



Lea Crusey
Board Chair

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

July 22, 2024

Via Electronic Mail

Naomi DeVeaux
Board Chair

Daniela Anello
Head of School

DC Bilingual Public Charter School
33 Riggs Road NE
Washington, DC 20011

Re: 20-Year Charter Review of DC Bilingual Public Charter School

Dear Ms. DeVeaux and Ms. Anello:

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 2023 – 24 school year, DC PCSB conducted such a review of DC Bilingual Public Charter School. 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 March 28, 2024, 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).



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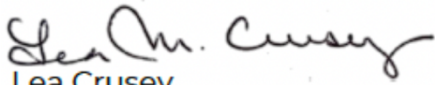
At its public board meeting on April 22, 2024, the DC PCSB Board voted to continue the school's charter for the reasons outlined in the review report and accompanying proposal, incorporating and adopting the staff's findings and recommendations.

Representatives from the school attended 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,


Lea Crusey
Board Chair


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

Cc: School Leaders

DISTRICT OF COLUMBIA PUBLIC CHARTER SCHOOL BOARD

Charter Actions Requiring a Vote

- ☐ Approve a Charter Application
- ☐ Approve a Charter Renewal
- ☒ 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: **Andrys Rojas-Suarez, Senior Specialist, School Performance Department**

SUBJECT: **Charter Review: DC Bilingual Public Charter School**

DATE: **April 22, 2024**

Recommendation

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

Charter Review Findings

DC PCSB staff conducted a 20-year charter review of DC Bilingual 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 charts below summarize DC PCSB staff's findings in these three areas over the review period.

Charter Review Findings	
Review Period	School year (SY) 2018 – 19 through SY 2022 – 23
Charter Goals	DC Bilingual PCS met its goals.
Compliance	DC Bilingual PCS did not violate the law or materially violate its charter.
Finance	DC Bilingual PCS did not commit fiscal mismanagement.

DC Bilingual PCS Goal Attainment						
PMF/Charter Goals Policy Performance						
2018 – 19		2019 – 20	2020 – 21	2021 – 22	2022 – 23	
PMF		Not Applicable			Charter Goals Policy	
84.1%					Met a Pathway	
Mission-Specific Performance						
2018 – 19		2019 – 20	2020 – 21	2021 – 22	2022 – 23	
Rate	Target	Not Applicable			Rate	Target
33.3	12.6				44.7	11.2
n=39					n=47	

DC Bilingual PCS adopted the Performance Management Framework (PMF) as its charter goals in accordance with DC PCSB's *Elect to Adopt the PMF as Charter Goals Policy (PMF as Goals Policy)*.³ In doing so, DC Bilingual PCS committed to earning an average PMF score for school years 2018 – 19, 2019 – 20, 2020 – 21, 2021 – 22, and 2022 – 23 equal to or exceeding 50.0%. In addition to adopting the PMF as its charter goals, DC Bilingual PCS also adopted one mission-specific goal, measuring students' proficiency in science. However, given the disruption in schooling and data collection during the COVID-19 pandemic and DC PCSB's PMF revision efforts,^{4,5} DC PCSB only published PMF outcomes for SY 2018 – 19. Further, per DC PCSB's *COVID-19 Impact Policy*, DC PCSB did not assess goal attainment for school years 2019 – 20, 2020 – 21, or 2021 – 22. Consequently, for this review period, DC PCSB staff assessed DC Bilingual PCS's charter goals performance using 1) SY 2018 – 19 PMF outcomes

³ See the *PMF as Goals Policy* here: <https://bit.ly/2PTj7fL>.

⁴ Per DC PCSB's *COVID-19 Impact Policy*, DC PCSB ceased collection, aggregation, and publication of SY 2019 – 20 academic data and did not produce the SY 2019 – 20 PMF. See the *COVID-19 Impact Policy* here:

⁵ In September 2021, DC PCSB announced its plan to revise its accountability system. Consequently, DC PCSB did not produce the PMF for SY 2021 – 22 or SY 2022 – 23.

and 2) SY 2022 – 23 goal attainment pathway performance as outlined in DC PCSB's *Charter Goals Policy*.⁶ DC PCSB also assessed whether DC Bilingual PCS attained its mission-specific goal targets in SY 2018 – 19 and SY 2022 – 23.

The *Charter Goals Policy* offers multiple pathways to demonstrate SY 2022 – 23 goal attainment, including performance on: transitional goals,⁷ a nationally normed growth assessment, or the Office of the State Superintendent of Education's School Transparency and Reporting (STAR) Framework (OSSE accountability system).⁸ Per the policy, a campus need only satisfy one pathway to meet its SY 2022 – 23 goals.

DC Bilingual PCS met its PMF goal by exceeding the PMF target of 50.0% in SY 2018 – 19. The school met a *Charter Goals Policy* pathway by exceeding the state average for all seven transitional goals measures in SY 2022 – 23. The school met its mission-specific goal by exceeding the goal target in SY 2018 – 19 and SY 2022 – 23.

