



Lea Crusey
Board Chair

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

February 5, 2024

Via Electronic Mail

Desa Sealy
Board Chair

Roseyn Hood
Head of School

SEED Public Charter School of Washington, DC

4300 C Street SE
Washington, DC 20019

Re: 25-Year Charter Review of SEED Public Charter School of Washington, DC

Dear Ms. Sealy and Ms. Hood:

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 SEED Public Charter School of Washington, DC (SEED 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 December 19, 2022, DC PCSB staff provided the school with a draft version of this report and allowed an opportunity for the school to respond. DC PCSB staff 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 with the following condition:

¹ See DC Code § 38-1802.12(a)(3).

² See DC Code § 38-1802.13(a)-(b).



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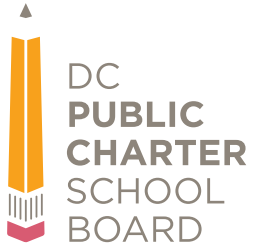
- a. By March 3, 2023, SEED PCS shall submit a draft plan for improving procurement contract submission compliance for DC PCSB's review. At a minimum, the plan must include 1) strategies the school will use to improve internal procedures and 2) a description of how the school will measure the plan's success.
- b. By April 3, 2023, the school shall submit a final procurement contract submission compliance plan that incorporates and addresses, to DC PCSB's satisfaction, any feedback DC PCSB provides. Further, the school must comply with DC PCSB's *Procurement Contract Submission and Conflict of Interest Policy* and *Data and Document Submission and Verification Policy*. Should DC PCSB recognize noncompliance, it will engage SEED PCS's board about needed improvement or take additional action as appropriate under each policy.

At its public board meeting on January 23, 2023, the DC PCSB Board voted to conditionally 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 with a condition, 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.



Lea Crusey
Board Chair

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

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

DISTRICT OF COLUMBIA PUBLIC CHARTER SCHOOL BOARD

Charter Actions Requiring a Vote

- Approve a Charter Application (15 yrs)
- Approve a Charter Renewal (15 yrs)
- Approve Charter Continuance
- Approve a Charter Amendment Request
- Give a Charter Notice of Concern
- Lift the Charter Notice of Concern
- Commence Charter Revocation Proceedings
- Revoke a Charter
- Board Action, Other _____

Non-Voting Board Items

- Public Hearing Item
- Discussion Item
- Read into Record

Policies

- Open a New Policy or Changes to a Policy for Public Comment
- Approve a New Policy
- Approve an Amendment to an Existing Policy

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

SUBJECT: **Charter Review: SEED Public Charter School of Washington, DC**

DATE: **January 23, 2023**

Recommendation

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

Charter Review Findings

DC PCSB staff conducted a 25-year charter review of SEED 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

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.*

goals); 2) compliance with its charter and applicable federal and local laws; and 3) 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 | SEED PCS met its charter goals. | | | | |
| Compliance | SEED PCS did not violate the law or materially violate its charter; however, the school has a concerning history with procurement compliance. | | | | |
| Finance | SEED PCS did not commit fiscal mismanagement. | | | | |
| Performance Management Framework (PMF) Outcomes | | | | | |
| 2017 – 18 | 2018 – 19 | 2019 – 20 | 2020 – 21 | 2021 – 22 | Average |
| 65.4% | 67.4% | Not Applicable (NA) ³ | | | 66.4% |

SEED 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, SEED PCS committed to achieving an average PMF score equal to or exceeding 50.0% over the review period. As the chart above reports, SEED PCS met its goals, earning above the targeted PMF average.

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.

However, SEED PCS has a concerning history of inconsistent communication and reporting on its procurement contracts. On several occasions throughout the review period, DC PCSB staff reminded SEED PCS staff of missed deadlines and missing procurement contract submissions. While the school resolved the outstanding contracts for fiscal year (FY) 2021, DC PCSB staff remains concerned about the school's lack of fidelity to DC PCSB's procurement reporting requirements. Based on these findings, DC PCSB staff recommends the Board vote to continue SEED PCS's charter with the following conditions.

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>.

- a. By March 3, 2023, SEED PCS shall submit a draft plan for improving procurement contract submission compliance for DC PCSB's review. At a minimum, the plan must include 1) strategies the school will use to improve internal procedures and 2) a description of how the school will measure the plan's success.
- b. By April 3, 2023, the school shall submit a final procurement contract submission compliance plan that incorporates and addresses, to DC PCSB's satisfaction, any feedback DC PCSB provides. Further, the school must comply with DC PCSB's *Procurement Contract Submission and Conflict of Interest Policy* and *Data and Document Submission and Verification Policy*. Should DC PCSB recognize noncompliance, it will engage SEED PCS's board about needed improvement or take additional action as appropriate under each policy.

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.

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.⁴ For schools serving high school students like SEED PCS, transitional goals data includes the following outcomes: growth on a nationally normed assessment, Partnership for Assessment of Readiness for College and Careers (PARCC) proficiency, gateway,⁵ attendance, and re-enrollment. See SEED PCS's SY 2021 – 22 transitional goals performance on pages 25 through 28 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.⁶

In addition to collecting transitional goals data, DC PCSB staff conducted a Qualitative Site Review (QSR) at SEED 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 SEED PCS's SY 2021 – 22 QSR performance on pages 9 and 10 of the attached Preliminary Charter Review Report.

⁴ See DC PCSB's transitional goals description in the *COVID-19 Impact Policy*, <https://bit.ly/3JCFwIQ>, p. 2.

⁵ "Gateway" refers to measures that predict students' future academic performance.

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

Rationale

As previously noted, DC PCSB staff is concerned with SEED PCS's compliance with, and internal procedures for, procurement contract submission requirements. For the past three fiscal years, during DC PCSB's annual procurement contract reconciliation process, DC PCSB staff found SEED PCS did not report several procurement contracts. The school reported many of its procurement contracts only after direct requests from DC PCSB staff. Further, in SY 2021 – 22, SEED PCS was unresponsive for five months when DC PCSB staff sought outstanding procurement contracts. The condition DC PCSB staff recommends reaffirms the school's responsibility for fulfilling the SRA's procurement reporting requirements and adhering to DC PCSB policies.⁷

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

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

⁷ D.C. Code § 38-1802.04(c)(1).

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.

¹¹ D.C. Code § 38-1802.13(b).

Background

SEED PCS began operation in 1998 under authorization from DC PCSB. The school educates 255 students in ninth through twelfth grade at a facility located in Ward 7.¹² SEED PCS’s mission is to:

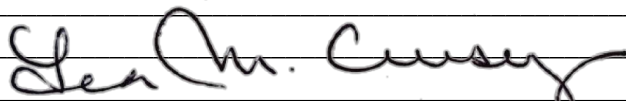
provide an outstanding intensive residential education program to at-risk inner-city children that prepares them, both academically and socially, for success in college and/or in the professional world.

Notification

On December 6, 2022, DC PCSB staff notified Advisory Neighborhood Commissioner Brittany N. Hughes (7F05) of the school's 25-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: SEED PCS 25-Year Preliminary Charter Review Report

| |
|--|
| <p>Date: <u>January 23, 2023</u></p> <p>DC PCSB Action: <input type="checkbox"/> Approved <input checked="" type="checkbox"/> Approved with Changes <input type="checkbox"/> Rejected</p> <p>Changes to the Original Proposal: Conditions are outlined in the document.</p> <p>_____</p> <p>_____</p> <p>_____</p> <p>Board Chair Signature: </p> |
|--|

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

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



2022 – 23 25-Year Charter Review Report SEED Public Charter School of Washington, DC

January 23, 2023

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

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BOARD VOTE AND KEY FINDINGS¹

| SEED Public Charter School of Washington, DC (SEED PCS) ^{2, 3} | | | | | |
|--|--|----------------------------------|-----------|-----------|--------------|
| Review or Renewal | 25-year charter review | | | | |
| Review Period | School year (SY) 2017 – 18 through SY 2021 – 22 | | | | |
| Charter Goals | SEED PCS met its charter goals. | | | | |
| Compliance | SEED PCS did not violate the law or materially violate its charter; however, the school has a concerning history with procurement compliance. | | | | |
| Finance | SEED PCS did not commit fiscal mismanagement. | | | | |
| Board Vote | The Board has voted 5 – 0 to conditionally continue SEED PCS's charter. | | | | |
| Performance Management Framework (PMF) Outcomes ⁴ | | | | | |
| 2017 – 18 | 2018 – 19 | 2019 – 20 | 2020 – 21 | 2021 – 22 | Average |
| 65.4% | 67.4% | Not Applicable (NA) ⁵ | | | 66.4% |

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 25-year review of SEED PCS, evaluating its progress toward meeting its goals and academic achievement expectations (charter goals). SEED 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, SEED PCS committed to achieving an average PMF score equal to or exceeding 50.0% over the review period. As the chart above reports, SEED PCS met its goals, earning an average PMF score of 66.4%.

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@dcpcsb.org.

² See the appendices to this report here: <https://bit.ly/39fx18Q>.

³ See SEED PCS's Charter Agreement and Amendments, Appendices A1 – A5.

⁴ See SEED PCS's PMF scorecards, Appendices B1 – B4.

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).

However, as detailed in Section Two of this report, SEED PCS has a concerning history of inconsistent communication and reporting on its procurement contracts. On several occasions throughout the review period, DC PCSB reminded SEED PCS staff of missed deadlines and missing procurement contract submissions. While the school resolved the outstanding contracts for fiscal year (FY) 2021, DC PCSB remains concerned about the school's lack of fidelity to DC PCSB's procurement reporting requirements.

At its public board meeting on January 23, 2023, the DC PCSB Board voted 5 – 0 to continue SEED PCS's charter with the following conditions.

- a. By March 3, 2023, SEED PCS shall submit a draft plan for improving procurement contract submission compliance for DC PCSB's review. At a minimum, the plan must include 1) strategies the school will use to improve internal procedures and 2) a description of how the school will measure the plan's success.

- b. By April 3, 2023, the school shall submit a final procurement contract submission compliance plan that incorporates and addresses, to DC PCSB's satisfaction, any feedback DC PCSB provides. Further, the school must comply with DC PCSB's *Procurement Contract Submission and Conflict of Interest Policy* and *Data and Document Submission and Verification Policy*. Should DC PCSB recognize noncompliance, it will engage SEED PCS's board about needed improvement or take additional action as appropriate under each policy.

