



Lea Crusey
Board Chair

Michelle J. Walker-Davis, Ed.D.
Executive Director

March 21, 2024

Via Electronic Mail

Derrick Mashore
Board Chair

Will Stoetzer
Chief Executive Officer

Ingenuity Prep Public Charter School
4600 Livingston Road SE
Washington, DC 20032

Re: 10-Year Charter Review of Ingenuity Prep Public Charter School

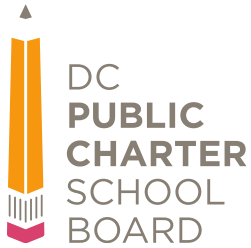
Dear Mr. Mashore and Mr. Stoetzer:

As you know, the DC Public Charter School Board (DC PCSB) must conduct a high-stakes review of a public charter school at least once every five years to determine whether the school's charter should be continued or revoked.¹ During the 2022-23 school year, DC PCSB conducted such a review of Ingenuity Prep Public Charter School (Ingenuity Prep PCS). DC PCSB staff prepared a comprehensive review report to assess the performance of the school according to the standard required by the School Reform Act.²

On January 31, 2023, DC PCSB provided the school with a draft version of this report and allowed an opportunity for the school to respond. DC PCSB considered the school's feedback and incorporated it where staff determined appropriate to create a preliminary charter review report. Based on the findings in the preliminary charter review report, staff developed a proposal to present before the DC PCSB Board recommending the school's charter be continued.

¹ See DC Code § 38-1802.12(a)(3).

² See DC Code § 38-1802.13(a)-(b).



Lea Crusey
Board Chair

Michelle J. Walker-Davis, Ed.D.
Executive Director

At its public board meeting on February 27, 2023, the DC PCSB Board voted to continue the school's charter for the reasons outlined in the review report and accompanying proposal, incorporating and adopting the staff's findings and recommendations.

Representatives from the school were in attendance at the meeting and were provided an opportunity to address the DC PCSB Board prior to this vote. Members of the public were also allowed an opportunity to provide public comment prior to the vote.

Please see the following signed copy of the accompanying staff proposal, which outlines the basis upon which the DC PCSB Board voted to continue the school's charter along with the finalized version of the charter review report.

Thank you for your continued efforts in service of the students of the District of Columbia.

Sincerely yours,

A handwritten signature in black ink that reads "Lea Crusey".

Lea Crusey
Board Chair

A handwritten signature in black ink that reads "Michelle J. Walker-Davis".

Michelle J. Walker-Davis, Ed.D.
Executive Director

Cc: School Leaders

DISTRICT OF COLUMBIA PUBLIC CHARTER SCHOOL BOARD

<p>Charter Actions Requiring a Vote</p> <ul style="list-style-type: none"><input type="checkbox"/> Approve a Charter Application (15 yrs)<input type="checkbox"/> Approve a Charter Renewal (15 yrs)<input checked="" type="checkbox"/> Approve Charter Continuance<input type="checkbox"/> Approve a Charter Amendment Request<input type="checkbox"/> Give a Charter Notice of Concern<input type="checkbox"/> Lift the Charter Notice of Concern<input type="checkbox"/> Commence Charter Revocation Proceedings<input type="checkbox"/> Revoke a Charter<input type="checkbox"/> Board Action, Other _____ <p>Policies</p> <ul style="list-style-type: none"><input type="checkbox"/> Open a New Policy or Changes to a Policy for Public Comment<input type="checkbox"/> Approve a New Policy<input type="checkbox"/> Approve an Amendment to an Existing Policy	<p>Non-Voting Board Items</p> <ul style="list-style-type: none"><input type="checkbox"/> Public Hearing Item<input type="checkbox"/> Discussion Item<input type="checkbox"/> Read into Record
---	--

PREPARED BY: Nada Mousa, Senior Specialist, School Performance Department

SUBJECT: Charter Review: Ingenuity Prep Public Charter School

DATE: February 27, 2023

Recommendation

District of Columbia Public Charter School Board (DC PCSB) staff recommends that its Board vote to continue the charter of Ingenuity Prep Public Charter School (PCS). This recommendation aligns with DC PCSB’s Strategic Roadmap Priority of Excellent Schools.¹

Charter Review Findings

DC PCSB staff conducted a 10-year charter review of Ingenuity Prep PCS, as required by the School Reform Act (SRA).² The review includes an evaluation of the school's 1) progress toward meeting its goals and academic achievement expectations (charter goals); 2) compliance with its charter and applicable federal and local laws; and 3)

¹ DC PCSB is creating the policy and conditions to support a network of public charter schools in Washington, DC, offering families quality, equity, and diverse educational choices. See the Strategic Roadmap here: <https://bit.ly/3EVeKYg>.

² D.C. Code §§ 38-1802 *et seq.*

fiscal management. The chart below summarizes DC PCSB staff's findings in these three areas over the review period.

Charter Review Findings					
Review Period	School year (SY) 2017 – 18 through SY 2021 – 22				
Charter Goals	Ingenuity Prep PCS met its charter goals.				
Compliance	Ingenuity Prep PCS did not violate the law or materially violate its charter.				
Finance	Ingenuity Prep PCS did not commit fiscal mismanagement.				
Performance Management Framework (PMF) Outcomes					
2017 – 18	2018 – 19	2019 – 20	2020 – 21	2021 – 22	Average
52.1%	56.8%	Not Applicable (NA) ³			54.5%

Ingenuity Prep PCS adopted the PMF as its charter goals, in accordance with DC PCSB's *Elect to Adopt the PMF as Charter Goals Policy (PMF as Goals Policy)*.⁴ In doing so, Ingenuity Prep PCS committed to achieving an average PMF score equal to or exceeding 45.0% at its 10-year review. As the chart above reports, Ingenuity Prep PCS met its charter goals, earning above the targeted PMF average during the review period.

DC PCSB staff also found the school has not committed a violation of law or a material violation of its charter, and has not committed fiscal mismanagement, meaning the school has adhered to generally accepted accounting principles, has not engaged in a pattern of fiscal mismanagement, and is economically viable.

DC PCSB staff's complete findings are detailed in the school's Preliminary Charter Review Report (Attachment A), which forms the basis of staff's recommendation along with this proposal. The report will be finalized following the Board's vote on the school's continuance.

³ As written in DC PCSB's *COVID-19 Impact Policy*, the "COVID-19 public health emergency resulted in all DC public charter schools physically closing and implementing distance learning programs." Consequently, per the policy, DC PCSB ceased collection, aggregation, and publication of SY 2019 – 20 academic data and did not produce the SY 2019 – 20 PMF. Similarly, though DC PCSB resumed collection of a limited set of SY 2020 – 21 PMF data, it did not produce the SY 2020 – 21 PMF. In September 2021, DC PCSB announced its plan to develop a new accountability framework. Consequently, DC PCSB did not produce the SY 2021 – 22 PMF. For details, see the *COVID-19 Impact Policy* here: <https://bit.ly/3fy5zDo>. Also see DC PCSB's September 2021 public meeting materials and recorded discussion here: <https://bit.ly/3JpiB2x>.

⁴ See the *PMF as Goals Policy* here: <https://bit.ly/2PTj7fL>.

Additional Academic Data

To support evaluation during the COVID-19 recovery period, DC PCSB staff collected SY 2021 – 22 transitional goals data from all schools.⁵ For schools serving early childhood and elementary students like Ingenuity Prep PCS,⁶ transitional goals data includes the following outcomes: growth on a nationally normed assessment, Partnership for Assessment of Readiness for College and Careers (PARCC) proficiency, achievement on early childhood assessments, attendance, re-enrollment, and Classroom Assessment Scoring System (CLASS). See Ingenuity Prep PCS's SY 2021 – 22 transitional goals performance on pages 23 through 25 of the attached Preliminary Charter Review Report. Per the *COVID-19 Impact Policy*, DC PCSB uses SY 2021 – 22 transitional goals data as supplemental evidence of school performance, but only if it helps the school.⁷

In addition to collecting transitional goals data, DC PCSB staff conducted a Qualitative Site Review (QSR) at Ingenuity Prep PCS during SY 2021 – 22. DC PCSB uses the QSR to evaluate schools' environment and instructional quality. Like transitional goals data, QSR outcomes provide supplemental evidence of school quality. See Ingenuity Prep PCS's SY 2021 – 22 QSR performance on pages 10 through 12 of the attached Preliminary Charter Review Report.

Charter Review Standard

The SRA stipulates that DC PCSB "shall review [a school's] charter at least once every [five] years."⁸ 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.⁹

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 continuance.¹⁰

⁵ See DC PCSB's transitional goals description in the *COVID-19 Impact Policy*, <https://bit.ly/3JCFwIQ>, p. 2.

⁶ In this context, "early childhood" refers to pre-kindergarten 3 and pre-kindergarten 4.

⁷ See the *COVID-19 Impact Policy*, <https://bit.ly/3JCFwIQ>, p. 6.

⁸ D.C. Code § 38-1802.12(a)(3).

⁹ D.C. Code § 38-1802.13(a).

¹⁰ DC PCSB may impose conditions of continuance if it deems such conditions appropriate.

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.¹¹

Background

Ingenuity Prep PCS began operation in 2013 under authorization from DC PCSB. The school currently educates 785 students in pre-kindergarten 3 through eighth grade at one campus located in Ward 8.¹² Per its mission, Ingenuity Prep PCS aims to be “a supportive school community dedicated to academic rigor and civic leadership, preparing students for the path to the colleges and careers of their choosing.”

Notification

On January 9, 2023, DC PCSB staff notified Advisory Neighborhood Commissioner Sandra Harrell (8D03) of the school's 10-year charter review. DC PCSB staff also posted a notice for public comment on the charter review in the DC Register and on the DC PCSB website.¹³

Attachment to this Proposal

Attachment A: Ingenuity Prep PCS 10-Year Preliminary Charter Review Report

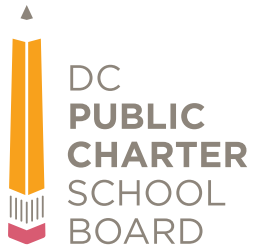
Date: <u>2/27/2023</u>
DC PCSB Action: <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Approved with Changes <input type="checkbox"/> Rejected
Changes to the Original Proposal:

Signature of the DC PCS Board Chair: 

¹¹ D.C. Code § 38-1802.13(b).

¹² This enrollment figure is based on preliminary, unvalidated data as of October 5, 2022.

¹³ See the notice here: <https://bit.ly/3WBSOKT>.



2022 – 23 10-Year Charter Review Report Ingenuity Prep Public Charter School

February 27, 2023

DC Public Charter School Board
3333 14th Street NW, Suite 210
Washington, DC 20010
(202) 328-2660
www.dcpccb.org

TABLE OF CONTENTS

BOARD VOTE AND KEY FINDINGS.....	2
SCHOOL BACKGROUND	4
CHARTER REVIEW STANDARD	15
SECTION ONE: GOALS AND ACADEMIC ACHIEVEMENT EXPECTATIONS	16
SECTION TWO: COMPLIANCE WITH CHARTER AND APPLICABLE LAWS.....	27
SECTION THREE: FISCAL MANAGEMENT AND ECONOMIC VIABILITY.....	38

BOARD VOTE AND KEY FINDINGS¹

Ingenuity Prep Public Charter School (PCS) ^{2, 3}					
Review or Renewal	10-year charter review				
Review Period	School year (SY) 2017 – 18 through SY 2021 – 22				
Charter Goals	Ingenuity Prep PCS met its charter goals.				
Compliance	Ingenuity Prep PCS did not violate the law or materially violate its charter.				
Finance	Ingenuity Prep PCS did not commit fiscal mismanagement.				
Board Vote	The Board has voted 6 – 0 to continue Ingenuity Prep PCS's charter.				
Performance Management Framework (PMF) Outcomes ⁴					
2017 – 18	2018 – 19	2019 – 20	2020 – 21	2021 – 22	Average
52.1%	56.8%	Not Applicable (NA) ⁵			54.5%

Pursuant to the School Reform Act (SRA), the DC Public Charter School Board (DC PCSB) "shall review [a school's] charter at least once every [five] years."⁶ As such, DC PCSB conducted a 10-year review of Ingenuity Prep PCS, evaluating its progress toward meeting its goals and academic achievement expectations (charter goals). Ingenuity Prep PCS adopted the PMF as its charter goals, in accordance with DC PCSB's *Elect to Adopt the PMF as Charter Goals Policy (PMF as Goals Policy)*. In doing so, Ingenuity Prep PCS committed to achieving an average PMF score equal to or exceeding 45.0% at its 10-year review. As the chart above reports, Ingenuity Prep PCS met its goals, earning above the targeted PMF points throughout the review period.

