues to generate operating surpluses.

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. Children's Guild PCS has no long-term debt, so this measure is not applicable.

Cost Management

Components of Expenses (\$ in 000s)			
	2016	2017	2018
Salaries and Benefits	\$3,740	\$5,047	\$5,733
Direct Student Costs	\$1,955	\$1,953	\$2,056
Occupancy Expenses	\$1,676	\$1,702	\$1,833
General Expenses⁷¹	\$1,372	\$1,709	\$2,681

As a Percent of Expenses				
	2016	2017	2018	FY18 Sector Median
Salaries and Benefits	43%	48%	47%	62%
Direct Student Costs	22%	19%	17%	11%
Occupancy Expenses	19%	16%	15%	16%
General Expenses	16%	16%	22%	11%

The tables above provide an overview of the school's spending decisions over the past five years. Because the school uses a school management organization for management and administrative services, the proportion of expenses paid for salaries is lower, and the

⁶⁹ Debt Ratio equals the total liabilities divided by the total assets.

⁷⁰ 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).

⁷¹ 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.

proportion of expenses paid for general expenses is higher than the median for all DC charter schools.

Internal Controls

Audits of Children's Guild 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 weaknesses identified in internal controls over financial reporting. Based on this assessment, Children's Guild PCS appears to have an adequate internal control environment.

Internal Controls			
	2016	2017	2018
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
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
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
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
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
Findings & Questioned Costs. The auditor discloses audit findings that are important enough	0	0	0

Internal Controls			
	2016	2017	2018
to merit attention by those charged with governance, with documentation of corrective action plans noting the responsible party.			
Unresolved Prior Year Findings. The auditor discloses prior year audit findings that have not been corrected.	0	0	0
Going-Concern Issue. The auditor indicates that the financial strength of the school is questioned.	No	No	No
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

ECONOMIC VIABILITY

Considering earnings, cash flows, reserves, and trends in both enrollment and revenue, DC PCSB staff has no concerns about Children's Guild PCS's economic viability. The school has consistently generated operating surpluses and positive cash flow.

(\$ in 000s)	Floor	2016	2017	2018	2019*
Surplus/(Deficit)	<0	\$187	\$261	\$715	\$238
Earnings before Depreciation and Amortization	<0	\$528	\$707	\$1,226	\$660

*FY 2018-19 financial data represents metrics calculated from unaudited financial statements provided by the LEA

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 surpluses for the year.⁷² The decline in the school's operating surplus directly related to a decline in enrollment in FY 2018 and related funding, which has subsequently been restored. Trends in enrollment are considered in the section of the report below.

Children's Guild PCS has consistently had positive earnings in each of the past four fiscal years, indicating that the school effectively manages expenses relative to revenues.

(\$ in 000s)	Floor	Target	2016	2017	2018	2019*
Net Asset Position	\$ 0	N/A	(\$235)	\$26	\$741	\$979
Primary Reserve Ratio	0%	25%	(2.7%)	0.2%	6.0%	7.4%

*FY 2018-19 financial data represents metrics calculated from unaudited financial statements provided by the LEA

⁷² EBDA is the change in net assets plus depreciation and amortization.

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. As depicted above, Children's Guild PCS's net assets were negative after the school's first year of operations. Since then, the school's net assets have continued to grow. At the end of FY 2019, net assets totaled nearly \$1M, all of which is working capital, indicating the school's ability to draw on this amount to meet any additional obligations.

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. While this ratio was negative in FY 2016, it has steadily improved each year.

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 is likely to remain financially stable, barring extraordinary circumstances.

(\$ in 000s)	Enrollment over Time			
	2016	2017	2018	2019*
Enrollment Ceiling	450	550	650	750
Enrollment	326	342	375	376
Growth in Enrollment	N/A	5%	10%	0%
Total Revenue	\$9,040	\$10,672	\$13,018	\$13,531
Growth in Revenues	N/A	18%	22%	4%

*FY 2018-19 financial data represents metrics calculated from unaudited financial statements provided by the LEA

Children's Guild PCS's enrollment grew 15% between FY 2016 and FY 2018, and was essentially unchanged in FY 2019. Current levels of enrollment indicate that the school has been able to attract and retain a sufficient number of students to ensure fiscal viability even though the school's enrollment did decline this year. Further declines in enrollment would, however, be a cause for concern.

Revenue grew by 50% between FY 2016 and FY 2019, primarily due to increases in enrollment, adjustments to student funding weights, and additional revenue sources.