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

| SEED PCS | | | |
|---|-----------|-----------------------------------|--|
| Year Opened | 1998 – 99 | Ward(s) | 7 |
| Number of Campuses | 1 | Year(s) of Previous Review | 2003 – 04, 2008 – 09, 2012 – 13, and 2017 – 18 |
| Current Enrollment Ceiling | 250 | Current Enrollment | 255 ⁷ |
| Chartered Grade Span | 9 – 12 | Current Grade Span | 9 – 12 |
| Mission Statement | | | |
| To provide an outstanding intensive residential education program to at-risk inner-city children that prepares them, both academically and socially, for success in college and/or in the professional world. | | | |

School Overview

SEED PCS began operation in 1998 under authorization from DC PCSB, serving students in sixth through twelfth grades. In SY 2017 – 18, during its 20-year charter review, SEED PCS's middle school program (grades six through eight) failed to meet its charter goals.⁸ Consequently, the DC PCSB Board required the school to gradually phase out its middle school program beginning in SY 2018 – 19.⁹ The local education agency (LEA)¹⁰ closed its middle school program at the end of SY 2019 – 20. SEED PCS decreased its enrollment ceiling accordingly.¹¹

The LEA offers a college preparatory curriculum in small classroom settings.¹² SEED PCS operates a boarding program: Students live on campus from Sunday evening to Friday afternoon.¹³ SEED PCS students participate in a Student Life Program from 4:00 pm to 10:00 pm each day. During the program, scholars participate in academic enrichment, social-emotional development, and extra-curricular activities.¹⁴

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

⁸ See SEED PCS's 20-Year Review Report, Appendix C, p. 2.

⁹ See SEED PCS's 2017 Conditions for Continuance Amendment, Appendix A4.

¹⁰ An "LEA" is any individual or group of public charter schools operating under a single charter.

¹¹ Per the school's conditions for continuance amendment, "the school may apply to DC PCSB beginning in SY 2021 – 22 to re-open its middle school grade span. The DC PCSB Board will consider the track record of the high school grade span, the soundness of the proposed middle school plans, and the then extant Enrollment Ceiling Increase policy in determining whether to approve this application," Appendix A4, p. 2.

¹² See SEED PCS's SY 2020 – 21 Annual Report, Appendix D, p. 1.

¹³ SEED PCS receives additional public funding through DC's Uniform Per Student Funding Formula to operate its residential program.

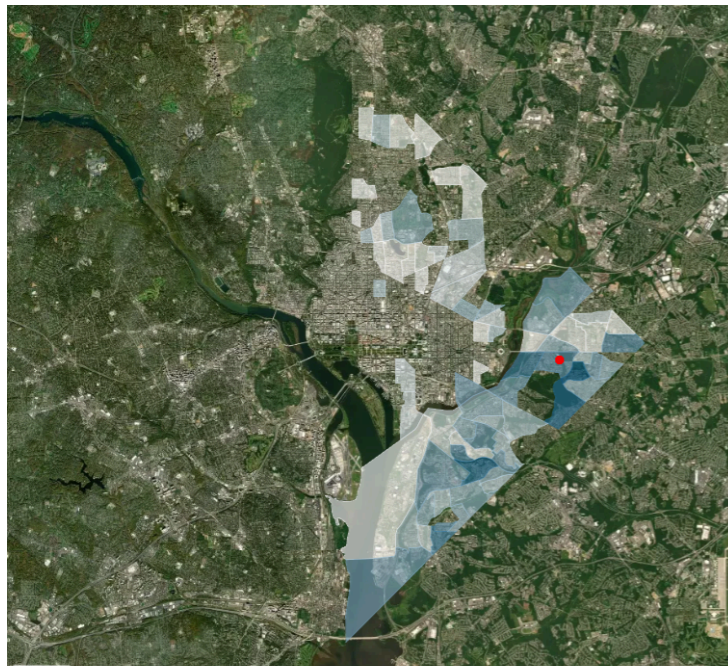
¹⁴ Ibid., p. 1.

Enrollment and Demographic Data

The table below shows the school's enrollment history during the review period.¹⁵

| School Year | 2017 – 18 | 2018 – 19 | 2019 – 20 | 2020 – 21 | 2021 – 22 |
|---|-----------|-----------|-----------|-----------|-----------|
| 6 | 85 | – | – | – | – |
| 7 | 64 | 58 | – | – | – |
| 8 | 54 | 49 | 48 | – | – |
| 9 | 57 | 71 | 75 | 75 | 64 |
| 10 | 48 | 39 | 47 | 72 | 71 |
| 11 | 29 | 37 | 35 | 38 | 64 |
| 12 | 26 | 30 | 31 | 36 | 35 |
| Audited Enrollment ¹⁶ | 363 | 284 | 236 | 221 | 241 |
| Enrollment Projections ¹⁷ | 355 | 300 | 225 | 219 | 240 |
| Enrollment Ceiling | 500 | 300 | 250 | 250 | 250 |

The map below shows where SY 2021 – 22 SEED 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 SEED PCS students come from Wards 7 and 8.



¹⁵ The “–” symbol indicates the school does not or did not enroll students in the corresponding grade(s) or student group(s).

¹⁶ 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.

¹⁷ 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.

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

| Student Group | Percentage Enrolled |
|---|----------------------------|
| At-Risk Students ¹⁸ | 72.2% |
| English Learners ¹⁹ | 0.4% |
| Students with Disabilities (SWD) ²⁰ | 21.4% |
| American Indian or Alaska Native | – |
| Asian | – |
| Black or African American | 96.4% |
| Hispanic/Latino | 2.4% |
| Multiracial | – |
| Native Hawaiian or Other Pacific Islander | 0.4% |
| White | – |

School Climate

The charts below report SEED 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 do not factor into DC PCSB's continuance determination. Still, isolating school environment measures by student groups helps to identify whether there may be access and opportunity disparities.²¹

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

¹⁸ 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.

¹⁹ 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.

²⁰ 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.

²¹ 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 staff 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 SEED PCS's average OSS rates by grade band and student group compared to the DC public charter sector's average OSS rates.²²

| Key for OSS and MYW Rates | |
|---------------------------|---|
| Green | Equal to or less than the sector rate |
| Red | More than the sector rate |
| Grey | n < 10; the number of students (n-size) is less than 10 ²³ |

| Two-Year (SY 2017 – 18 and SY 2018 – 19) Average OSS Rate | | | | |
|---|---------------------|------------------|------------------|----------------------------|
| School/Sector | Grade Band | At-Risk Students | English Learners | Students with Disabilities |
| SEED PCS | 6 – 8 ²⁴ | 27.6% | n < 10 | 34.6% |
| Sector | | 17.1% | 8.7% | 21.5% |
| SEED PCS | 9 – 12 | 29.2% | n < 10 | 35.1% |
| Sector | | 17.8% | 8.6% | 19.2% |

| SY 2019 – 20 Average OSS Rates | | | | |
|--------------------------------|------------|------------------|------------------|----------------------------|
| School/Sector | Grade Band | At-Risk Students | English Learners | Students with Disabilities |
| SEED PCS | 6 – 8 | 16.7% | n < 10 | NA |
| Sector | | 10.4% | 4.6% | 13.2% |
| SEED PCS | 9 – 12 | 31.2% | n < 10 | 36.4% |
| Sector | | 14.2% | 4.0% | 17.3% |

| SY 2021 – 22 Average OSS Rates | | | | |
|--------------------------------|------------|------------------|------------------|----------------------------|
| School/Sector | Grade Band | At-Risk Students | English Learners | Students with Disabilities |
| SEED PCS | 9 – 12 | 0.0% | n < 10 | 0.0% |
| Sector | | 13.4% | 6.2% | 13.6% |

MYW Rates

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

²² For SY 2020 – 21, DC PCSB determined the number of students suspended across the charter sector, including SEED PCS, is too small to report.

²³ DC PCSB does not report values when the n-size is less than 10.

²⁴ While SEED PCS closed its middle school program in SY 2019 – 20, the following school climate data reports the LEA's middle school grade band for all applicable years in the review period. DC PCSB includes this school climate data to present a more complete picture of the school's environment.

| Two-Year (SY 2017 – 18 and SY 2018 – 19) Average MYW Rates | | | | |
|--|------------|------------------|------------------|----------------------------|
| School/Sector | Grade Band | At-Risk Students | English Learners | Students with Disabilities |
| SEED PCS | 6 – 8 | 13.1% | n < 10 | 15.4% |
| Sector | | 5.5% | 4.4% | 5.5% |
| SEED PCS | 9 – 12 | 10.4% | n < 10 | 6.5% |
| Sector | | 10.5% | 7.9% | 9.4% |

| SY 2019 – 20 Average MYW Rate | | | | |
|-------------------------------|------------|------------------|------------------|----------------------------|
| School/Sector | Grade Band | At-Risk Students | English Learners | Students with Disabilities |
| SEED PCS | 6 – 8 | 4.2% | n < 10 | n < 10 |
| Sector | | 3.3% | 1.4% | 3.7% |
| SEED PCS | 9 – 12 | 10.4% | n < 10 | 13.6% |
| Sector | | 6.3% | 4.9% | 7.1% |

| SY 2020 – 21 Average MYW Rate | | | | |
|-------------------------------|------------|------------------|------------------|----------------------------|
| School/Sector | Grade Band | At-Risk Students | English Learners | Students with Disabilities |
| SEED PCS | 9 – 12 | 2.6% | n < 10 | 2.4% |
| Sector | | 2.3% | 2.2% | 2.0% |

| SY 2021 – 22 Average MYW Rate | | | | |
|-------------------------------|------------|------------------|------------------|----------------------------|
| School/Sector | Grade Band | At-Risk Students | English Learners | Students with Disabilities |
| SEED PCS | 9 – 12 | 14.4% | n < 10 | 18.5% |
| Sector | | 4.4% | 4.5% | 7.5% |