DC PCSB also evaluated the school's compliance with applicable federal and local laws, compliance with its charter, and fiscal management. DC PCSB determined the school has not committed a violation of law or a material violation of its charter, has adhered to generally accepted accounting principles (GAAP), has not engaged in a pattern of fiscal mismanagement, and is economically viable.

¹ To request a text-only and/or a black and white version of this report, please contact communications@dcpcs.org.

² See the appendices to this report here: <https://bit.ly/3kKO30W>.

³ See Ingenuity Prep PCS's Charter Agreement and Amendments, Appendices A1 – A8.

⁴ See Ingenuity Prep PCS's PMF scorecards, Appendices B1 – B2.

⁵ As written in DC PCSB's *COVID-19 Impact Policy*, the "COVID-19 public health emergency resulted in all DC public charter schools physically closing and implementing distance learning programs." Consequently, per the policy, DC PCSB ceased collection, aggregation, and publication of SY 2019 – 20 academic data and did not produce the SY 2019 – 20 PMF. Similarly, though DC PCSB resumed collection of a limited set of SY 2020 – 21 PMF data, it did not produce the SY 2020 – 21 PMF. In September 2021, DC PCSB announced its plan to develop a new accountability framework. Consequently, DC PCSB did not produce the SY 2021 – 22 PMF. For details, see the *COVID-19 Impact Policy* here: <https://bit.ly/3fy5zDo>. Also see DC PCSB's September 2021 public meeting materials and recorded discussion here: <https://bit.ly/3JpiB2x>.

⁶ D.C. Code § 38-1802.12(a)(3).

At its public board meeting on February 27, 2023, the Board voted 6-0 to continue Ingenuity Prep PCS's charter.

The following report includes a school background section followed by analyses of the school's academic performance, charter and legal compliance, and fiscal management.

SCHOOL BACKGROUND

Ingenuity Prep PCS			
Year Opened	2013 – 14	Ward(s)	8
Number of Campuses	1	Year(s) of Previous Review	2017 – 18
Current Enrollment Ceiling	816	Current Enrollment	785 ⁷
Chartered Grade Span	Pre-kindergarten 3 (PK3) – 8	Current Grade Span	PK3 – 8
Mission Statement			
Ingenuity Prep is a supportive school community dedicated to academic rigor and civic leadership, preparing students for the path to the colleges and careers of their choosing.			

School Overview

Ingenuity Prep PCS began operation in 2013 under authorization from DC PCSB, initially serving students in grades PK3 through kindergarten (K). Since its first year of operation, the school has grown by one grade level per year. The local education agency (LEA)⁸ reached maturation in SY 2021 – 22, serving grades PK3 through 8.

Ingenuity Prep PCS aims to support students' mastery of "rigorous core content and a broader set of 21st-century civic leadership competencies."⁹ In addition to traditional curricula, Ingenuity Prep PCS is building a civic leadership program, focusing on social-emotional literacy, collaborative problem-solving, social justice-focused social studies and science curricula, and service-learning.¹⁰ Ingenuity Prep PCS students participate in a daily social-emotional literacy class, which aims to equip students with skills to process their emotions, work successfully with others, and proactively problem-solve. The LEA offers an extended day and school year in service of its mission.

Enrollment and Demographic Data

The table below shows the school's enrollment history during the review period.¹¹

School Year	2017 – 18	2018 – 19	2019 – 20	2020 – 21	2021 – 22
PK3	75	72	71	59	69
Pre-kindergarten 4 (PK4)	75	76	72	81	69

⁷ This enrollment data is based on preliminary, unvalidated data as of October 5, 2022.

⁸ An "LEA" is any individual or group of public charter schools operating under a single charter.

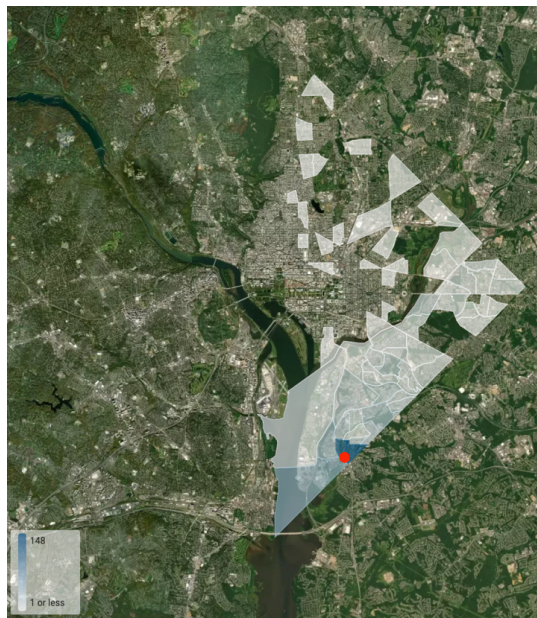
⁹ See Ingenuity Prep PCS's SY 2020 – 21 Annual Report, Appendix C, p. 3.

¹⁰ Ibid.

¹¹ The "-" symbol indicates the school does not or did not enroll students in the corresponding grade(s) or student group(s).

School Year	2017 – 18	2018 – 19	2019 – 20	2020 – 21	2021 – 22
K	70	73	75	81	77
1	71	55	84	78	77
2	69	82	73	84	72
3	68	69	76	71	80
4	68	67	59	86	76
5	-	66	63	67	70
6	-	-	64	74	71
7	-	-	-	75	67
8	-	-	-	-	72
Audited Enrollment¹²	496	560	637	756	800
Enrollment Projections¹³	474	546	641	674	812
Enrollment Ceiling¹⁴	491	565	664	745	816

The map below shows where SY 2021 – 22 Ingenuity Prep PCS students live in relation to the school, which is marked by a red dot. The blue gradient represents the density of students. As the map shows, most Ingenuity Prep PCS students come from Ward 8.



12 The Office of the State Superintendent of Education (OSSE) conducts an annual enrollment audit to determine the number of students at each public school in DC.

13 Each year, charter LEAs, DC PCSB, and the Office of the Deputy Mayor for Education (DME) must project student enrollment for the following school year. The enrollment projections displayed are determined by DME and DC PCSB and may be different than the LEA's projections.

14 Each charter LEA has an enrollment ceiling in its charter agreement, designating the maximum number of students the school can receive per pupil funding for each school year.

The table below shows the LEA's SY 2021 – 22 student demographics.

Student Group	Percentage Enrolled
At-Risk Students¹⁵	73.8%
English Learners¹⁶	0.4%
Students with Disabilities (SWD)¹⁷	15.6%
American Indian or Alaska Native	–
Asian	0.3%
Black or African American	97.6%
Hispanic/Latino	1.6%
Multiracial	–
Native Hawaiian or Other Pacific Islander	0.1%
White	–

School Climate

The charts below report Ingenuity Prep PCS's performance across three school environment measures: out-of-school suspension (OSS) rates, mid-year withdrawal (MYW) rates, and in-seat attendance (ISA) rates. DC PCSB presents these measures by applicable student groups and compares them to the relevant student groups within the DC public charter sector. These data did not factor into DC PCSB's continuance determination. Still, isolating school environment measures by student group helps to identify whether there may be access and opportunity disparities.¹⁸

OSS Rates

An OSS is when a school temporarily removes a student from school grounds for disciplinary reasons. The OSS rate is the percentage of students who received an OSS. The

¹⁵ D.C. Code § 38–2901(2A) defines “at-risk” as a DCPS student or a public charter school student who is identified as one or more of the following: a) homeless; b) in the District’s foster care system; c) qualifies for the Temporary Assistance for Needy Families program or the Supplemental Nutrition Assistance Program; or d) a high school student who is one year older, or more, than the expected age for the grade in which the student is enrolled.

¹⁶ English learners are students whose native language is a language other than English. An English learner may have difficulty speaking, reading, writing, or understanding the English language.

¹⁷ Students with disabilities are students identified as having an Individualized Education Program (IEP). For demographic data, DC PCSB counts any student who was identified as SWD through the year in the final calculation.

¹⁸ The following school climate charts do not include SY 2019 – 20, SY 2020 – 21, or SY 2021 – 22 data in the multi-year average values. The COVID-19 pandemic made these years unique and difficult to compare to other years. Consequently, DC PCSB shares two-year averages (SY 2017 – 18 and SY 2018 – 19) as well as standalone outcomes for SY 2019 – 20, SY 2020 – 21, and SY 2021 – 22 in this section of the report. Additionally, all rates for SY 2019 – 20 include data from August 2019 through February 2020. DC PCSB ceased collecting OSS, MYW, and ISA data after March 2020 in response to the pandemic.

charts below detail Ingenuity Prep PCS's average OSS rates by grade band and student group compared to the DC public charter sector's average OSS rates.¹⁹

Key for OSS and MYW Rates	
Green	Equal to or less than the sector average
Red	More than the sector average
Grey	n < 10; the number of students (n-size) is less than 10 ²⁰

Two-Year (SY 2017 – 18 and SY 2018 – 19) Average OSS Rate				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
Ingenuity Prep PCS	PK3 – PK4	0.0%	n < 10	0.0%
Sector		0.0%	0.0%	0.2%
Ingenuity Prep PCS	K – 5	15.6%	n < 10	22.2%
Sector		7.3%	1.5%	11.0%

SY 2019 – 20 Average OSS Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
Ingenuity Prep PCS	PK3 – PK4	0.0%	0.0%	0.0%
Sector		0.0%	0.0%	0.0%
Ingenuity Prep PCS	K – 5	11.9%	n < 10	17.0%
Sector		3.5%	0.4%	5.2%
Ingenuity Prep PCS	6 – 8	5.3%	n < 10	17.6%
Sector		10.4%	4.6%	13.2%

¹⁹ For SY 2020 – 21, DC PCSB determined the number of students suspended across the charter sector, including Ingenuity Prep PCS, is too small to report.

²⁰ DC PCSB does not report on values when the n-size is less than 10.

SY 2021 – 22 Average OSS Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
Ingenuity Prep PCS	PK3 – PK4	0.0%	n < 10	0.0%
Sector		0.0%	0.0%	0.0%
Ingenuity Prep PCS	K – 5	4.4%	n < 10	14.0%
Sector		2.4%	0.4%	4.0%
Ingenuity Prep PCS	6 – 8	37.2%	n < 10	39.1%
Sector		10.0%	3.9%	9.9%

MYW Rates

The MYW rate is the percentage of students who have withdrawn from school during the school year. The charts below detail Ingenuity Prep PCS's average MYW rates by grade band and student group compared to the DC public charter sector's average MYW rates.