On its transitional goals measures, DC Bilingual PCS demonstrated strong performance on PARCC Proficiency: Math and PARCC Proficiency: ELA by exceeding the state average by more than 20.0%. The school also exceeded the state average in all other transitional goals measures including CLASS: Classroom Organization, CLASS: Emotional Support, CLASS: Instructional Support, In-Seat Attendance and Re-enrollment.

DC PCSB staff also evaluated the school's compliance with applicable federal and local laws, compliance with its charter, and fiscal management. DC PCSB staff 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.

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.

⁶ See the *Charter Goals Policy* here: <https://bit.ly/44xu4HI>.

⁷ "Transitional goals" refers to standard measures that DC PCSB historically collected from schools such as English language arts and math proficiency, re-enrollment, and in-seat attendance. In school years 2021 – 22 and 2022 – 23, DC PCSB collected transitional goals data from all schools to support evaluation during the COVID-19 recovery period.

⁸ The *Charter Goals Policy* references OSSE's "STAR Framework" for the final goal attainment pathway, which is the former name of OSSE's accountability system. Beginning in 2022, applicable schools will still receive a summative score but will no longer receive STAR ratings. The remainder of this report refers to this system as the "OSSE accountability system."

Based on these findings, DC PCSB staff recommends the Board vote to continue the school's charter.

Additional Academic Data

Separate and apart from the school's goal attainment, DC PCSB staff conducted a Qualitative Site Review (QSR) at DC Bilingual PCS during SY 2022 – 23. DC PCSB uses the QSR to evaluate schools across two domains—classroom environment and instruction, as defined in the Charlotte Danielson *Framework for Teaching*.⁹ DC Bilingual PCS scored significantly above average in both domains compared to relevant public charter schools that recently received a QSR.

Charter Review Standard

The SRA stipulates that DC PCSB “shall review [a school's] charter at least once every [five] years.”¹⁰ 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.¹¹

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.¹²

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.¹³

⁹ Danielson, Charlotte. *The Framework for Teaching: Evaluation Instrument*. Princeton, NJ: Danielson Group, 2013.

¹⁰ D.C. Code § 38-1802.12(a)(3).

¹¹ D.C. Code § 38-1802.13(a).

¹² DC PCSB may impose conditions of continuance if it deems such conditions appropriate.

¹³ D.C. Code § 38-1802.13(b).

Background

DC Bilingual PCS began operation in 2004 under authorization from DC PCSB. The school educates 579 students in grades pre-kindergarten 3 – 5. The school operates one campus located in Ward 5.¹⁴ DC Bilingual PCS's mission is:

to create a learning community that ensures high academic achievement for all students in both Spanish and English, develops leadership, and values all cultures.

Notification

On February 29, 2024, DC PCSB staff notified Advisory Neighborhood Commissioners Emily Singer Lucio (5A03), and Gordon-Andrew Fletcher (5A08) of the school's 20-year charter review.¹⁵ DC PCSB staff also posted a notice for public comment on the charter review in the DC Register and on the DC PCSB website.¹⁶

Attachment to this Proposal

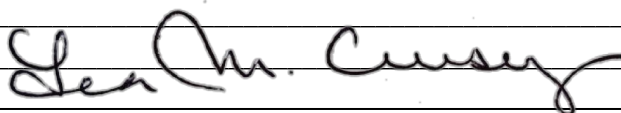
Attachment A: DC Bilingual PCS 20-Year Preliminary Charter Review Report

Date: April 22, 2024

DC PCSB Action: ☒ Approved ☐ Approved with Changes ☐ Rejected

Changes to the Original Proposal:

Board Chair Signature:



¹⁴ This enrollment figure is based on preliminary, unvalidated data as of April 1, 2024.

¹⁵ Seat 5A07 of the Advisory Neighborhood Commissioners is currently vacant.

¹⁶ See the notice here: <https://bit.ly/4ae2ltR>.



2023 – 24 20-Year Charter Review Report DC Bilingual Public Charter School

April 22, 2024

DC Public Charter School Board
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Washington, DC 20003
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BOARD VOTE AND KEY FINDINGS¹

DC Bilingual Public Charter School (PCS)^{2,3}	
Review or Renewal	20-year charter review
Review Period	School year (SY) 2018 – 19 through SY 2022 – 23
Charter Goals	DC Bilingual PCS met its charter goals.
Compliance	DC Bilingual PCS did not violate the law or materially violate its charter.
Finance	DC Bilingual PCS did not commit fiscal mismanagement.
Board Vote	The Board voted 6 – 0 to continue DC Bilingual PCS's charter.

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.”⁴ As such, DC PCSB conducted a 20-year charter review of DC Bilingual PCS, evaluating the school’s progress toward meeting its goals and academic achievement expectations (charter goals). DC PCSB also evaluated the school’s compliance with applicable federal and local laws, compliance with its charter, and fiscal management.