ISA Rates

The ISA rate is the percentage of students who were present each day. The charts below detail SEED 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 |
| SEED PCS | 6 – 8 | 93.6% | n < 10 | 92.5% |
| Sector | | 91.9% | 94.6% | 92.0% |
| SEED PCS | 9 – 12 | 94.0% | n < 10 | 92.4% |
| Sector | | 88.5% | 89.9% | 88.4% |

| SY 2019 – 20 Average ISA Rates | | | | |
|--------------------------------|------------|------------------|------------------|----------------------------|
| School/Sector | Grade Band | At-Risk Students | English Learners | Students with Disabilities |
| SEED PCS | 6 – 8 | 92.6% | n < 10 | n < 10 |
| Sector | | 92.5% | 94.4% | 91.9% |
| SEED PCS | 9 – 12 | 96.0% | n < 10 | 93.2% |
| Sector | | 89.3% | 91.5% | 88.7% |

| SY 2020 – 21 Average ISA Rates | | | | |
|--------------------------------|------------|------------------|------------------|----------------------------|
| School/Sector | Grade Band | At-Risk Students | English Learners | Students with Disabilities |
| SEED PCS | 9 – 12 | 89.0% | n < 10 | 88.0% |
| Sector | | 88.4% | 91.5% | 88.3% |

| SY 2021 – 22 Average ISA Rates | | | | |
|--------------------------------|------------|------------------|------------------|----------------------------|
| School/Sector | Grade Band | At-Risk Students | English Learners | Students with Disabilities |
| SEED PCS | 9 – 12 | 70.8% | n < 10 | 66.8% |
| Sector | | 81.1% | 85.6% | 81.2% |

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*.²⁵ From April 18 – 29, 2022, in anticipation of this review, DC PCSB conducted a QSR at SEED PCS.²⁶ In the classroom environment domain, observers noted that most interactions between teachers and students, and among students, were positive. Teachers established a rapport with students and often asked about their lives outside of school. In some classrooms, off-

²⁵ Danielson, Charlotte. *The Framework for Teaching: Evaluation Instrument*. Princeton, NJ: Danielson Group, 2013.

²⁶ See SEED PCS's SY 2021 – 22 QSR Report, Appendix E.

task behaviors and frequent redirections from the teacher resulted in some loss of instructional time. In the instruction domain, observers noted that teachers clearly explained the lesson purpose and often modeled various strategies students could use when completing their work. Teachers often asked rapid-fire questions with a single correct answer, resulting in limited student participation during academic discussions.

After conducting unannounced observations,²⁷ the QSR team rated the classroom environment and instruction as “unsatisfactory,” “basic,” “proficient,” or “distinguished.” The following chart details the percentage of SEED 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 that received proficient and distinguished ratings in each domain.

| Campus | Classroom Environment | Instruction |
|---|-----------------------|-------------|
| Percentage Rated Proficient or Distinguished | | |
| SEED PCS | 75.0% | 66.0% |
| Average score for 9 – 12 public charter schools | 90.0% | 85.0% |

SEED PCS scored below average in both domains compared to other public charter high 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 SEED 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.²⁸ 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.²⁹

Of the five ELA samples submitted, all five assignments received an overall rating of “sufficient.” These assignments were based on a high-quality, grade-appropriate text and reached the full depth of the targeted standard.

²⁷ 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.

²⁸ See the protocol here: <https://bit.ly/3PFYLKH>.

²⁹ 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.”

Of the five math samples submitted, four assignments received an overall rating of “minimal.” These assignments did not reach the depth of the targeted standard. One assignment received an overall rating of “no opportunity.” This assignment did not align to a grade-level standard.

Previous Charter Reviews

Five-Year Review

In SY 2003 – 04, DC PCSB conducted a five-year review of SEED PCS.³⁰ DC PCSB determined the school met one out of 11 academic targets and three out of four non-academic performance standards. However, DC PCSB concluded the school failed to meet the majority of its academic targets because the targets were unclear. Based on this review, the DC PCSB Board issued a Notice of Conditional Continuance,³¹ requiring the school to:

- a. develop an internal assessment for reading and math;
- b. conduct professional development for these new assessments; and
- c. develop an assessment to measure how students improve life skills through the boarding program.

In November 2004, DC PCSB voted to conditionally continue the school's charter.

10-Year Review

In SY 2008 – 09, DC PCSB conducted a 10-year review of SEED PCS and found the school met the standard for charter continuance.³² DC PCSB determined SEED PCS met all seven academic performance targets but did not meet its three non-academic standards. In January 2009, DC PCSB voted to continue the school's charter.

15-Year Renewal

In SY 2012 – 13, DC PCSB conducted a 15-year renewal of SEED PCS and found the school met the standard for charter renewal.³³ DC PCSB determined SEED PCS fully met 11 out of 12 charter goals and partially met one goal. Per the 15-year renewal report, DC PCSB encouraged the LEA to set ambitious goals in its renewed charter agreement.³⁴ The new charter goals would ideally assess the benefits of the school's boarding model. In July 2013, DC PCSB voted to renew SEED PCS's charter for another 15-year term.

20-Year Review

³⁰ See SEED PCS's Five-Year Review Executive Summary, Appendix F.

³¹ See SEED PCS's Notice of Conditional Continuance, Appendix G.

³² See SEED PCS's 10-year Review Report, Appendix H.

³³ See SEED PCS's 15-year Renewal Report, Appendix I.

³⁴ Ibid., p. 3.

In SY 2017 – 18,³⁵ DC PCSB conducted a 20-year review of SEED PCS. Ahead of its 20-year review, the LEA adopted the PMF as its goals, agreeing to achieve an average PMF score equal to or exceeding 50.0% in both its high school and middle school programs. The high school program (grades 9 through 12) met the PMF target. However, the middle school program missed the PMF target and failed to qualify for the improvement provision in the school's charter agreement.³⁶ As such, the DC PCSB Board determined the LEA did not meet its charter goals, and it required SEED PCS to close its middle school program as a condition of charter continuance. In December 2017, DC PCSB voted to conditionally continue the school's charter, committing the school to the following:

- The school will cease admitting new students in the 6th, 7th, and 8th grades, beginning immediately, and the middle school will close completely by the end of SY 2019 – 20.
- The school's enrollment ceiling will decrease to 300 in SY 2018 – 19, and 250 in SY 2019 – 20 and beyond.
- The school will admit students in both the 9th and 10th grades by SY 2020 – 21.
- The school's goals (achieving an average score of 50.0% on the PMF over the next five years) will be amended to eliminate the middle school from the calculation for the school's 25th year review and beyond.
- In any year that the school's overall retention rate for high school (comparing the previous year's official October enrollment count roster for 9th, 10th, and 11th graders with the current year's official October enrollment count roster for 10th, 11th, and 12th graders) is 90.0% or greater, it will receive an enrollment ceiling increase of 25, up to a maximum of 300.
- The school may apply to DC PCSB beginning in SY 2021 – 22 to re-open its middle school grade span. The DC PCSB Board will consider the track record of the high school grade span, the soundness of the proposed middle school plans, and the then extant Enrollment Ceiling Increase policy in determining whether to approve this application.

Communication with the School

On June 14, 2022, DC PCSB staff met with SEED PCS staff to discuss the school's 25-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.

³⁵ See SEED PCS's 20-year Review Report, Appendix C.

³⁶ Per SEED PCS's Charter Agreement, in cases where the school has not achieved the 50.0% PMF threshold, 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 demonstrated consistent improvement on overall PMF's scores on each PMF over the five-year period," Appendix A3, pp. 2 – 3. SEED PCS's middle school program failed to show improvement throughout the five-year period before the LEA's 20-year review.

CHARTER REVIEW STANDARD

The SRA stipulates that DC PCSB "shall review [a school's] charter at least once every [five] years."³⁷ 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.³⁸

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.³⁹

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.⁴⁰

³⁷ D.C. Code § 38-1802.12(a)(3).

³⁸ D.C. Code § 38-1802.13(a).

³⁹ DC PCSB may impose conditions of continuance if it deems such conditions appropriate.

⁴⁰ 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 September 2016,⁴¹ SEED PCS amended its charter agreement to adopt the High School (HS) PMF as its charter goals. In January 2018,⁴² the DC PCSB Board approved updates to the school's charter agreement to reflect the review standard and improvement provision recorded in the chart below. The chart also reports DC PCSB's determination that SEED PCS met its charter goals.

| Charter Goals | Met? |
|--|------------|
| <p>Review Standard: At its 25-year charter review in SY 2022 – 23, the high school program (grades 9 through 12) earns an average PMF score for SYs 2017 – 18, 2018 – 19, 2019 – 20, 2020 – 21, and 2021 – 22 equal to or exceeding 50.0%.</p> <p>Improvement Provision: In cases where the school has not achieved the above threshold, the DC PCSB Board may, at its discretion, determine that a school has met its charter goals if the [LEA] has demonstrated consistent improvement on overall PMF scores on each PMF over the five-year period.</p> | Met |

| PMF Outcomes | | | | | |
|--------------|-----------|------------------|-----------|-----------|--------------|
| 2017 – 18 | 2018 – 19 | 2019 – 20 | 2020 – 21 | 2021 – 22 | Average |
| 65.4% | 67.4% | NA ⁴³ | | | 66.4% |

Determination: SEED PCS met its charter goals, exceeding the targeted PMF average of 50.0%.

The remainder of this section contains a description of the PMF and an analysis of SEED PCS's performance in each PMF category during the review period, excluding school years 2019 – 20, 2020 – 21, and 2021 – 22 per footnote 43. This section ends with supplemental academic data, separate and apart from the school's charter goals.

⁴¹ See SEED PCS's Goals Charter Amendment, Appendix A2.

⁴² See SEED PCS's Goals Charter Amendment, Appendix A4.

⁴³ 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>.