Two-Year (SY 2017 – 18 and SY 2018 – 19) Average MYW Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
Ingenuity Prep PCS	PK3 – PK4	7.4%	n < 10	3.7%
Sector		5.8%	4.2%	4.0%
Ingenuity Prep PCS	K – 5	5.1%	n < 10	6.4%
Sector		4.6%	2.2%	4.0%

SY 2019 – 20 Average MYW Rate				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
Ingenuity Prep PCS	PK3 – PK4	4.2%	n < 10	12.5%
Sector		3.7%	4.7%	2.9%
Ingenuity Prep PCS	K – 5	2.8%	n < 10	3.8%
Sector		2.9%	2.3%	3.1%
Ingenuity Prep PCS	6 – 8	5.3%	n < 10	5.9%
Sector		3.3%	1.4%	3.7%

SY 2020 – 21 Average MYW Rate				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
Ingenuity Prep PCS	PK3 – PK4	3.7%	n < 10	0.0%
Sector		3.6%	3.7%	3.2%
Ingenuity Prep PCS	K – 5	2.2%	n < 10	1.0%
Sector		1.6%	1.4%	1.4%
Ingenuity Prep PCS	6 – 8	3.9%	n < 10	2.6%
Sector		1.2%	1.0%	0.9%

SY 2021 – 22 Average MYW Rate				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
Ingenuity Prep PCS	PK3 – PK4	2.7%	n < 10	5.9%
Sector		6.9%	4.6%	4.1%
Ingenuity Prep PCS	K – 5	3.5%	n < 10	2.3%
Sector		5.0%	2.9%	3.9%
Ingenuity Prep PCS	6 – 8	4.7%	n < 10	6.5%
Sector		4.4%	3.0%	3.7%

ISA Rates

The ISA rate is the percentage of students who were present each day. The charts below detail Ingenuity Prep PCS's data by grade band and student group compared to the DC public charter sector's average ISA rates.

Key for ISA Rates	
Green	Equal to or more than the sector rate
Red	Less than the sector rate
Grey	n < 10; the n-size is less than 10

Two-Year (SY 2017 – 18 and SY 2018 – 19) Average ISA Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
Ingenuity Prep PCS	PK3 – PK4	84.1%	n < 10	90.8%
Sector		87.9%	91.8%	90.4%
Ingenuity Prep PCS	K – 5	87.2%	n < 10	87.0%
Sector		91.4%	94.9%	91.9%

SY 2019 – 20 Average ISA Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
Ingenuity Prep PCS	PK3 – PK4	88.6%	n < 10	90.9%
Sector		88.6%	91.5%	90.3%
Ingenuity Prep PCS	K – 5	90.1%	n < 10	90.7%
Sector		92.3%	94.9%	92.9%
Ingenuity Prep PCS	6 – 8	92.6%	n < 10	92.2%
Sector		92.5%	94.4%	91.9%

SY 2020 – 21 Average ISA Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
Ingenuity Prep PCS	PK3 – PK4	66.2%	n < 10	75.3%
Sector		72.0%	85.1%	79.1%
Ingenuity Prep PCS	K – 5	86.7%	n < 10	88.6%
Sector		85.7%	92.8%	87.8%
Ingenuity Prep PCS	6 – 8	85.1%	n < 10	82.4%
Sector		89.6%	93.5%	90.1%

SY 2021 – 22 Average ISA Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
Ingenuity Prep PCS	PK3 – PK4	76.8%	n < 10	86.8%
Sector		77.5%	85.6%	81.7%
Ingenuity Prep PCS	K – 5	83.0%	n < 10	85.4%
Sector		81.9%	90.6%	84.8%
Ingenuity Prep PCS	6 – 8	79.7%	n < 10	76.9%
Sector		82.8%	89.8%	84.2%

Qualitative Site Review (QSR)

DC PCSB uses QSR visits to assess schools across two domains—classroom environment and instruction, as defined in the Charlotte Danielson *Framework for Teaching*.²¹ From April 18 – 29, 2022, in anticipation of this review, DC PCSB conducted a QSR at Ingenuity Prep PCS.²² In the classroom environment domain, observers noted that most interactions between teachers and students and among students reflected genuine warmth and care. The QSR team observed students complimenting and helping one another persevere through their work. Across classrooms, teachers expected high levels of student effort, and most demonstrated the belief that students could achieve anything with hard work. In the

²¹ Danielson, Charlotte. *The Framework for Teaching: Evaluation Instrument*. Princeton, NJ: Danielson Group, 2013.

²² See Ingenuity Prep PCS's SY 2021 – 22 QSR Report, Appendix D.

instruction domain, observers noted teachers clearly presented lesson objectives and academic content. Teachers also used various open-ended questions, inviting student participation and thinking throughout lessons. Across classrooms, learning tasks encouraged higher-order thinking, and teachers encouraged multiple approaches to complete assignments.

After conducting unannounced observations,²³ the QSR team rates the classroom environment and instruction as “unsatisfactory,” “basic,” “proficient,” or “distinguished.” The following chart details the percentage of Ingenuity Prep PCS classrooms the QSR team rated as proficient or distinguished in each domain. It also reports the average percentage of comparable public charter school classrooms in SY 2021 – 22 that received proficient and distinguished ratings in each domain.

Campus/Sector	Classroom Environment	Instruction
Percentage Rated Proficient or Distinguished		
Ingenuity Prep PCS	94.0%	84.0%
Average score for pre-kindergarten (PK) – 8 public charter schools	89.0%	80.0%

Ingenuity Prep PCS scored above average in both domains compared to other PK – 8 public charter schools that received a QSR during SY 2021 – 22.

In addition to conducting classroom observations, DC PCSB and The New Teacher Project (TNTP) consultants reviewed sample English language arts (ELA) and math assignments Ingenuity Prep PCS students received. Evaluators used TNTP’s *Assignment Review Protocol* in assessing whether the assignments: 1) aligned with grade-appropriate standards, 2) provided students with meaningful practice opportunities, and 3) gave students an opportunity to connect academic standards to real-world issues.²⁴ Upon review, evaluators rated each assignment as “sufficient,” “minimal,” or “no opportunity,” describing the opportunity students had to meaningfully engage in worthwhile grade-level content.²⁵

Of the five ELA samples Ingenuity Prep PCS submitted, three assignments received an overall rating of “sufficient.” These assignments were based on high-quality, grade-appropriate texts and contained a task that reached the depth of the grade-level standards. One assignment received an overall rating of “minimal.” This assignment did not

²³ During SY 2021 – 22 QSR visits, the QSR team observed 50.0% of a school’s core content classes. The QSR team also observed electives when the coursework was an essential part of the school’s mission.

²⁴ See the protocol here: <https://bit.ly/3PfYLKH>.

²⁵ Specifically, assignments that satisfied TNTP’s *Assignment Review Protocol* criteria were deemed “sufficient.” Assignments that partially satisfied the criteria were deemed “minimal.” Assignments that did not satisfy the criteria were deemed “no opportunity.”

fully align to grade-level standards and yielded surface-level comprehension. One assignment received an overall rating of “no opportunity.” This assignment was generally text-dependent and did not focus students on key ideas from the text, resulting in surface-level comprehension.

Of the five math samples Ingenuity Prep PCS submitted, all five assignments received an overall rating of “sufficient.” These assignments reached the depth of the targeted grade-level standard and allowed students to engage in mathematical practices at the appropriate level of rigor. Three assignments did not allow students to apply math to the real world in a meaningful way.

Notice of Concern

In May 2018,²⁶ Ingenuity Prep PCS received a Notice of Concern in response to the school’s 36.7% truancy rate. In September 2018, the DC PCSB Board lifted the Notice of Concern though the school “did not show enough [attendance] improvement during SY 2017 – 18.”²⁷ However, per DC PCSB’s *Attendance and Truancy Policy*, the Board lifted the Notice of Concern “in order for the school to start fresh the next school year.”²⁸

In March 2019,²⁹ Ingenuity Prep PCS received a Notice of Concern in response to the school’s 37.6% truancy rate. In May 2019, the DC PCSB Board lifted the Notice of Concern because the school improved its attendance rates.

Previous Charter Reviews

Five-Year Review

In SY 2017 – 18,³⁰ DC PCSB conducted a five-year review of Ingenuity Prep PCS and found the school met the standard for charter continuance. The school met its charter goals, earning a PMF average of 60.7% compared to the target of 40.0%. In November 2017, DC PCSB voted to continue the school's charter.

Communication with the School

In February 2020,³¹ members of the DC PCSB Board and staff met with Ingenuity Prep PCS board members and staff to discuss the school’s community complaints and special education (SPED) compliance issues. At that time, the school had received 13 community complaints to date in SY 2019 – 20, primarily focused on services for SWD. During the meeting, the school shared that it recently adjusted its SPED program, and that implementation was challenging. The school also noted that its SPED team was

26 See DC PCSB’s May 2018 Ingenuity Prep PCS Notice of Concern Proposal, Appendix E.

27 See DC PCSB’s September 2018 Ingenuity Prep PCS Lift Notice of Concern Proposal, Appendix F, p. 1.

28 See DC PCSB’s *Attendance and Truancy Policy* here: <https://bit.ly/3HF8hWg>, p. 2.

29 See DC PCSB’s March 2019 Ingenuity Prep PCS Lift Notice of Concern Proposal, Appendix G.

30 See Ingenuity Prep PCS’s Five-Year Review Report, Appendix H.

31 See DC PCSB’s March 2020 follow-up letter to Ingenuity Prep PCS, Appendix I.

understaffed following a series of resignations. Consequently, only two educators were available to provide specialized instruction for 36 SWD. Ingenuity Prep PCS then reported its progress filling vacant SPED teaching positions, including hiring a Special Education Vice Principal. DC PCSB recommended the LEA update its internal policies to ensure the school accurately implemented its SPED procedures. Finally, Ingenuity Prep PCS described a six-week turnaround plan it was implementing to improve school climate.

In June 2022, DC PCSB staff met with Ingenuity Prep PCS staff to discuss the school's 10-year review. DC PCSB staff provided the school with a chart, similar to the one in Section One of this report, showing the school's charter goals performance during the review period.

CHARTER REVIEW STANDARD

The SRA stipulates that DC PCSB "shall review [a school's] charter at least once every [five] years."³² 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.³³

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 continuance.³⁴

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 GAAP, 2) has engaged in a pattern of fiscal mismanagement, and/or 3) is no longer economically viable.³⁵

32 D.C. Code § 38-1802.12(a)(3).

33 D.C. Code § 38-1802.13(a).

34 DC PCSB may impose conditions of continuance if it deems such conditions appropriate.

35 D.C. Code § 38-1802.13(b).

SECTION ONE: GOALS AND ACADEMIC ACHIEVEMENT EXPECTATIONS

Per the SRA, DC PCSB must review whether a school has met its charter goals at least once every five years. Charter goals are part of the review analysis only if they were included in a school's charter or charter amendment.

In June 2020,³⁶ Ingenuity Prep PCS adopted the latest iteration of the PMF as its charter goals. In doing so, the school agreed to the review standard and provisions recorded in the chart below. This chart also reports DC PCSB's determination that Ingenuity Prep PCS met its charter goals.

Charter Goals	Met?
<p>Review Standard: At its tenth-year charter review, obtains an average PMF score for school years 2017 – 18, 2018 – 19, 2020 – 21, and 2021 – 22 equal to or exceeding 45.0%.</p> <p>In cases where a campus has not achieved the above thresholds, the DC PCSB Board may, at its discretion, determine that a school has met its goals and student achievement expectations if the School Corporation has met either or both of the following:</p> <p>Improvement Provision: The School Corporation has demonstrated consistent improvement on overall PMF scores during the most recent three years of the review period. In exercising its discretion, the DC PCSB Board shall also consider the strength of un-tiered measures.³⁷</p> <p>Demonstrated Promise Provision: At charter renewal, the school has earned a PMF score equal to or exceeding 50 in the most recent year of the PMF (the last year of the review period); OR the school's rating on OSSE's School Transparency and Reporting Framework for the most recent year is a 3 or above.</p>	Met

PMF Outcomes ³⁸					
2017 – 18	2018 – 19	2019 – 20	2020 – 21	2021 – 22	Average
52.1%	56.8%	NA ³⁹			54.5%

³⁶ See Ingenuity PCS's Goals Charter Amendment, Appendix A7.

³⁷ "Un-tiered measures" refers to measures included in the PMF that do not count in the PMF score and resulting tier.