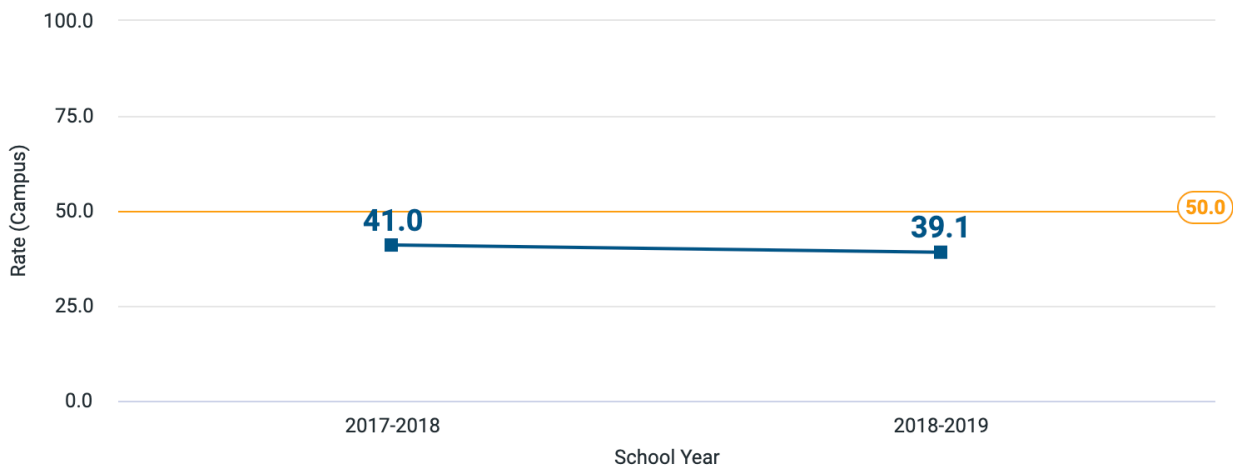
PMF Overview⁴⁴

At the time of this review, DC PCSB evaluates all public charter schools according to a PMF. There are four separate PMF frameworks; DC PCSB evaluates SEED PCS under the High School (HS) PMF. DC PCSB divides the PMF into four categories: student progress, student achievement, gateway, and school environment. Using a 100-point scale, the HS 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 SEED PCS's performance in each of the PMF categories, including charts detailing SEED PCS's outcomes in each of the PMF categories compared to the sector.⁴⁵

Student Progress

Student progress is a measure of student growth over the course of a year. For high schools, 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.

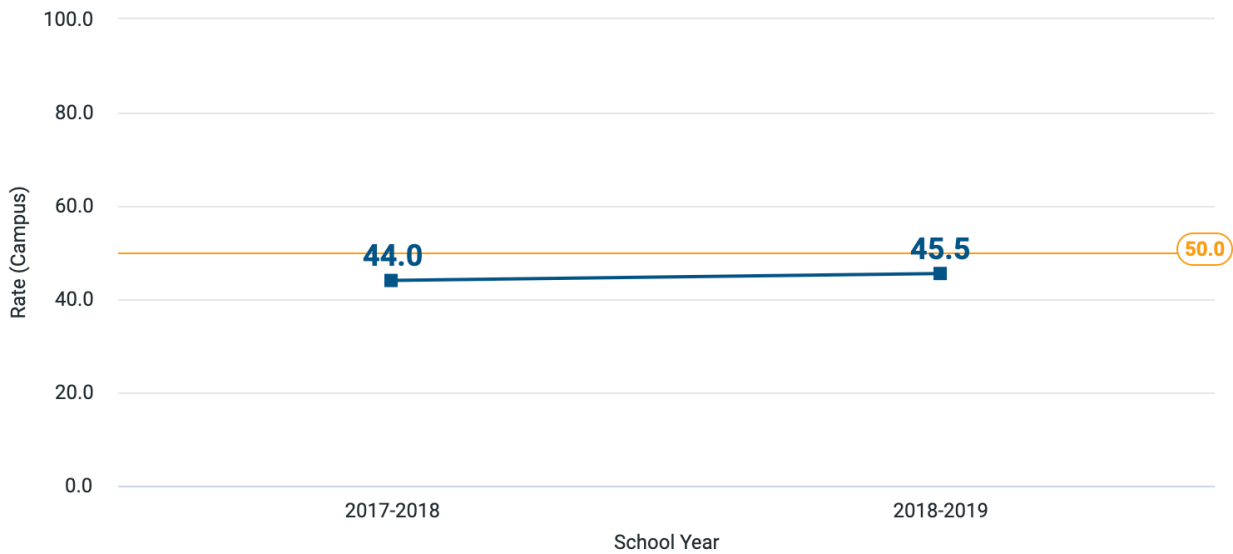
ELA MGP



⁴⁴ For details, see the *2019 – 20 PMF Policy and Technical Guide* here: <https://bit.ly/2D2lvqc>.

⁴⁵ 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.

Math MGP



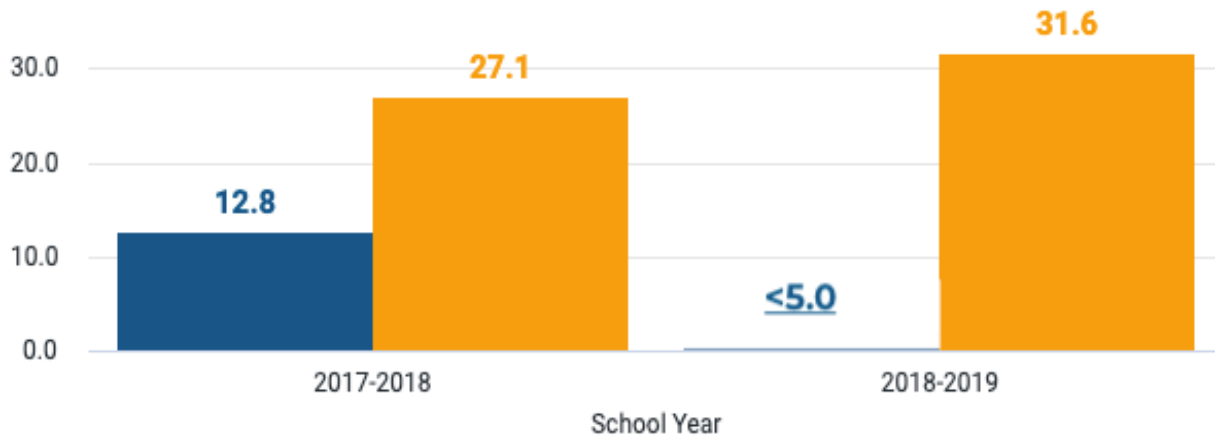
Student Achievement

The student achievement category captures overall student performance on the PARCC assessment, with level 4+ considered proficient and advanced.⁴⁶ 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.

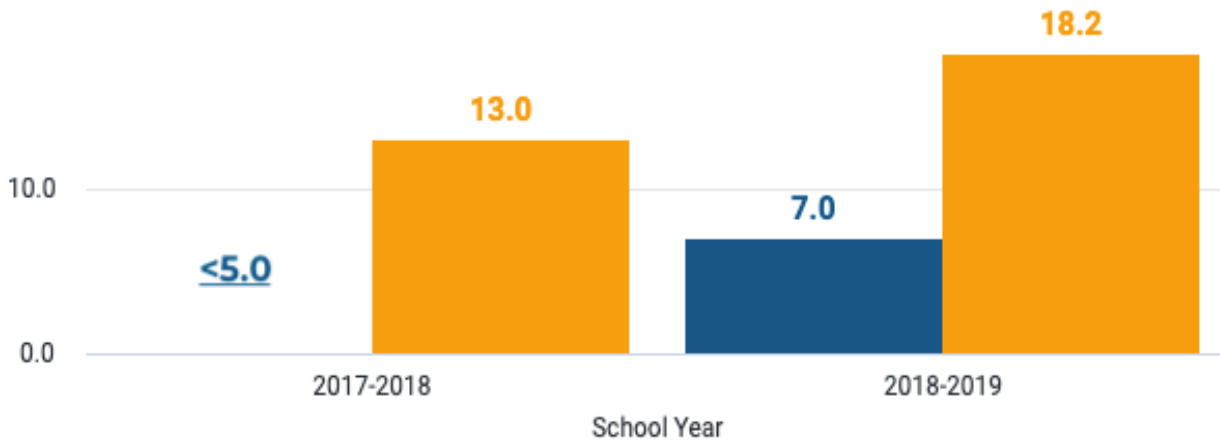


⁴⁶ The term "4+" refers to level 4 and level 5 PARCC scores. A student who earns a level 4 is considered proficient. A student who earns a level 5 is considered advanced.

ELA Proficiency (Overall)⁴⁷



Math Proficiency (Overall)



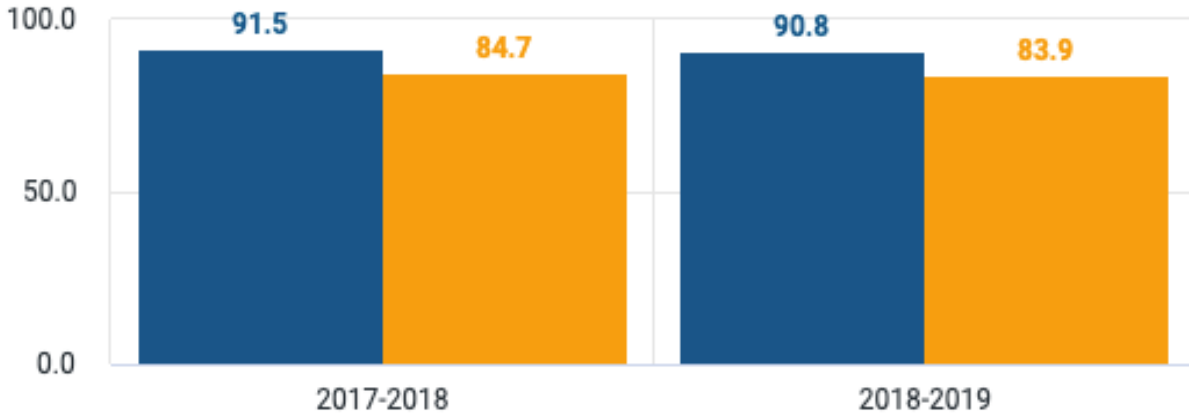
Gateway

The gateway category includes grade-specific measures that predict students' future academic performance. The HS PMF gateway measures are described below.

⁴⁷ In cases of sensitive, negative data at rates greater than 95.0% or less than 5.0%, the data is suppressed.