³⁸ See Ingenuity Prep PCS's PMF Scorecards, Appendices B1 – B2.

³⁹ DC PCSB ceased collection, aggregation, and publication of SY 2019 – 20 academic data. Though DC PCSB resumed collection of a limited set of PMF data in SY 2020 – 21 and SY 2021 – 22, it did not produce the PMF in either year. Consequently, DC PCSB assesses schools under review in SY 2022 – 23 using data prior to the COVID-19 pandemic. For details, see the *COVID-19 Impact Policy* here: <https://bit.ly/3fy5zDo>.

Determination: Ingenuity Prep PCS met its charter goals, exceeding the targeted 45.0% PMF average.

The remainder of this section contains a description of the PMF and an analysis of Ingenuity Prep PCS’s performance on measures in each PMF category during the review period, excluding school years 2019 – 20, 2020 – 21, and 2021 – 22 per footnote 39. This section ends with supplemental academic data, separate and apart from the school’s charter goals.

PMF Overview⁴⁰

DC PCSB evaluates all public charter schools according to a PMF. There are four separate PMF frameworks; DC PCSB evaluates Ingenuity Prep PCS under the Early Childhood, Elementary School, and Middle School PMF (PK – 8 PMF). DC PCSB divides the PMF into four categories: student progress, student achievement, gateway, and school environment. Using a 100-point scale, the PK – 8 PMF identifies schools as Tier 1 (high-performing), Tier 2 (mid-performing), or Tier 3 (low-performing) based on their overall performance in the four categories. See below for a summary of Ingenuity Prep PCS’s outcomes in the PMF categories, including charts detailing the school's performance compared to the sector.⁴¹

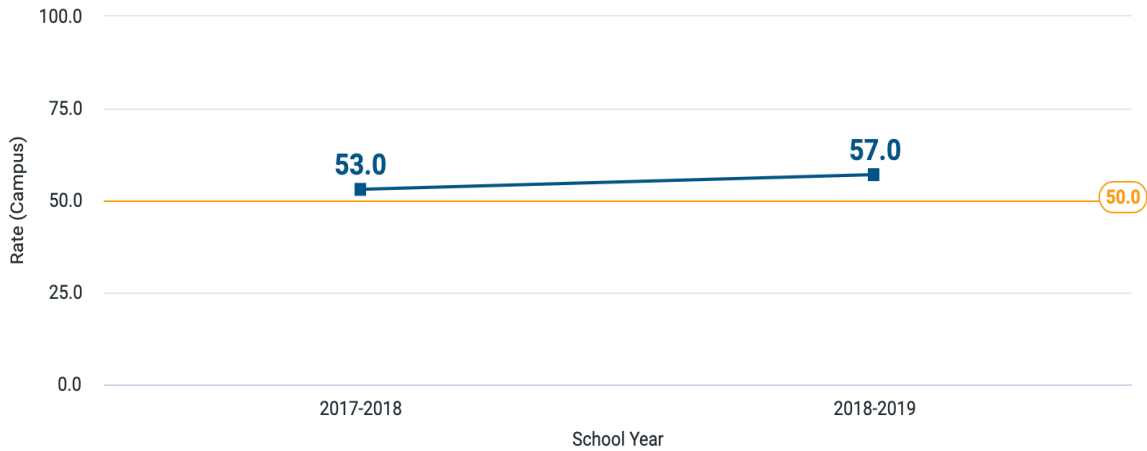
Student Progress

Student progress is a measure of student growth over the course of a year. For schools ending in grades 4 – 8, DC PCSB uses the median growth percentile (MGP) on the Partnership for Assessment of Readiness for College and Careers (PARCC), DC's state assessment, as the growth measure. An MGP of 50 indicates that a school's students have average year-to-year growth compared to other DC students in the same grades and with the same initial state assessment performance. The charts below detail the school's MGP performance compared to the standard of 50.

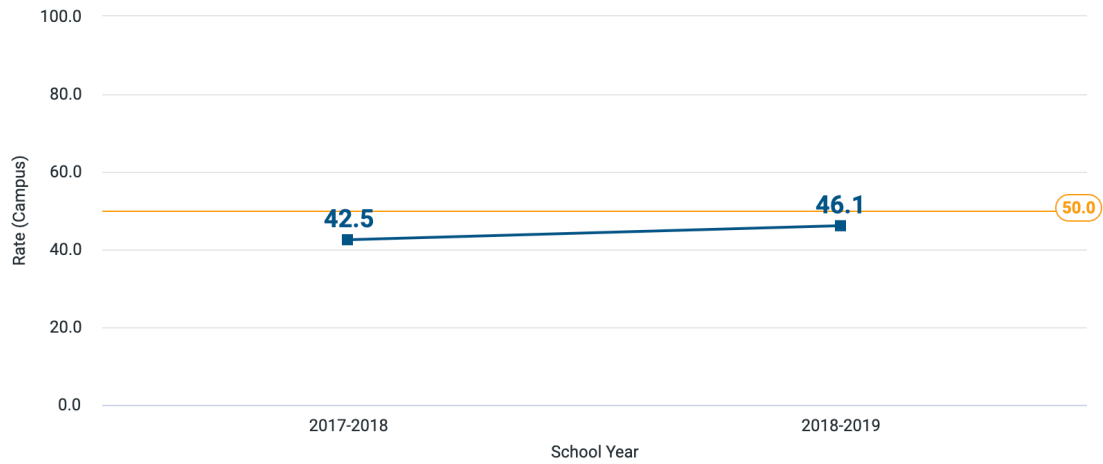
40 For details, see the 2019 – 20 PMF Policy and Technical Guide here: <https://bit.ly/2D2lvqc>.

41 The phrase “compared to the sector” here and throughout this section of the report refers to the average performance achieved by all DC public charter schools evaluated under the corresponding PMF.

ELA MGP

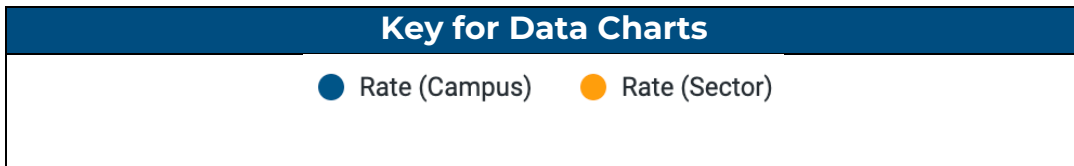


Math MGP



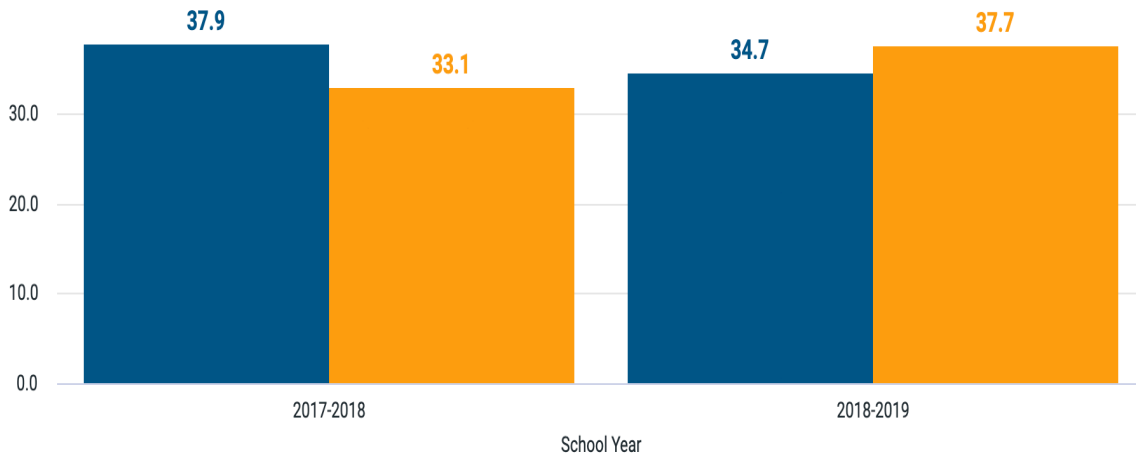
Student Achievement

The student achievement category captures overall student performance on the PARCC assessment, with level 4+ considered proficient and advanced.⁴² This category includes overall performance in both ELA and math as compared to the sector average for students in the same grade band. The charts below detail the school's ELA and math achievement performance compared to the sector.

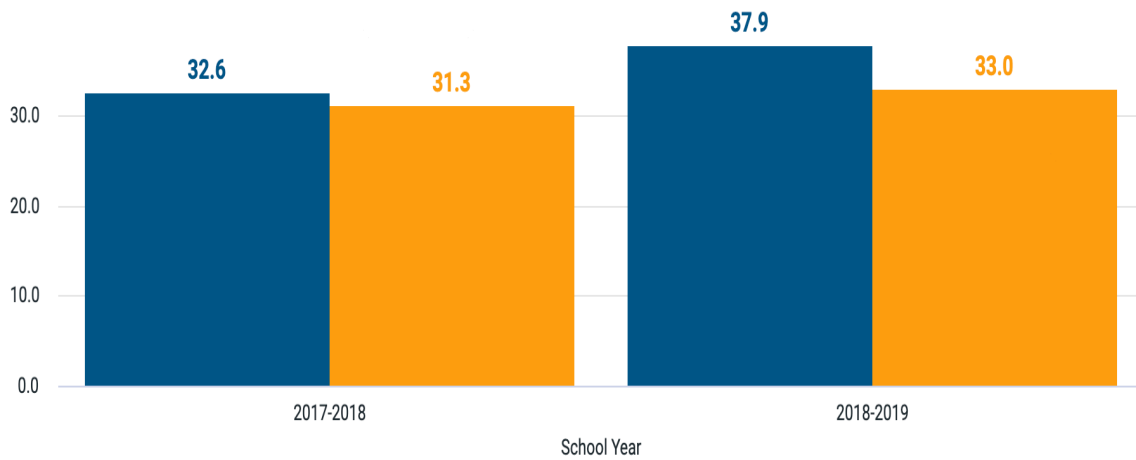


⁴² The term "4+" refers to level 4 and level 5 PARCC scores. A student who earns a level 4 is considered proficient. A student who earns a level 5 is considered advanced.

ELA Proficiency (Overall)



Math Proficiency (Overall)

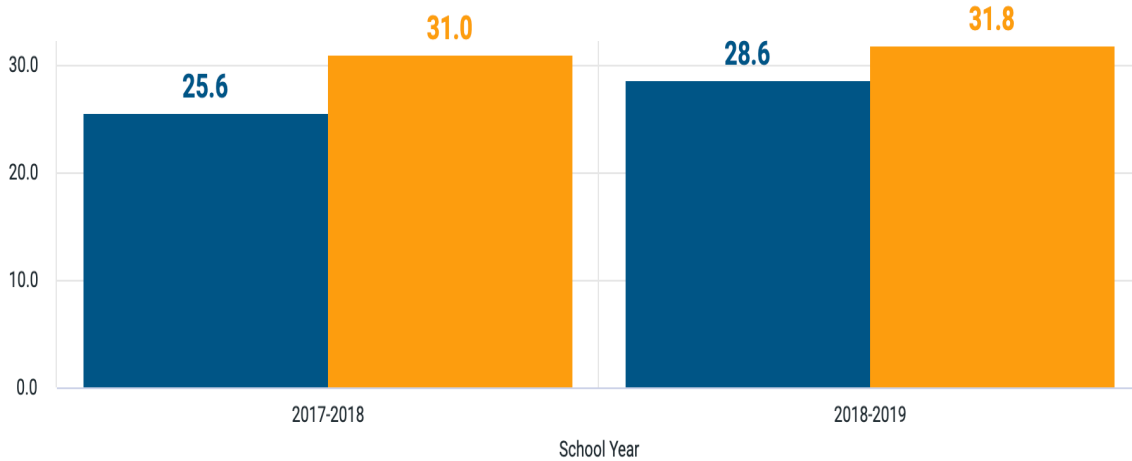


Gateway

The gateway category includes grade-specific measures that predict students' future academic performance. The PK – 8 PMF gateway measure that applies to Ingenuity Prep PCS is described below.

3rd Grade ELA

This measure reports the percentage of 3rd graders who attended the LEA for at least two years who either achieved 4+ scores on the PARCC assessment or earned a 3 or above on the Multi-State Alternate Assessment in ELA. The chart below shows the school's 3rd grade ELA performance compared to the sector.

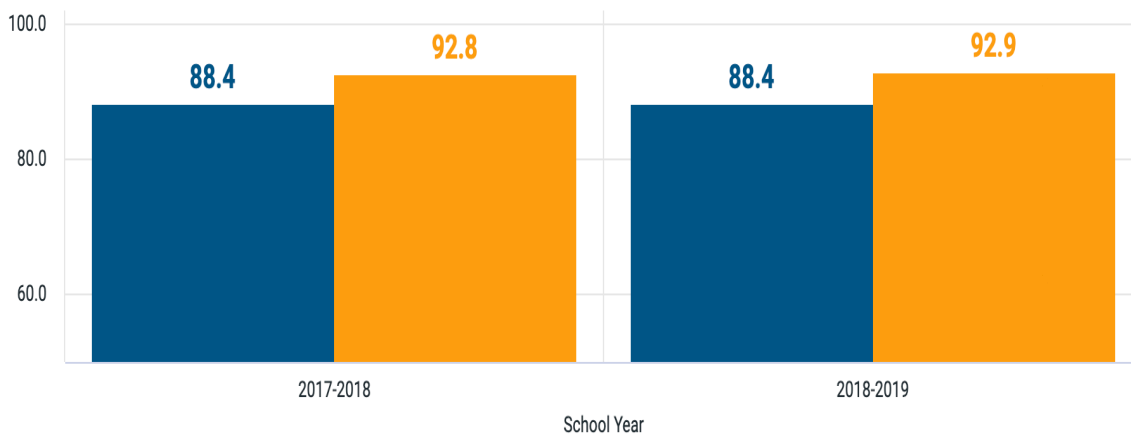


School Environment

The school environment category includes in-seat attendance rates and re-enrollment rates, as well as Classroom Assessment Scoring System (CLASS) scores for schools that serve PK students. Charts detailing the school's performance on each of these measures can be found below. Though DC PCSB resumed collection of a limited set of SY 2020 – 21 and SY 2021 – 22 data, it did not calculate or publicly report any PMF measures, including ISA and re-enrollment.

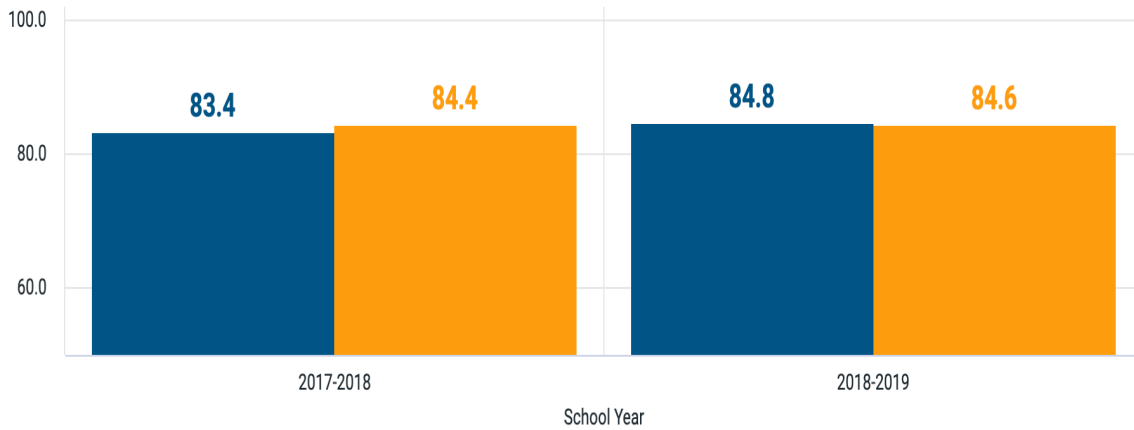
ISA

The ISA rate measures the daily average percentage of enrolled students who were present in school. The chart below details the school's ISA performance compared to the sector.



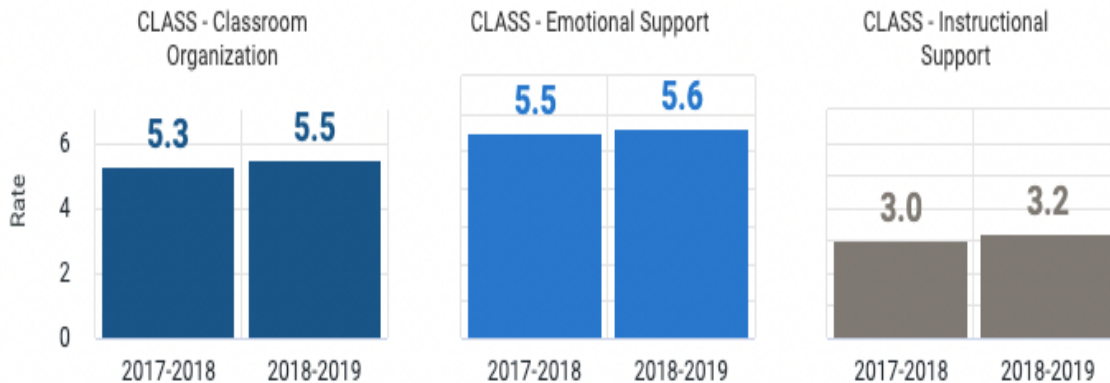
Re-enrollment

The re-enrollment rate measures the percentage of eligible students who return to the school the following year.⁴³ The chart below reports the school's re-enrollment rates compared to the sector.



Classroom Assessment Scoring System (CLASS)

DC PCSB uses CLASS to evaluate PK classrooms.⁴⁴ The chart below displays the school's performance in CLASS each year. Per the publisher's guidance, a high score is a 6.0 or above.



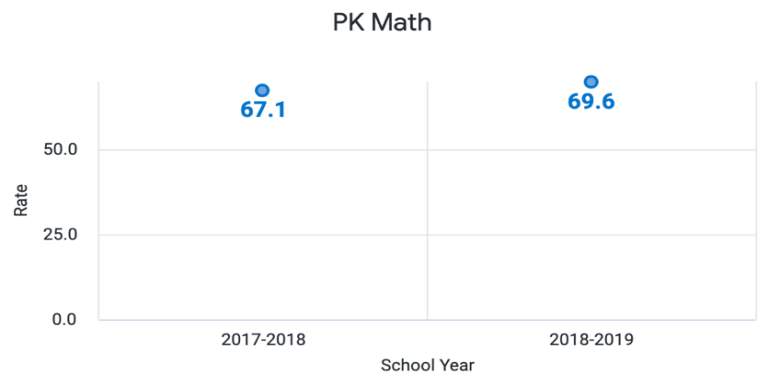
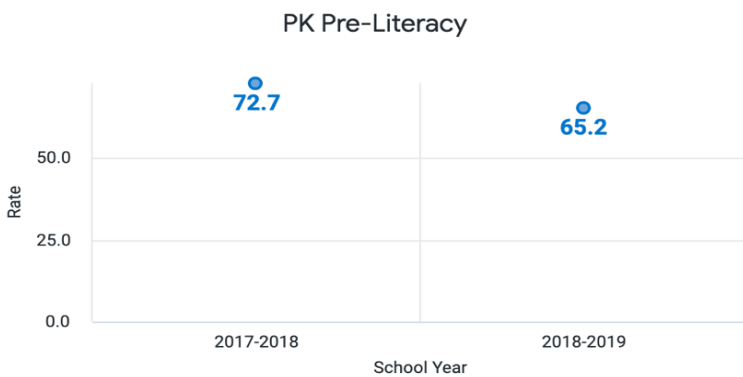
⁴³ For eligibility criteria, see the *2019 – 20 PMF Policy & Technical Guide* here: <https://bit.ly/3aRYFW2>.

⁴⁴ For reference, the CLASS scores are assigned as follows: low scores are 1 or 2, mid scores are from 3 to 5, and high scores are 6 or 7. For details, see: <https://bit.ly/3j2d1X4>.

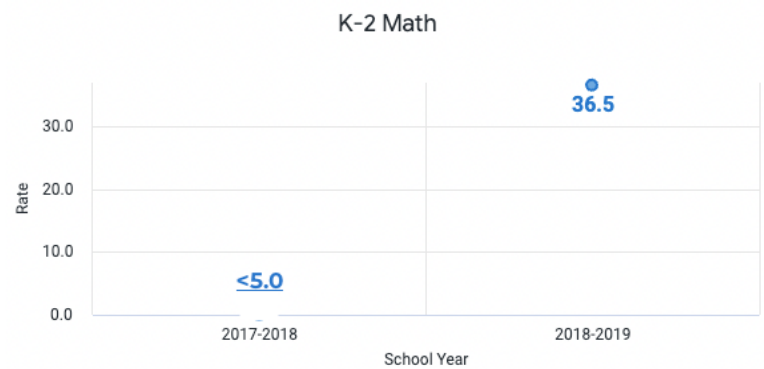
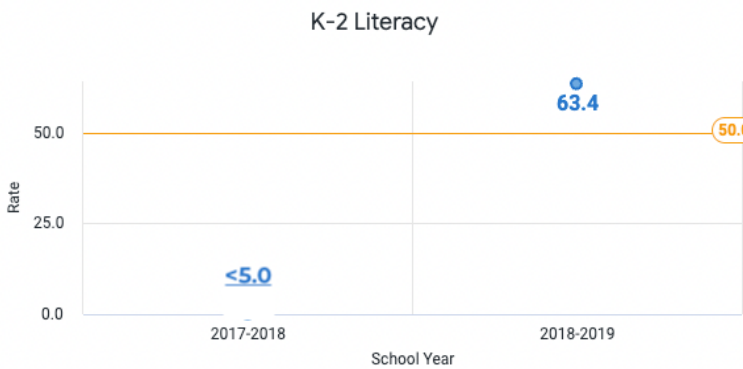
Early Childhood Assessments

Each public charter school that serves early childhood grades selects its own DC PCSB-approved assessments to use with PK – 2 grade students.⁴⁵ These measures do not factor into the school’s PMF score. Ingenuity Prep PCS uses Every Child Ready to assess PK literacy and math progress and proficiency. It administers Northwest Evaluation Association (NWEA) Measures of Academic Progress (MAP) math assessments to grades K – 2.⁴⁶ The school used NWEA MAP Literacy for grades K – 2 in SY 2017 – 18, then adopted the Strategic Teaching and Evaluation of Progress (STEP)⁴⁷ assessment in SY 2018 – 19 and beyond.⁴⁸ The charts below report the school’s early childhood outcomes.

PK Pre-Literacy and Math



K – 2 Literacy and Math⁴⁹



45 For a full list of approved assessments, see the 2019 – 20 PMF Policy & Technical Guide here: <https://bit.ly/3aRYFW2>.

46 For details on NWEA MAP, see: <https://bit.ly/3VZHdFt>.

47 For details on STEP, see: <https://bit.ly/3jnyTl4>.

48 See Ingenuity Prep PCS’s December 2018 Goals Charter Amendment, Appendix A6.

49 In cases of sensitive, negative data at rates greater than 95.0% or less than 5.0%, the data is suppressed.

Additional Data

Student Group Academic Data

The following charts present academic data by student group. Student group academic performance does not individually factor into the school's PMF score, and it does not factor into DC PCSB's charter goals analysis. However, it provides additional context, showing how the school serves different student populations. The charts below show the LEA's academic data by campus in both growth and achievement compared to the sector average for that student group. The following charts do not display student group categories that were not part of the LEA's overall student population or that had less than 10 test takers in both SY 2017 – 18 and SY 2018 – 19.