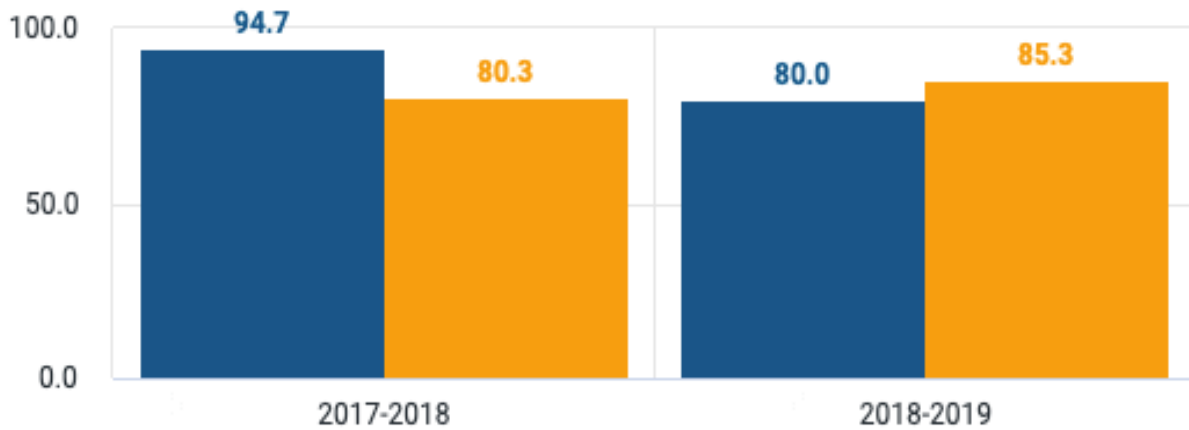
9th Grade on Track

This measure reports the percentage of 9th graders who earned enough credits in their freshman year to be on track to graduate from high school in four years. The chart below shows the school's 9th Grade on Track performance compared to the sector.



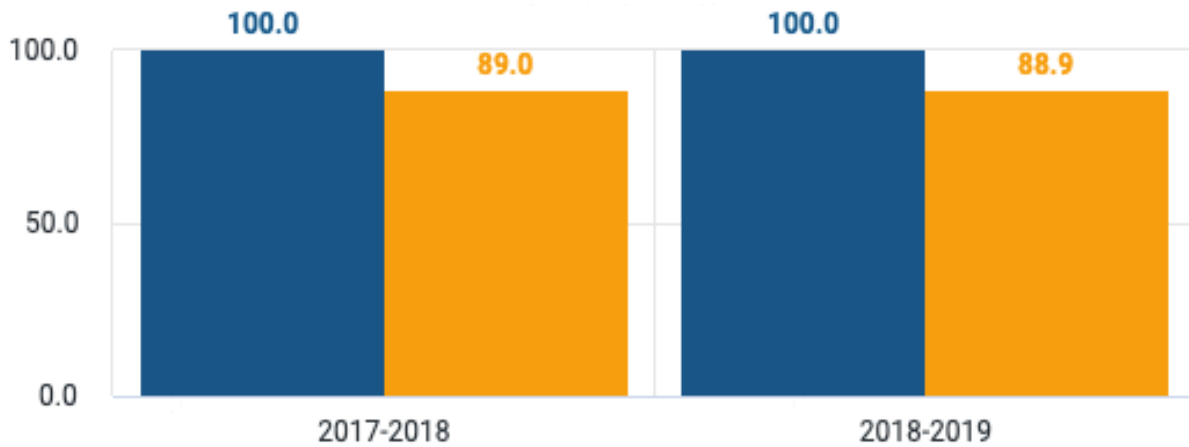
Four-Year Adjusted Cohort Graduation Rate (ACGR)

This measure reports the percentage of 9th graders who graduated in four years. The chart below shows the school's four-year ACGR performance compared to the sector average.



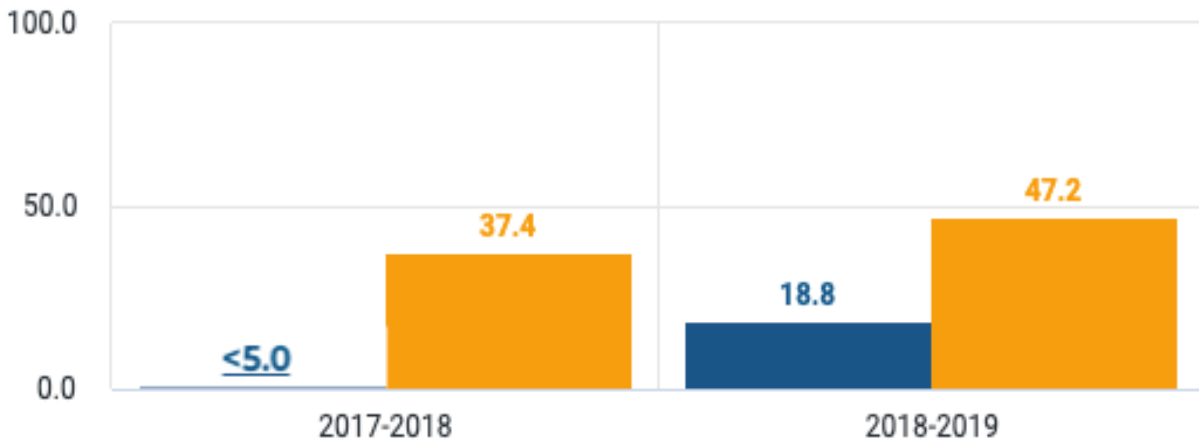
Five-Year ACGR

This measure reports the percentage of 9th graders who graduated in five years. The chart below shows the school's five-year ACGR performance compared to the sector.



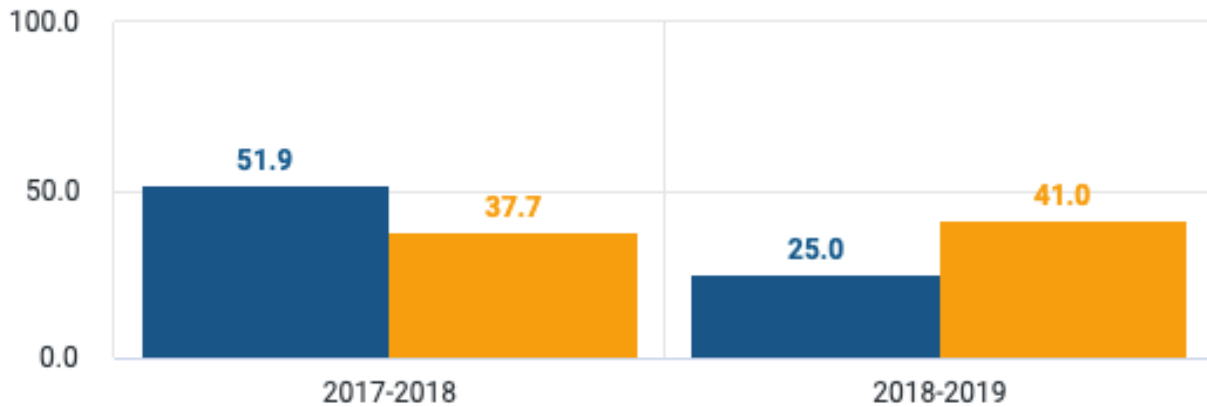
College Readiness: Advanced Placement (AP)/International Baccalaureate (IB)/Dual Enrollment (DE)/Career and Technical Education (CTE) Certification

This measure reports the percentage of students who scored 3 or above on AP exams, scored 4 or above on IB exams, earned a C or better in dual enrollment courses, or earned a CTE certificate. The chart below shows the school's college readiness performance compared to the sector.



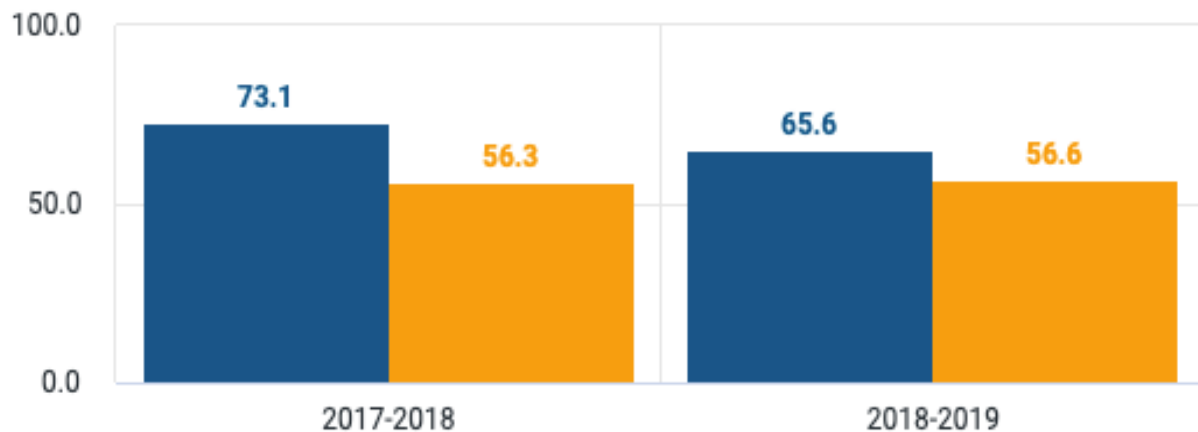
PSAT Performance

This measure reports the percentage of 11th graders who scored 850 or above on the combined reading and math sections of the PSAT.



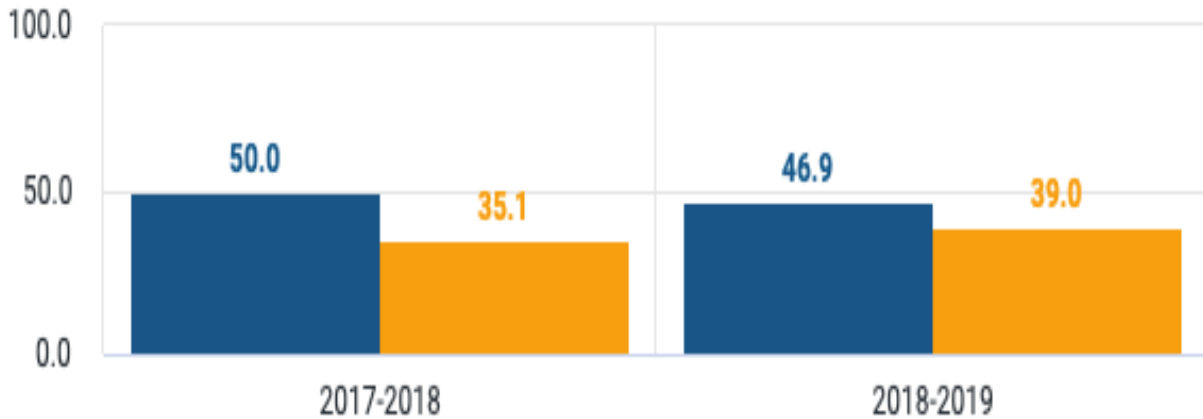
SAT/ACT Performance

This measure reports the percentage of 12th graders who scored 890 or above on the combined reading and math sections of the SAT or who have a composite score of 16 or above on the ACT. The chart below shows the school's SAT/ACT performance compared to the sector average.