Key for Student Group Data Charts	
Green	Greater than the charter sector average for the same grade band
Red or <5.0%	Less than the charter sector average for the same grade band or the data is suppressed in cases of sensitive and negative rates less than 5.0%
Blue	Equal to the charter sector average for the same grade band
Grey	The number of test takers (n-size) is less than 10

ELA MGP Growth Rates by Student Group

School Year	2017 – 18		2018 – 19	
Student Group	School Rate	Sector Rate	School Rate	Sector Rate
At-Risk	60.0%	44.5%	56.9%	47.4%
SWD	12.0%	39.6%	37.7%	43.5%
Black or African American	53.0%	44.5%	55.0%	48.9%
Female	53.0%	50.1%	63.2%	54.0%
Male	53.0%	42.5%	50.9%	47.0%

Math MGP Growth Rates by Student Group

School Year	2017 – 18		2018 – 19	
Student Group	School Rate	Sector Rate	School Rate	Sector Rate
At-Risk	43.0%	46.0%	53.8%	46.0%
SWD	29.0%	43.0%	43.8%	44.5%
Black or African American	42.0%	47.0%	46.0%	47.5%
Female	47.0%	50.0%	46.4%	51.5%
Male	41.0%	47.0%	49.9%	47.0%

English PARCC (4+) Proficiency Rates by Student Group

School Year	2017 – 18		2018 – 19	
Student Group	School Rate	Sector Rate	School Rate	Sector Rate
At-Risk	32.1%	21.8%	30.3%	25.0%
SWD	<5.0%	5.8%	<5.0%	9.0%
Black or African American	36.4%	28.3%	34.2%	32.6%
Female	41.3%	39.2%	43.8%	44.9%
Male	33.3%	26.7%	26.7%	30.3%

Math PARCC (4+) Proficiency Rates by Student Group

School Year	2017 – 18		2018 – 19	
Student Group	School Rate	Sector Rate	School Rate	Sector Rate
At-Risk	24.7%	21.3%	39.5%	22.6%
SWD	6.3%	7.2%	7.3%	8.9%
Black or African American	31.0%	27.4%	37.4%	28.7%
Female	41.3%	32.9%	46.1%	35.3%
Male	21.1%	29.6%	30.7%	30.7%

Transitional Goals Data

Per the *COVID-19 Impact Policy*, DC PCSB collected SY 2021 – 22 transitional goals data from all schools to support evaluation during the COVID-19 recovery period.⁵⁰ For schools serving K – 8 students, transitional goals data includes results from a school-selected, nationally normed growth assessment. For grades K – 2, Ingenuity Prep PCS elected to administer NWEA MAP as its math growth assessment. The school also elected to administer Fountas & Pinnell as its ELA assessment for grades K – 2.⁵¹ Transitional goals also include standard data collection, to the extent available, of PARCC (4+), achievement on early childhood assessments,⁵² ISA, re-enrollment, and CLASS performance. The charts below show the school’s overall and student group performance on each transitional goals measure.⁵³

50 See DC PCSB’s transitional goals description in the *COVID-19 Impact Policy*, <https://bit.ly/3JCFwIQ>, p. 2.

51 Per the *2019 – 20 PMF Policy & Technical Guide*, DC PCSB recognizes Fountas & Pinnell as an achievement assessment capturing the “percentage of students at or above the end of the year achievement level.” For details, see: <https://bit.ly/3aRYFW2>, p. 51.

52 In this context, “early childhood” refers to PK3 and PK4.

53 Ingenuity Prep PCS did not submit SY 2021 – 22 growth outcomes for grades 3 – 8.

K – 2 ELA Fountas & Pinnell Achievement Rates by Student Group

Student Group	2021 – 22 ELA Achievement Rates	
	n-size	Rate
All Students	215	36.3%
At-Risk	168	36.3%
SWDs	34	32.4%
Black or African American	210	35.7%
Hispanic/Latino	n < 10	n < 10
Other Races	n < 10	n < 10
Female	106	34.0%
Male	109	38.5%

K – 2 Math NWEA MAP Growth by Student Group

Student Group	2021 – 22 Math Median Conditional Growth Percentile (CGP) ⁵⁴	
	n-size	Score
All Students	215	63.0
At-Risk	168	57.0
SWDs	34	61.0
Black or African American	210	60.5
Hispanic/Latino	n < 10	n < 10
Other Races	n < 10	n < 10
Female	106	46.0
Male	109	69.0

ELA and Math PARCC (4+) Proficiency Rates by Student Group

Student Group	2021 – 22 Proficiency Rates	
	ELA	Math
All Students	17.5%	7.5%
At-Risk	14.3%	5.1%
English Learner	n < 10	n < 10
SWDs	<5.0%	<5.0%
Black or African American	17.8%	7.4%
Hispanic/Latino	n < 10	n < 10

54 CGP typically assesses the relative year-to-year progress made by individual students at a school. Each student's CGP is set by the publisher's norms, based on the student's initial assessment score and grade-level. A median CGP of 50 indicates that a school's students have average year-to-year growth when compared to students nationwide in the same grades and with the same initial assessment performance. Due to the COVID-19 pandemic, DC PCSB calculated CGP for SY 2021 – 22 using students' fall-to-spring scores.

Other Races	n < 10	n < 10
Female	21.7%	5.0%
Male	13.3%	9.9%

PK Pre-Literacy and Math Every Child Ready Rates by Student Group

Student Group	2021 – 22 Rates	
	Pre-Literacy	Math
All Students	63.2%	64.7%
At-Risk	59.3%	64.8%
SWDs	43.8%	56.3%
Black or African American	63.1%	63.8%
Hispanic/Latino	n < 10	n < 10
Female	70.1%	70.1%
Male	56.1%	59.1%

ISA

2021 – 22 ISA Rate
82.8%

Re-enrollment

2021 – 22 Re-enrollment Rate
84.3%

CLASS⁵⁵

2021 – 22 CLASS Scores		
Classroom Organization	Emotional Support	Instructional Support
6.0	6.1	3.1

⁵⁵ As previously noted, CLASS scores are assigned as follows: low scores are 1 or 2, mid scores are from 3 to 5, and high scores are 6 or 7. For details, see: <https://bit.ly/3j2d1X4>.

SECTION TWO: COMPLIANCE WITH CHARTER AND APPLICABLE LAWS

Per the SRA, when reviewing a charter, DC PCSB must determine whether a school has "committed a violation of applicable laws or a material violation of the conditions, terms, standards, or procedures set forth in its charter, including violations relating to the education of children with disabilities."⁵⁶ The SRA contains a non-exhaustive list of applicable laws, which DC PCSB monitors in its annual compliance reviews. Since SY 2017 – 18, Ingenuity Prep PCS has been compliant with all applicable laws as captured in DC PCSB's compliance reviews.⁵⁷

DC PCSB also monitors schools' compliance with the procurement requirements in the SRA, and supports OSSE, as the state education agency (SEA), in its monitoring of compliance with special education laws.

The remainder of this section examines the school's compliance in these two areas over the review period.

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. Within three days of awarding such a contract, schools must 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 fiscal year (FY) 2018, Ingenuity Prep PCS properly submitted 14 procurement contract packages. In early 2018, DC PCSB developed more robust and comprehensive oversight processes around procurement contracts. As a result, in July 2018, DC PCSB began implementing the revised *Procurement Contract Submission and Conflict of Interest Policy*,⁵⁸ which tracks the timeliness of procurement contract submissions. Schools, in turn, were expected to adjust their internal processes over time to ensure higher levels of compliance with procurement contract reporting requirements.

In FY 2019, Ingenuity Prep PCS properly submitted one procurement contract package. However, during the annual procurement contract reconciliation process, DC PCSB found the school did not properly submit 19 procurement contracts. After communicating with the school, Ingenuity Prep PCS properly submitted all relevant documentation.

56 D.C. Code § 38-1802.12(a)(3).

57 Every winter, DC PCSB produces a Compliance Review Report for each public charter school in its portfolio. The report summarizes a school's year-to-date compliance status; it does not include a conclusive compliance determination. See DC PCSB's Compliance Review Reports here: <https://bit.ly/3ESLUfl>. See Ingenuity Prep PCS's Compliance Review Reports, Appendices J1 – J5.

58 See the *Procurement Contract Submission and Conflict of Interest Policy* here: <https://bit.ly/2QkQjgn>.

Additionally, the school received two Early Warning Notices for failure to submit contracts in a timely manner.

In FY 2020, Ingenuity Prep PCS properly submitted two procurement contract packages. However, during the annual procurement contract reconciliation process, DC PCSB found the school did not properly submit seven procurement packages. After communicating with the school, Ingenuity Prep PCS properly submitted all relevant documentation. Additionally, the school received an Early Warning Notice for failure to submit a contract in a timely manner.

In FY 2021, Ingenuity Prep PCS properly submitted 21 procurement contract packages, but did not properly report two contracts. After communicating with the school, Ingenuity Prep PCS properly submitted all relevant documentation. Additionally, the school received an Early Warning Notice for failure to submit a contract in a timely manner.

While, at this time, DC PCSB has no major concerns about the LEA's compliance with procurement contract submission requirements, DC PCSB recommends the school strengthen its internal bidding and reporting processes to ensure late submission trends do not continue.

Special Education Compliance⁵⁹

Charter schools are required to comply with all federal and local special education laws, including the Individuals with Disabilities Education Act (IDEA)⁶⁰ and Section 504 of the Rehabilitation Act of 1973.⁶¹

OSSE Special Education Compliance Monitoring

As the SEA, OSSE monitors charter schools' compliance with special education laws and shares detailed findings in seven areas captured in the table below.⁶²

Of the seven monitored areas,⁶³ Ingenuity Prep PCS was required to take corrective action in four areas during the review period. DC PCSB compared this performance to other charter LEAs in DC, and based on this comparison, determined the school had among the highest instances of identified noncompliance in one area: Hearing Officer Determination and State Complaint Implementation Review. Further information on OSSE's special education compliance findings is reported in the remainder of this section.

59 See OSSE's Glossary of Special Education Compliance Terms, Appendix K.

60 20 U.S.C. §§ 1400 *et seq.* See 20 U.S.C. § 1413(a)(5).

61 29 U.S.C. § 794.

62 For a description of each review area, see the Special Education Factsheet, Appendix L.

63 Schools that enroll students who are 14 years of age or older meet the criteria for Secondary Transition Monitoring and therefore are monitored in eight compliance areas. Schools that enroll only younger students are monitored in seven compliance areas.

OSSE Special Education Compliance Review Areas	Ingenuity Prep PCS Compliant All Years of the Review Period	Status of Corrective Action
1. Annual Determinations	No	Complete
2. On-Site Monitoring	Yes	NA
3. IDEA Procedural Timeliness Monitoring a) Initial Evaluation b) Reevaluation c) Part C to B transition	No	Complete
4. Child Find Monitoring	No	Complete
5. Disproportionate Representation and Significant Discrepancy Review	Yes	NA
6. Significant Disproportionality Review	Yes	NA
7. Hearing Officer Determination and State Complaint Implementation Review	No	Complete

1. Annual Determinations

Each year, OSSE analyzes each LEA's compliance with special education requirements and issues its findings in an Annual Determination report to the LEA. As the table below shows, Ingenuity Prep PCS received a "Meets Requirements" designation in its 2017 determination. In 2018 and 2019, OSSE required Ingenuity Prep PCS to take corrective action because the school received a "Needs Assistance" designation on two consecutive Annual Determinations. OSSE recommended the school seek training and technical assistance to improve overall performance. OSSE confirms the school completed a corrective action plan resolving 2018 and 2019 findings. Ingenuity Prep PCS received a "Meets Requirements" designation in its 2020 determinations.