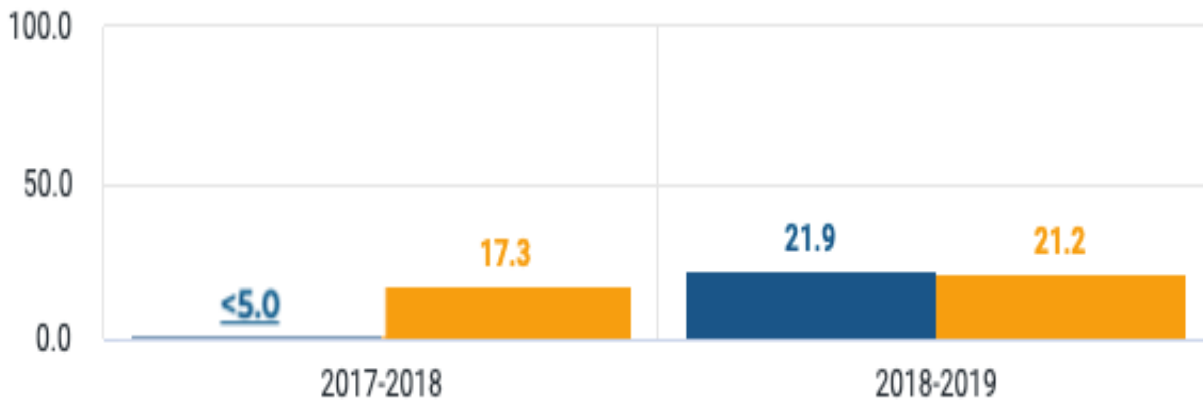
SAT/ACT College Ready: Evidence-Based Reading and Writing (ERW)

This measure reports the percentage of 12th graders who scored “college ready” (i.e., an SAT score of 480 or more, or an ACT score of 20 or more) on the reading section of the SAT or ACT. The chart below shows the school’s SAT/ACT ERW performance compared to the sector average.



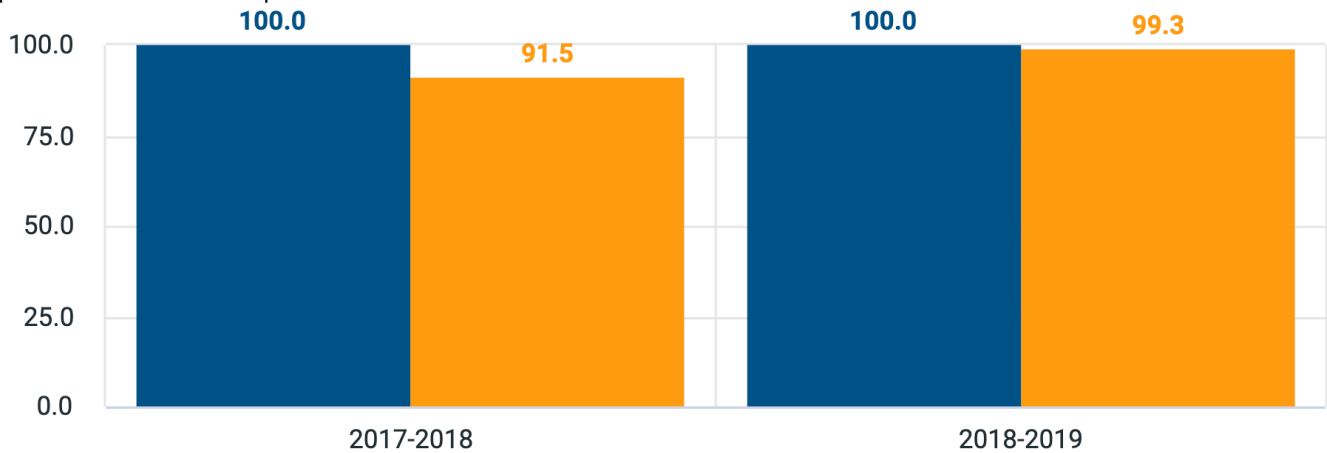
SAT/ACT College Ready: Math

This measure reports the percentage of 12th graders who scored “college ready” (i.e., an SAT score of 530 or more, or an ACT score of 22 or more) on the math section of the SAT or ACT.



College Acceptance

This measure reports the percentage of graduates who were admitted to a two- or four-year college or university. The chart below shows the school's college acceptance performance compared to the sector.

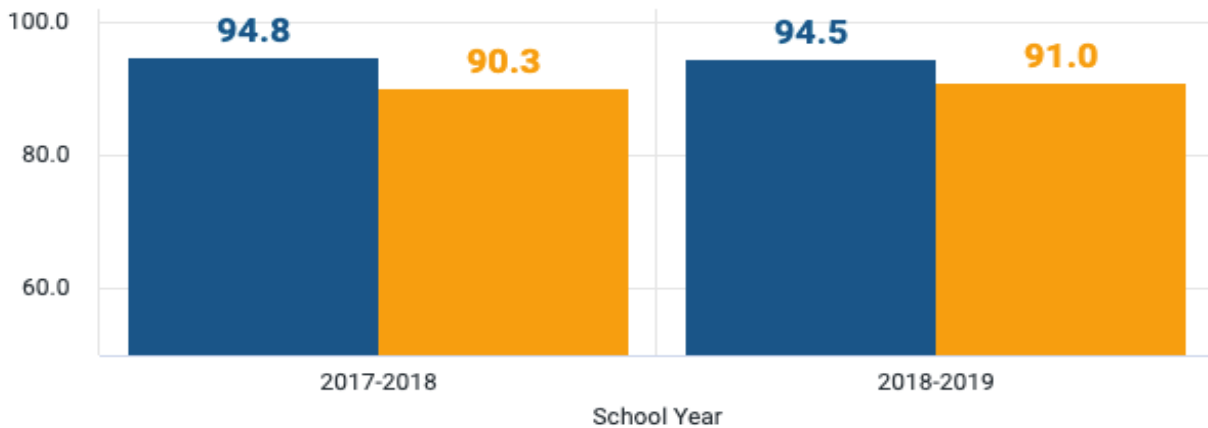


School Environment

The school environment category includes in-seat attendance rates and re-enrollment rates. The following charts detail the school's performance on each of these measures. 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.

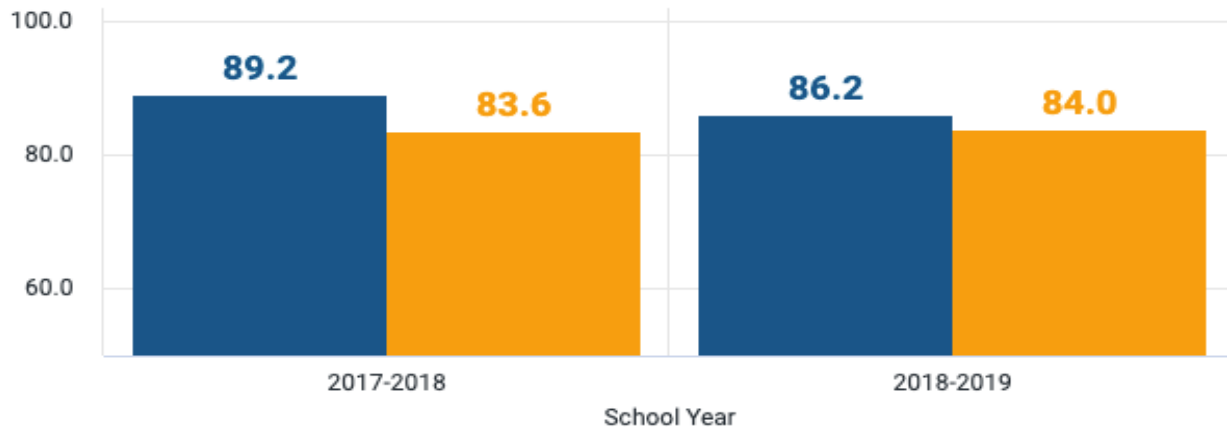
ISA

The ISA rate measures the daily average percentage of enrolled students who were present in school. The chart below shows 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.⁴⁸ The chart below shows the school's re-enrollment rates compared to the sector.



Additional Data

Student Group Academic Data

The following charts present academic data by student group.⁴⁹ 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 school's academic data 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 | n < 10; The number of test takers (n-size) is less than 10 |

⁴⁸ For eligibility criteria, see the 2019 – 20 PMF Policy & Technical Guide here: <https://bit.ly/3aRYFW2>.

⁴⁹ Student group academic data does not report on closed grade bands or campuses. As such, SEED PCS's middle school grades are not included.

ELA MGP Growth by Student Group

| School Year | 2017 – 18 | | 2018 – 19 | |
|---------------------------|-------------|-------------|-------------|-------------|
| Student Group | School Rate | Sector Rate | School Rate | Sector Rate |
| At-Risk | 39.0% | 38.0% | 37.7% | 38.0% |
| Black or African American | 41.0% | 38.5% | 39.1% | 39.5% |
| Female | 43.5% | 42.0% | 33.7% | 42.0% |
| Male | 41.0% | 38.0% | 39.4% | 40.0% |

Math MGP Growth by Student Group

| School Year | 2017 – 18 | | 2018 – 19 | |
|---------------------------|-------------|-------------|-------------|-------------|
| Student Group | School Rate | Sector Rate | School Rate | Sector Rate |
| At-Risk | 43.5% | 49.0% | 44.9% | 55.9% |
| Black or African American | 44.0% | 49.0% | 45.5% | 56.8% |
| Female | 44.0% | 50.0% | 48.6% | 57.4% |
| Male | 45.0% | 52.0% | 43.4% | 58.7% |

ELA 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 | 7.7% | 18.0% | <5.0% | 23.2% |
| Student with Disabilities | n < 10 | 5.3% | <5.0% | 10.4% |
| Black or African American | 12.8% | 22.7% | <5.0% | 28.2% |
| Female | 13.6% | 30.9% | 5.6% | 37.2% |
| Male | 11.8% | 22.9% | <5.0% | 25.7% |

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 | <5.0% | 6.6% | 8.0% | 13.1% |
| Student with Disabilities | n < 10 | 1.9% | <5.0% | 3.5% |
| Black or African American | <5.0% | 9.3% | 7.0% | 14.9% |
| Female | <5.0% | 13.2% | <5.0% | 18.5% |
| Male | <5.0% | 12.9% | 8.7% | 17.9% |

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 grades 9 – 12, transitional goals data may include results from a school-selected, nationally normed growth assessment (this measure was optional for high schools). SEED PCS elected to administer Northwest Evaluation Association (NWEA) Measures of Academic Progress (MAP) as its growth assessment.⁵¹ Transitional goals also include standard data collection, to the extent available, of PARCC (4+), 9th Grade on Track, PSAT, SAT/ACT, AP/IB/DE/CTE, College Acceptance, 4- and 5-Year ACGR, ISA, and re-enrollment. The charts below show SEED PCS's overall and student group performance on each transitional goals measure, excluding its performance on NWEA MAP Math for grades 9 and 10.⁵²

9 – 10 ELA and Math Growth Rates on NWEA MAP by Student Group

| Student Group | 2021 – 22 Median Conditional Growth Percentile (CGP) ⁵³ | | |
|---------------------------|--|-------------|------|
| | n-size | ELA | Math |
| All Students | 177 | 55.0 | NA |
| At-Risk | 127 | 55.0 | |
| SWDs | 30 | 48.0 | |
| Black or African American | 173 | 55.0 | |
| Hispanic/Latino | n < 10 | n < 10 | |
| Female | 88 | 56.5 | |
| Male | 89 | 52.0 | |

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

| Student Group | 2021 – 22 Proficiency Rates | |
|---------------------------|-----------------------------|-----------------|
| | ELA | Math |
| All Students | 12.5% | <5.0% |
| At-Risk | 8.0% | <5.0% |
| SWDs | <5.0% | <5.0% |
| Black or African American | 12.8% | <5.0% |
| Hispanic/Latino | n < 10 | n < 10 |
| Female | 20.0% | <5.0% |
| Male | 6.2% | <5.0% |

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

⁵¹ For more information on the NWEA assessment please see: <https://bit.ly/3Fk5lx2>.

⁵² SEED PCS did not submit SY 2021 – 22 NWEA MAP Math rates to DC PCSB.

⁵³ 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.

9th Grade on Track

| Student Group | 2021 – 22 9 th Grade on Track Rates |
|---------------------------|--|
| All Students | 91.9% |
| At-Risk | 89.1% |
| SWDs | 82.4% |
| Black or African American | 91.7% |
| Hispanic/Latino | n < 10 |
| Female | 93.1% |
| Male | 90.9% |

PSAT

| Student Group | 2021 – 22 PSAT Rates |
|---------------------------|----------------------|
| All Students | <5.0% |
| At-Risk | <5.0% |
| SWDs | <5.0% |
| Black or African American | <5.0% |
| Other Races | n < 10 |
| Female | <5.0% |
| Male | <5.0% |

SAT/ACT

| Student Group | 2021 – 22 SAT/ACT Rates |
|---------------------------|-------------------------|
| All Students | 5.7% |
| At-Risk | <5.0% |
| English Learner | n < 10 |
| SWDs | n < 10 |
| Black or African American | 6.1% |
| Hispanic/Latino | n < 10 |
| Female | <5.0% |
| Male | 7.7% |

SAT/ACT College and Career Ready: ERW

| Student Group | 2021 – 22 SAT/ACT College and Career Ready: ERW Rates |
|---------------------------|---|
| All Students | 8.6% |
| At-Risk | <5.0% |
| English Learner | n < 10 |
| SWDs | n < 10 |
| Black or African American | 9.1% |
| Hispanic/Latino | n < 10 |
| Female | 9.1% |
| Male | 7.7% |

SAT/ACT College and Career Ready: Math

| Student Group | 2021 – 22 SAT/ACT College and Career Ready: Math Rates |
|---------------------------|--|
| All Students | <5.0% |
| At-Risk | <5.0% |
| English Learner | n < 10 |
| SWDs | n < 10 |
| Black or African American | <5.0% |
| Hispanic/Latino | n < 10 |
| Female | <5.0% |
| Male | <5.0% |

AP/IB/DE/CTE

| Student Group | 2021 – 22 AP/IB/DE/CTE Rates |
|---------------------------|------------------------------|
| All Students | <5.0% |
| At-Risk | <5.0% |
| English Learner | n < 10 |
| SWDs | n < 10 |
| Black or African American | <5.0% |
| Hispanic/Latino | n < 10 |
| Female | <5.0% |
| Male | <5.0% |

College Acceptance

| Student Group | 2021 – 22 College Acceptance Rates |
|---------------------------|------------------------------------|
| All Students | 62.9% |
| At-Risk | 60.9% |
| English Learner | n < 10 |
| SWDs | n < 10 |
| Black or African American | 66.7% |
| Hispanic/Latino | n < 10 |
| Female | 68.2% |
| Male | 53.8% |

4-Year ACGR

| Student Group | 2021 – 22 4-Year ACGR Rates |
|---------------------------|-----------------------------|
| All Students | 82.1% |
| At-Risk | 75.9% |
| English Learner | n < 10 |
| SWDs | 60.0% |
| Black or African American | 81.1% |
| Hispanic/Latino | n < 10 |
| Female | 95.0% |
| Male | 68.4% |

5-Year ACGR

| Student Group | 2021 – 22 5 Year ACGR Track Rates |
|---------------------------|-----------------------------------|
| All Students | 94.6% |
| At-Risk | 91.7% |
| SWDs | n < 10 |
| Black or African American | 94.6% |
| Female | 94.7% |
| Male | 94.4% |

ISA

| 2021 – 22 ISA Rate |
|--------------------|
| 72.9% |

Re-enrollment

| 2021 – 22 Re-enrollment Rate |
|------------------------------|
| 88.3% |

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."⁵⁴ The SRA contains a non-exhaustive list of applicable laws, which DC PCSB monitors in its annual compliance reviews. Since SY 2017 – 18, SEED PCS has been compliant with all applicable laws as captured in DC PCSB's compliance reviews.⁵⁵

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 FY 2018, SEED PCS properly submitted 11 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*,⁵⁶ 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, the school properly submitted eight procurement contract packages. During the annual procurement contract reconciliation process, DC PCSB found the school did not properly submit three contracts. After communicating with the school, SEED PCS properly submitted all relevant documentation. Additionally, SEED PCS received four Early Warning

⁵⁴ D.C. Code § 38-1802.12(a)(3).

⁵⁵ 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 SEED PCS's Compliance Review Reports, Appendices J1 – J5.

⁵⁶ See the *Procurement Contract Submission and Conflict of Interest Policy* here: <https://bit.ly/2QkQign>.

Notices and an Out-of-Compliance Notice for failure to submit contracts in a timely manner.

In FY 2020, SEED PCS properly submitted seven procurement contracts. In FY 2021, the school properly submitted 12 contracts; however, during the annual procurement contract reconciliation process, DC PCSB found the school did not properly submit 10 contracts from the previous fiscal year. After several months of communication with the school, SEED PCS received an Early Warning Notice for failure to submit outstanding contracts awarded in FY 2020. The school subsequently properly submitted all relevant documentation.

Currently, DC PCSB staff has concerns about the LEA's compliance with, and internal procedures for, procurement contract submission requirements. SEED PCS has a history of inconsistent communication about and reporting of its procurement contracts. While the school resolved the outstanding FY 2021 issues, DC PCSB staff remains concerned about the school's lack of fidelity to DC PCSB's procurement reporting requirements. As previously mentioned in this report, staff recommends the DC PCSB Board require, as a condition of charter continuance, the school to create a plan for improving procurement contract submission compliance. DC PCSB will monitor the LEA closely to ensure future compliance.

Special Education Compliance⁵⁷

Charter schools are required to comply with all federal and local special education laws, including the Individuals with Disabilities Education Act (IDEA)⁵⁸ and Section 504 of the Rehabilitation Act of 1973.⁵⁹ OSSE monitors charter schools' compliance with special education laws and shares detailed findings in eight areas captured in the table below.⁶⁰

Of the eight monitored areas, SEED 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: Significant Disproportionality. Further information on OSSE's special education compliance findings is reported in the remainder of this section.

| OSSE Special Education Compliance Review Areas | SEED PCS Compliant All Years of the Review Period | Status of Corrective Action |
|--|---|-----------------------------|
| 1. Annual Determinations | Yes | NA |

⁵⁷ See OSSE's Glossary of Special Education Compliance Terms, Appendix K.

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

⁵⁹ 29 U.S.C. § 794.

⁶⁰ For a description of each review area, see the Special Education Factsheet, Appendix L.

| OSSE Special Education Compliance Review Areas | SEED PCS Compliant All Years of the Review Period | Status of Corrective Action |
|--|---|-----------------------------|
| 2. On-Site Monitoring | Yes | NA |
| 3. IDEA Procedural Timeliness Monitoring a) Initial Evaluation b) Reevaluation | No | Complete |
| 4. Secondary Transition Monitoring | No | Complete |
| 5. Child Find Monitoring | Yes | NA |
| 6. Disproportionate Representation and Significant Discrepancy Review | Yes | NA |
| 7. Significant Disproportionality Review | No | Complete |
| 8. Hearing Officer Determination and State Complaint Implementation Review | Yes | NA |

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, SEED PCS received a “Meets Requirements” designation in its 2017 through 2020 Determinations.

| Year | Percent Compliant with Audited Special Education Federal Requirements | Determination Level |
|------|---|---------------------|
| 2017 | 80.7% | Meets Requirements |
| 2018 | 80.7% | Meets Requirements |
| 2019 | 94.1% | Meets Requirements |
| 2020 | 89.5% | 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). OSSE has not flagged SEED PCS for on-site monitoring during the review period.

3. IDEA Procedural Timeliness

OSSE monitors schools in two areas related to the timeliness of creating and maintaining compliant Individualized Education Programs (IEPs) for students: Initial Evaluation and Reevaluation.