Year	Percent Compliant with Audited Special Education Federal Requirements	Determination Level
2017	84.3%	Meets Requirements
2018	70.8%	Needs Assistance
2019	71.4%	Needs Assistance
2020	84.2%	Meets Requirements

2. On-Site Monitoring Report

OSSE conducts on-site monitoring visits at select LEAs to determine whether they are compliant with federal and local laws and regulations (including special education and related service requirements). Per OSSE’s SY 2019 – 20 On-Site Monitoring Report, Ingenuity Prep PCS was not compliant in eight student-level areas, as reported in the table below. For comparison, Ingenuity Prep PCS is one of six charter LEAs OSSE flagged for an On-Site Monitoring Report in SY 2019 – 20. This represents 10.0% of charter LEAs. OSSE confirms the school addressed all areas of noncompliance.

On-Site Monitoring Report – Student-Level Compliance			
Compliance Area	Compliant?	Noncompliant Indicators	Corrected?
Initial Evaluation and Reevaluation	4 of 5 indicators compliant	Parents Provided Procedural Safeguards	Yes
Individualized Education Program (IEP)	11 of 18 indicators compliant	<ul style="list-style-type: none"> • Parent/Student Invited to IEP Meeting • Parent/Student Notified of Meeting • All Members of the IEP Team Attended IEP Meeting • ESY Determined on Individual Basis • IEP Review of Progress of Annual Goal • IEP Developed Within 30 days of Initial Eligibility Determination • Implementation of Related Services 	Yes
Least Restrictive Environment	3 of 3 indicators compliant	0	NA

3. IDEA Procedural Timeliness

OSSE monitors schools in three areas related to the timeliness of creating and maintaining compliant Individualized Education Programs (IEPs) for students: Initial Evaluation, Reevaluation, and Part C to B Transition Timeliness.

*Initial Evaluation*⁶⁴

An initial evaluation is a process used to assess a student to determine whether a student has a disability and, if so, the nature and extent of the special education and

64 See Ingenuity Prep PCS’s Initial Evaluation Reports, Appendices M1 – M4.

related services the student needs to access the general education curriculum. OSSE identified Ingenuity Prep PCS for noncompliance for failure to adhere to the required timeline for initial evaluation during the following periods:

- July 1, 2018 – December 30, 2018
- January 1, 2019 – June 30, 2019
- October 1, 2019 – December 31, 2019
- January 1, 2020 – March 31, 2020

For comparison, across the last five years, Ingenuity Prep PCS performed better than 69.8% of charter LEAs, receiving a finding in four reporting periods out of the 10 applicable reporting periods.⁶⁵ OSSE confirms the school has addressed all findings.

Reevaluation⁶⁶

A reevaluation is used to determine whether a student with an identified disability still has a disability. Schools must conduct a reevaluation for each student with a disability once every three years. OSSE identified Ingenuity Prep PCS for noncompliance for not adhering to the required timeline for reevaluation during the following periods:

- October 1, 2017 – March 31, 2018
- April 1, 2018 – June 30, 2018
- July 1, 2018 – September 30, 2018
- October 1, 2018 – March 31, 2019
- April 1, 2019 – June 30, 2019
- July 1, 2019 – September 30, 2019
- October 1, 2019 – December 31, 2019
- January 1, 2020 – March 31, 2020

For comparison, across the last five years, Ingenuity Prep PCS performed better than 15.2% of charter LEAs, receiving a finding in eight reporting periods out of the 13 applicable reporting periods.⁶⁷ OSSE confirms the school has addressed all findings.

Part C to B Transition Timeliness

Part C to B Transition refers to transitioning children who receive early intervention services in IDEA Part C (birth through age two) to IDEA Part B special education services (age three to 21) by the child's third birthday. To date, Ingenuity Prep PCS has not been flagged for Part C to B Transition timeliness noncompliance.

65 Out of the 10 total reporting periods, the LEA with the highest number of reporting periods with a finding for Initial Evaluation Timeliness had a finding in eight.

66 See Ingenuity Prep PCS's Reevaluation Reports, Appendices N1 – N8.

67 Out of the 13 total reporting periods, the LEA with the highest number of reporting periods with a finding for Reevaluation Timeliness had a finding in 11.

4. Child Find Monitoring Report⁶⁸

Child Find is a set of policies, procedures, and public awareness activities designed to locate, identify, and evaluate students who may require special education and related services. OSSE reviewed and flagged Ingenuity Prep PCS for Child Find monitoring in SY 2017 – 18 through SY 2020 – 21, as shown in the table below.

Year	Percentage of Students Identified	Corrective Action Required	Corrected?
2018	16.3%	Conduct a Child Find training for all staff prior to the beginning of SY 2018 – 19	Yes
2019	7.4%	No action required	NA
2020	8.0%	<ul style="list-style-type: none"> • Submit policy • Participate in a webinar • Receive technical assistance 	Yes
2021	6.6%	Participate in technical targeted assistance (TTA)	In Progress

In a March 2018 letter, OSSE informed Ingenuity Prep PCS about the results of its Child Find data review, which concluded the school identified 16.3% of its students as receiving services under IDEA Part B in SY 2017 – 18. OSSE asked Ingenuity Prep PCS to submit its Child Find policies, practices, and procedures to ensure the identification rate was not the result of inappropriate policies and procedures. Although Ingenuity Prep PCS's identification rate was above the 8.5% threshold, OSSE determined Ingenuity Prep PCS's Child Find policies, practices, and/or procedures were not aligned with IDEA and/or local law.⁶⁹

For comparison, 33.9% of schools that had an appropriate identification rate were identified as having policies not in alignment with IDEA and/or local law. OSSE required Ingenuity Prep PCS to revise its policies and train all instructional staff, support staff, principals, and other school administrators in Child Find processes and procedures

68 See Ingenuity Prep PCS's Child Find Focused Monitoring Report, Appendix O.

69 As a result of a case in the US Court of Appeals for the District of Columbia, *D.L. v. The District of Columbia*, the District must ensure at least 8.5% of 3 to 5-year-old children who reside in or are wards of the District are "enrolled" in special education and related services (Part B services). For details, see: <https://bit.ly/2EnRn0o>.

before SY 2018 – 19. OSSE confirms the school addressed all SY 2017 – 18 corrective action requirements.

During SY 2019 – 20, OSSE flagged all charter LEAs with a 3- to 5-year-old population for an identification rate lower than the 8.5% threshold and required the schools to take corrective action.

During SY 2020 – 21, Ingenuity Prep PCS was one of 16 LEAs serving 3- to 5-year-old students assigned OSSE-facilitated TTA. Over 60.0% of LEAs monitored in SY 2020 – 21 received the same corrective action. While OSSE did not flag Ingenuity Prep PCS for its overall identification rate in SY 2018 – 19, SY 2019 – 20, or SY 2020 – 21, the school persists in a comparatively low identification rate for 3- to 5-year-old SWD. OSSE confirms the school completed the corrective action steps required for the SY 2018 – 19 and SY 2019 – 20 monitoring activities. It also confirms Ingenuity Prep PCS is currently participating in TTA for SY 2020 – 21 requirements.

5. Disproportionate Representation Review and Significant Discrepancy Review

OSSE annually reviews whether LEAs have overidentification or disproportionate representation by race and ethnicity of their identified students with disabilities. OSSE determined Ingenuity Prep PCS does not have disproportionate representation during the review period.

Significant Discrepancy Review

OSSE annually reviews LEAs' rates of suspension and expulsion for students with disabilities as compared to their non-disabled peers. OSSE determined Ingenuity Prep PCS does not have significant discrepancy during the review period.

6. Significant Disproportionality Review

OSSE annually reviews LEAs for significant disproportionality based on race or ethnicity in an LEA with respect to the identification of children as children with disabilities, the identification of children in specific disability categories, the placement of children with disabilities in particular educational settings, or the taking of disciplinary actions. OSSE determined Ingenuity Prep PCS does not have significant disproportionality during the review period.

7. Hearing Officer Determination (HOD) Implementation Review

Parents of students with disabilities may file complaints with OSSE as it relates to student-specific issues and systemic issues. Student-specific complaints are known as due process complaints, and systemic complaints are known as state complaints. When necessary, OSSE conducts hearings to resolve disagreements identified via parent complaint. OSSE issues a written HOD after each due process hearing, detailing its findings along with any actions the LEA must fulfill. OSSE then oversees the timely

implementation of actions required by HODs. The chart below shows the one complaint brought against the school during the review period that resulted in a finding of noncompliance by a Hearing Officer.

Transmittal Date⁷⁰	HOD Implementation and Timeliness Status⁷¹
12/2017	Implemented and Untimely

For comparison, of the 39 HODs issued over the past five years, 43.6% of those findings were given an “Implemented Timely” status. Approximately 10.3% were given an “Implemented and Untimely” status, and 33.3% were given a “Not Implemented and Timely” status. In total, 23 charter LEAs received at least one HOD over the past five years.

State Complaints⁷²

Any individual or organization may submit a written complaint that claims that any District of Columbia public agency has failed to comply with a requirement of Part B or Part C of the IDEA or the District’s laws and regulations regarding special education. Such laws include the identification, evaluation, educational placement of the child, and the provision of a Free and Appropriate Public Education (FAPE) to such child. The chart below shows the three state complaints brought against the school during the review period.

School Year	State Complaint Implementation and Timeliness Status
SY 2019 – 20 (October)	Implemented Timely
SY 2019 – 20 (December)	Implemented Timely
SY 2019 – 20 (March)	Implemented Timely

For comparison, 34 charter LEAs received at least one state complaint over the past five years. Ingenuity Prep PCS is the only charter LEA to have three state complaints filed during a single school year over this period.

In a letter issued in May 2020, in response to a first state complaint, OSSE determined the school was noncompliant in one of five issues raised by the complainants. OSSE determined the school failed to provide proper notice for an IEP Team meeting. OSSE

⁷⁰ 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.

⁷¹ An HOD may be implemented timely, implemented untimely, not implemented and untimely, or not implemented and timely.

⁷² See Ingenuity Prep PCS’s State Complaint Letters of Decision, Appendices P1 – P3.

required the school to train relevant staff members on the notice requirements for IEP Team meetings. OSSE also required the school to convene an IEP team meeting with the parent to determine what compensatory education it owed the student. OSSE required the school to provide documentation of completion within 60 days of the letter issue date. OSSE confirms the school completed all required corrective action.

In a letter issued in February 2020, in response to a second state complaint, OSSE determined the school was noncompliant in one of three issues raised by the complainants. OSSE determined the school failed to provide all of the specialized instruction hours for the student in the least restrictive environment required by the student's IEP. OSSE required the school to train relevant staff members on the notice requirements for IEP Team meetings. OSSE also required the school to convene an IEP Team meeting to determine what compensatory education it owed the student. OSSE required the school to provide documentation of completion within 30 days of the letter issue date. OSSE confirms the school completed all required corrective action.

In a letter issued in May 2020, in response to a third state complaint, OSSE determined the school was noncompliant because it failed to provide all of the specialized instruction and occupational therapy services required in the student's IEP. OSSE also determined the school failed to provide specialized instruction in the least restrictive environment required in the student's IEP. OSSE required the school to make up missed occupational therapy services, provide tutoring services, and train relevant staff members on placement decision requirements and procedures. OSSE also required the school to convene an IEP Team meeting to determine the compensatory education it owed the student. OSSE required the school to make up the missed occupational therapy within 30 days of the letter issue date. OSSE required the school to complete the remaining corrective action within 60 days of the letter issue date. OSSE confirms the school completed all required corrective action.

DC PCSB Oversight and Special Education Audits

In SY 2019 – 20, DC PCSB received a series of community complaints regarding systemic concerns with student safety, special education compliance, and staffing at Ingenuity Prep PCS. In response, DC PCSB conducted a special education audit of the school.

DC PCSB's *Special Education Audit Policy* establishes the criteria DC PCSB will review and the audit procedures it will initiate in response to concerns of special education noncompliance.⁷³ A school may be subject to a special education audit for meeting one or more of the criteria listed in the policy,⁷⁴ including if "a community complaint alleges

⁷³ See DC PCSB's *Special Education Audit Policy*, <https://bit.ly/3Am22Aa>.

⁷⁴ Procedures include two types of staff-initiated audits, desk audits and on-site audits, which are defined in the policy. Each shall result in written recommendations or further action. Additional audit procedures represent interventions the Board may use after an audit to ensure special education compliance.

a systemic issue with the denial of parental safeguards, provision of special education services, or concern for the safety of students with disabilities.”

In November 2019, in response to the initial community complaint, DC PCSB staff conducted a site visit at the school. After the visit, DC PCSB staff and Ingenuity Prep PCS met to discuss the complaints, the school’s response, and potential turnaround efforts.

In December 2019, in response to subsequent complaints alleging systemic issues with the school’s special education program, DC PCSB conducted a desk audit of the program.⁷⁵ Consistent with the *Special Education Audit Policy*, DC PCSB required the school to provide data and supplemental documentation.

In January 2020, DC PCSB concluded its audit and submitted its conclusions and recommendations to Ingenuity Prep PCS. DC PCSB made the following conclusions:

- From SY 2018 – 19 through SY 2019 – 20, students with disabilities were retained at five times the rate of their general education peers.
- The school experienced staffing challenges, resignations, and transitions.
- The school needed extensive special education programming and compliance training and oversight.
- While the school created a turnaround plan in SY 2019 – 20, it is unclear the extent to which the strategies implemented had an impact on school climate and culture.
- The school struggled to measure the success of its turnaround plan.
- While the school reported that it no longer used seclusion,⁷⁶ there was inconsistent evidence that it had.
- The school inconsistently followed its policies regarding restraint and physical escort.

For the remainder of SY 2019 – 20, DC PCSB staff conducted a series of unannounced site visits at the school.

DC PCSB Board Intervention

In February 2020, after 13 community complaints,⁷⁷ a staff-to-staff meeting, regular site visits to the school by DC PCSB staff, and a desk audit of Ingenuity Prep PCS’s special education program, members of the DC PCSB Board met with the school to discuss these ongoing challenges. As a result of that meeting,⁷⁸ the school provided DC PCSB

⁷⁵ See DC PCSB’s *Special Education Audit Policy*, <https://bit.ly/3Am22Aa>.

⁷⁶ The US Department of Education defines seclusion as the involuntary confinement of a student alone in a room or area from which the student is physically prevented from leaving.

⁷⁷ The school ultimately received 17 community complaints during SY 2019 – 20.

⁷⁸ See DC PCSB’s March 2020 follow-up letter to Ingenuity Prep PCS, Appendix I.

with updates on the school's progress toward its turnaround goals. The school's board agreed to form a sub-committee consisting of five board members who closely followed the turnaround efforts and community complaints at the school.

During the September 2020 DC PCSB public meeting, the DC PCSB Board required the school's leadership to provide an update on the school's progress in addressing these issues and answer the Board's questions.⁷⁹

In SY 2020 – 21, Ingenuity Prep PCS received one community complaint; however, it was not related to the provision of special education services. In SY 2021 – 22, Ingenuity Prep PCS received two community complaints, neither of which focused on special education or related services.

⁷⁹ See materials from the September 2020 meeting, including a video recording and transcript, here: <http://bit.ly/3TQrEyh>.

SECTION THREE: FISCAL MANAGEMENT AND ECONOMIC VIABILITY⁸⁰

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 GAAP;
- has engaged in a pattern of fiscal mismanagement; and/or
- is no longer economically viable.⁸¹

DC PCSB collectively and holistically assessed the school's financial performance and condition by reviewing:

- the school's audited financial statements for FY 2017 through FY 2021;
- the school's unaudited financial statements for FY 2022;
- the school's annual budgets for FY 2022 and FY 2023; and
- DC PCSB's Financial Analysis Report (FAR) on Ingenuity Prep PCS for FY 2017 through FY 2021.⁸²

Summary of Findings⁸³

Ingenuity Prep PCS has demonstrated adequate fiscal performance during the review period. Its financial audits confirm 1) the school's financial statements comply with GAAP, 2) the school has adequate internal accounting controls, and 3) the school is financially solvent and able to pay its outstanding obligations if the school's charter were to be revoked or not renewed. The school is economically viable and has not engaged in a pattern of fiscal mismanagement.

Strengths and Deficiencies

- The school demonstrated good financial health in the five-year period between FY 2017 and FY 2021. The school's FY 2021 key performance indicators are all above target.
- As a percentage of total operating expenses, the school spends more than the sector median on salaries and benefits, and less than the sector median on direct student, occupancy, and general expenses.
- Its advantageous lease terms allow the school to incur occupancy expenses below the DC facilities funding received. The school's current lease will expire at fiscal year-end (FYE) 2023.
- The significant deficiency in internal controls over financial reporting identified by the auditor in FY 2019 was not repeated in subsequent years, and thus appears to have been a one-off event remediated by the school.

80 Each percentage in Section Three of this report has been rounded to the nearest whole percentage.

81 See D.C. Code § 38-1802.13(b).

82 See the school's FAR Reports, Appendices Q1 – Q5.

83 See Financial Definitions and Examples, Appendix R.

- The school implemented a corrective action plan to remediate the two instances of noncompliance with federal awards requirements in FY 2020 and FY 2021 identified by the auditor. The school's leadership and board do not expect the findings to be repeated due to the stronger controls implemented around bidding and debarred parties' verification.

Key for Finance Data	
Comparison to FAR Benchmarks	What This Means in the Following Tables
Within target range	Generally strong financial position
Outside of target range	Possibly more imminent financial concerns; operations may not be adequately managed, sustainable, and/or economically viable; closer monitoring warranted

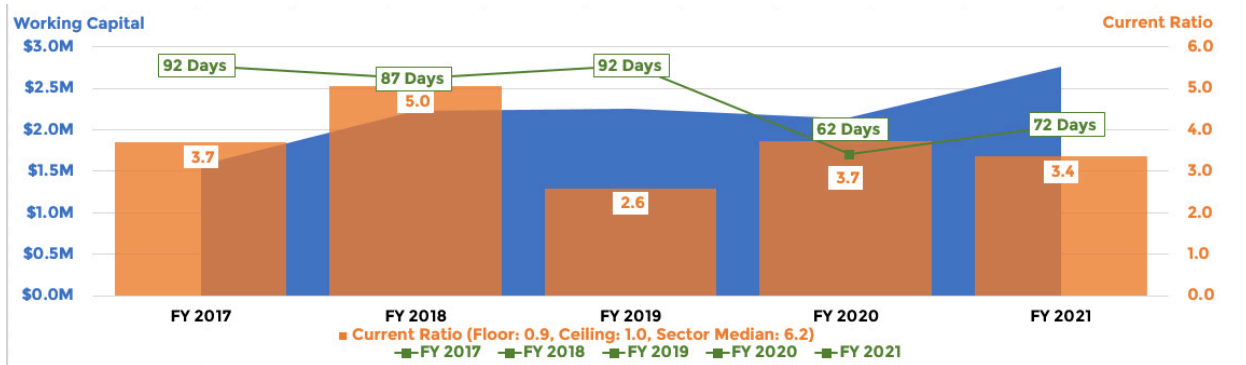
Definitions and examples for each key performance indicator used herein are provided in Appendix R.

Key Metrics and Comparisons

Enrollment and Operations

The school's change in net assets has been positive each year, averaging \$0.6M from FY 2018 through FY 2021 after a \$0.1M loss in FY 2017. Net assets grew \$2.4M (92%) from FYE 2017 to FYE 2021. This growth was attributable mainly to the school's 101% enrollment increase, from FY 2017 to FY 2021, with the addition of a new grade level each year from FY 2018 through FY 2021 and high cohort retention rates. Opening grade seven in FY 2021 contributed to a 19% enrollment increase from FY 2020 and significantly contributed to that FY's \$2.4M (16%) increase in operating revenues and \$1.1M change in net assets. The school effectively managed its expenses during the grade level expansion and efficiently allocated more for salaries and benefits as a percentage of total operating expenses (70%) than the sector median (63%). From FY 2017 through FY 2021, the school's operating expenses composition has generally remained consistent, with a slight decrease in direct student expenses, mainly due to the decline in food service and catering expenses during the COVID-19 pandemic; this allowed the school to invest more in its personnel.

Liquidity



Days of cash on hand and the current ratio at FYE 2017 through FYE 2021 remained above target. Working capital increased \$0.7M (41%) from FYE 2017 to FYE 2018, remained stable from FYE 2018 to FYE 2020, and continued increasing \$0.6M (29%) from FYE 2020 to FYE 2021, mainly due to the cash margin provided by operating activities that averaged 6% in the five-year period. The current ratio and the days of cash on hand decreased, and the working capital did not increase in FYE 2019 and FYE 2020 mainly due to the investments in the educational facility. The negative effect of the investment in leasehold improvements on these measures was temporary, as the school did not finance the investments with debt.

Facilities and Occupancy

In FY 2021, the school's occupancy expenses were commensurate with its DC facility funding at almost 100% of the received DC facilities funding, lower than the 117% sector median. The school has a lease agreement for the rental of a facility that will expire in June 2023. The FY 2022 lease called for lease payments of 90% of the DC per pupil facility funding. The \$35 per square foot school occupancy expenses are slightly above the \$30 sector median, but it is not concerning given the school also funded its FY 2020 and FY 2021 renovations with a \$0.8M Scholarships for Opportunity and Results (SOAR) Act Public Facilities Grant.

Sustainability: Net Assets, Primary Reserve Ratio, and Debt Ratio

Fiscal Year	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2021 Target	FY 2021 Sector Median	Multiyear Trend
Net Assets	\$2.6M	\$3.3M	\$3.6M	\$3.9M	\$5.0M	NA	\$6.0M	
Operating Expenses	\$8.1M	\$10.5M	\$12.8M	\$15.3M	\$16.8M	NA	\$10.6M	
Primary Reserve Ratio (Higher is better)	0.3	0.3	0.3	0.3	0.3	>= 0.2	0.6	
Debt Ratio (Lower is better)	0.2	0.1	0.3	0.2	0.2	<= 0.5	0.4	

In the five-year period from FY 2017 to FY 2021, the primary reserve ratio was healthy and consistently above target. The debt ratio has remained low and in the target range in the five-year period between FYE 2017 and FY 2021, mainly due to the absence of long-term debt.

Audit Findings

In FY 2019, the auditor identified a significant deficiency related to the audit of the financial statements. Due to personnel and bookkeeping firm turnover, the school did not have appropriate bank reconciliations review controls in place in FY 2019. The school took the appropriate corrective action, and the finding was not repeated in subsequent audits. Accordingly, this deficiency appears to have been a one-off event remediated by the school in subsequent audits.

In both FY 2020 and FY 2021, the auditor found noncompliance with federal awards requirements related to the procurement bidding process for contracts with estimated cost above \$250,000. The school contracted with a construction company with the use of federal dollars, but it did not follow a competitive bid process. Since this contractor performed services in June 2020 and the first half of 2021, before the auditor shared the finding with the school, the issue stretched over two FYs. In FY 2022, the school’s management implemented review procedures to ensure that procurement procedures are correctly followed and does not expect this to be a repeat finding in FY 2022. Additionally, in FY 2021, the auditor found noncompliance with the “Debarred and Suspended Parties” requirement, as the school did not obtain the proper evidence to ensure a vendor is excluded from participating in a federal award. The school’s leadership implemented new controls (e.g., checking the General Services Administration’s System for Award Management before entering in a vendor contract) to follow the requirement. The school

does not expect this to be a repeat finding in FY 2022. DC PCSB will monitor the FY 2022 audit report to confirm findings are remediated.