*Initial Evaluation*⁶¹

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

- July 1, 2017 – June 30, 2018
- January 1, 2019 – June 30, 2019
- January 1, 2020 – March 31, 2020

For comparison, across the last five years, SEED PCS performed better than 49.2% of charter LEAs, receiving a finding in three reporting periods out of the 10 applicable reporting periods.⁶² OSSE confirms the school addressed findings from SY 2017 – 18 through SY 2019 – 20.

*Reevaluation*⁶³

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 SEED PCS for noncompliance for not adhering to the required reevaluation timeline during the following periods:

- April 1, 2018 – June 30, 2018
- October 1, 2018 – March 31, 2019

For comparison, across the last five years, SEED PCS performed better than 71.2% of charter LEAs, receiving a finding in two reporting periods out of the 13 applicable reporting periods.⁶⁴ OSSE confirms the school addressed the SY 2018 – 19 findings.

4. Secondary Transition Monitoring⁶⁵

The IDEA requires that transition planning (including the development of a plan with transition goals) for students who receive special education services and have an IEP

⁶¹ See SEED PCS's Initial Evaluation Reports, Appendices M1 – M3.

⁶² 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.

⁶³ See SEED PCS's Reevaluation Reports, Appendices N1 – N2.

⁶⁴ 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.

⁶⁵ See SEED PCS's Secondary Transition Monitoring Report, Appendix O.

must begin by age 16. OSSE flagged SEED PCS for noncompliance with secondary transition requirements during SY 2020 – 21.

For comparison, across the last five years, SEED PCS performed better than 68.4% of charter LEAs, receiving a finding in one reporting period out of the seven applicable reporting periods.⁶⁶ Half of applicable charter LEAs received no findings in any reporting period. OSSE confirms the school addressed the finding issued above.

5. Child Find Monitoring Report

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 has not flagged SEED PCS for Child Find monitoring activities during the review period.

6. 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. During the review period, OSSE determined SEED PCS does not have disproportionate representation.

Significant Discrepancy Review

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

7. 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. In notification letters issued in August 2019 and July 2020, OSSE found SEED PCS had significant disproportionality due to discipline.

For comparison, approximately 16.0% of charter LEAs were flagged for significant disproportionality noncompliance in the discipline category since SY 2019 – 20. In its July 2020 notification letter to the school, OSSE required SEED PCS to reserve 15.0% of its Part B IDEA funding for Comprehensive Coordinated Early Intervention Services. OSSE also required the school to submit documentation (e.g., discipline policies and procedures), and attend technical assistance webinars. OSSE confirms the school

⁶⁶ Out of the seven reporting periods, the LEA with the highest number of reporting periods with a finding for Secondary Transition had a finding in two.

addressed these required actions.

8. 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. No HODs have been issued against SEED PCS during the review period.

State Complaints

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 or the provision of a Free and Appropriate Public Education (FAPE) to such child. No state complaints have been filed against SEED PCS during the review period.

SECTION THREE: FISCAL MANAGEMENT AND ECONOMIC VIABILITY⁶⁷

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.⁶⁸

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 SEED PCS for FY 2017 through FY 2021.⁶⁹

Summary of Findings⁷⁰

The school 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 robust financial health in the five-year period between FY 2017 and FY 2021, with above-sector median sustainability and liquidity measures at fiscal year-end (FYE) 2021.
- Enrollment declined from FY 2019 to FY 2021, with the gradual closure of SEED PCS's middle school program, which led to decreases in net assets in FY 2019 and FY 2020. This is not a cause for concern, as enrollment increased in FY 2022 and is projected to reach its ceiling in FY 2023. Additionally, the school has effectively managed its costs and maintained robust sustainability measures throughout the five-year period.
- The owned buildings and improvements, and advantageous lease terms for the land, resulted in occupancy expenses below the DC facilities funding received. The school's current lease expires at FYE 2030.

⁶⁷ Each percentage in Section Three of this report has been rounded to the nearest whole percentage.

⁶⁸ See D.C. Code § 38-1802.13(b).

⁶⁹ See the school's FAR Reports, Appendices P1 – P5.

⁷⁰ See Financial Definitions and Examples, Appendix Q.

| Key for Finance Charts | |
|------------------------------|---|
| 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 Q.

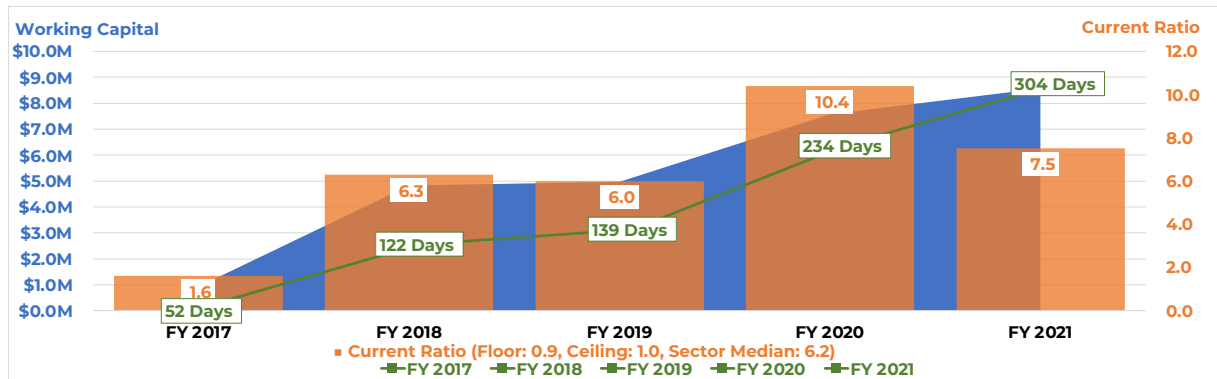
Key Metrics and Comparisons

Enrollment and Operations

The school's changes in net assets have been positive each year from FY 2017 to FY 2021, except for \$0.1M and \$0.2M decreases in net assets in FY 2019 and FY 2020, respectively. The school's enrollment declined 39%, from 363 in FY 2018 to 221 in FY 2021 due to the elimination of its middle school program. The reduction in DC funding from the discontinuation of its middle school program decreased net assets in FY 2019 and FY 2020. In FY 2021, the school generated a positive change in net assets due to the recognition of the forgiveness of its \$1.5M Paycheck Protection Program (PPP) loan and the decrease in personnel salaries and benefits in connection with the elimination of grade eight. In the coming years, the school must continue to focus on cost management to generate surpluses in the absence of DC funding for middle school enrollment and COVID-19 relief funding. This is not currently a cause for concern, as the school's primary reserve ratio is robust at 1.8 at FYE 2021, significantly above 0.2 target and 0.6 sector median. Additionally, enrollment increased in FY 2022 to 248, and is projected to reach the 250 ceiling in FY 2023.

Additionally, due to the steady decrease in operating expenses that averaged \$1.7M (12%) in the three-year period between FY 2019 and FY 2021, the school's share of operating expenses allocated to general expenses, that includes a significant share of fixed costs, has grown by 8% from FY 2017 to FY 2021 to 16%, 5 percentage points above the 11% sector median. This is not a cause for concern, as the school allocates a percentage of operating expenses in line with the sector medians to its academic programs. The school will need to continue to focus on containing general expenses costs in subsequent years to further benefit students.

Liquidity



The school's liquidity has become increasingly strong in the five-year period between FY 2017 and FY 2021. Days of cash on hand and working capital increased each year from FYE 2017 through FYE 2021. At FYE 2021, the school had 304 days of cash on hand, significantly above the 45-day target and 165-day sector median. The current ratio in the same five-year period averaged 6.0, and at FYE 2021 was above the 1.0 target and 6.2 sector median. In the five-year period, the school generated positive cash flow from operations margins. Despite the FY 2019 and FY 2020 negative changes in net assets, the school was able to continue to increase its cash and cash equivalents mainly due to COVID-19 relief funding and noncash expenses (e.g., depreciation).

Facilities and Occupancy

The school's occupancy expenses as a percentage of the DC facility funding remained below the FY 2021 117% sector median in the five-year period between FY 2017 and FY 2021 and in FY 2022 (unaudited). In FY 2000, the school entered into a 15-year operating lease for land, which was extended in FY 2015 to expire in FY 2030. This allows the school to use the constructed buildings and site improvements for its full economic life. In FY 2021, the school's occupancy expenses as a percentage of facilities revenues were 85%, or 32% below the sector median. The school's \$26 occupancy expenses per square foot is also below the \$30 sector median. By incurring lower occupancy costs than the sector median, more funds are available to invest in educating the students.

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 | \$17.5M | \$19.0M | \$18.9M | \$18.7M | \$21.1M | NA | \$6.0M |  |
| Operating Expenses | \$15.7M | \$16.7M | \$15.0M | \$13.0M | \$11.4M | NA | \$10.6M |  |
| Primary Reserve Ratio (Higher is better) | 1.1 | 1.1 | 1.3 | 1.4 | 1.8 | >= 0.2 | 0.6 |  |
| Debt Ratio (Lower is better) | 0.2 | 0.2 | 0.1 | 0.2 | 0.1 | <= 0.5 | 0.4 |  |

In the five-year period from FY 2017 to FY 2021, the primary reserve ratio demonstrated an upward trend and steadily remained above sector median, due to the positive changes in net assets in FY 2017, FY 2018, and FY 2021, coupled with effective cost management also in FY 2019 and FY 2020, when net assets barely decreased. From FY 2017 to FY 2021, net assets increased by 21% while operating expenses decreased by 27%, thereby significantly improving the school’s sustainability. The debt ratio has remained low and in the target range in the five-year period between fiscal year-end (FYE) 2017 and FY 2021, mainly due to the relatively low debt leverage. The school’s only note payable at FYE 2021 consists of \$3.0M to finance capital expenditures, with \$2.0M outstanding balance at FYE 2021.

Audit Findings

The FY 2017 audit identified two significant deficiencies regarding audit adjustments and documentation for approval for salary changes. The school resolved both findings in FY 2018, mainly with the implementation of procedures that ensure processes for reconciliation of all accounts, and payroll processes ensuring proper authorization is received, documented, and retained in personnel files. In the four years between FY 2018 and FY 2021, the auditor did not identify any significant findings, evidencing the school’s strong internal accounting controls.