Charter Goals

DC Bilingual PCS adopted the Performance Management Framework (PMF) as its charter goals in accordance with DC PCSB’s *Elect to Adopt the PMF as Charter Goals Policy (PMF as Goals Policy)*.⁵ In doing so, DC Bilingual PCS committed to earning an average PMF score for school years 2018 – 19, 2019 – 20, 2020 – 21, 2021 – 22, and 2022 – 23 equal to or exceeding 50.0%. In addition to adopting the PMF as its charter goals, DC Bilingual PCS also adopted one mission-specific goal, measuring students’ proficiency in science. However, given the disruption in schooling and data collection during the COVID-19 pandemic and DC PCSB’s PMF revision efforts,^{6,7} DC PCSB only published PMF outcomes for SY 2018 – 19. Further, per DC PCSB’s *COVID-19 Impact Policy*, DC PCSB did not assess goal attainment for school years 2019 – 20, 2020 – 21, or 2021 – 22. Consequently, for this review period, DC PCSB assessed DC Bilingual PCS’s charter goal performance using 1) SY 2018 – 19 PMF and mission-specific goal outcomes and 2) SY 2022 – 23 goal attainment

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/43zvIcU>.

³ See DC Bilingual PCS’s Charter Agreement and Amendments, Appendices A1 – A4.

⁴ D.C. Code § 38-1802.12(a)(3).

⁵ See the *PMF as Goals Policy* here: <https://bit.ly/2PTj7fL>.

⁶ Per DC PCSB’s *COVID-19 Impact Policy*, DC PCSB ceased collection, aggregation, and publication of SY 2019 – 20 academic data and did not produce the SY 2019 – 20 PMF. See the *COVID-19 Impact Policy* here: <https://bit.ly/3fy5zDo>.

⁷ In September 2021, DC PCSB announced its plan to revise its accountability system. Consequently, DC PCSB did not produce the PMF for SY 2021 – 22 or SY 2022 – 23.

pathway performance as outlined in DC PCSB’s *Charter Goals Policy* and mission-specific goal outcomes.⁸

The *Charter Goals Policy* offers multiple pathways to demonstrate SY 2022 – 23 goal attainment, including performance on: transitional goals,⁹ a nationally normed growth assessment, or the Office of the State Superintendent of Education’s School Transparency and Reporting (STAR) Framework (OSSE accountability system).¹⁰ Per the policy, a school need only satisfy one pathway to meet its SY 2022 – 23 goals.

DC Bilingual PCS’s goal attainment results are as follows:

DC Bilingual PCS Goal Attainment						
PMF/ <i>Charter Goals Policy</i> Performance						
2018 – 19		2019 – 20	2020 – 21	2021 – 22	2022 – 23	
PMF		NA			<i>Charter Goals Policy</i>	
84.1%					Met a Pathway	
Mission-Specific Performance						
2018 – 19		2019 – 20	2020 – 21	2021 – 22	2022 – 23	
Rate	Target	NA			Rate	Target
33.3	12.6				44.7	11.2
n=39					n=47	

DC Bilingual PCS met its PMF/*Charter Goals Policy* goal by exceeding the PMF target of 50.0% in SY 2018 – 19 and exceeding the state average for all seven transitional goals measures in SY 2022 – 23.¹¹ The school met its mission-specific goal by exceeding the goal target in SY 2018 – 19 and SY 2022 – 23.¹²

Academic Performance Snapshot

DC Bilingual PCS demonstrated strong performance in pre-kindergarten (PK) emotional support, PK instructional support, English language arts (ELA) and math proficiency, and

⁸ See the *Charter Goals Policy* here: <https://bit.ly/44xu4HI>.

⁹ “Transitional goals” refers to standard measures that DC PCSB historically collected from schools such as English language arts and math proficiency, re-enrollment, and in-seat attendance. In school years 2021 – 22 and 2022 – 23, DC PCSB collected transitional goals data from all schools to support evaluation during the COVID-19 recovery period.

¹⁰ The *Charter Goals Policy* references OSSE’s “STAR Framework” for the final goal attainment pathway, which is the former name of OSSE’s accountability system. Beginning in 2022, applicable schools will still receive a summative score but will no longer receive STAR ratings. The remainder of this report refers to this system as the “OSSE accountability system.”

¹¹ See data on page 17.

¹² For SY 2022 – 23, DC PCSB applies Pathway A of the *Charter Goals Policy* to mission-specific goals. Pathway A allows schools to meet individually-negotiated charter goals by meeting or exceeding the goal target or by improving from SY 2021 – 22 to SY 2022 – 23. DC PCSB could not evaluate improvement from the prior school year on DC Bilingual PCS’s mission-specific goal because SY 2021 – 22 data is not available.

re-enrollment. In each of these measures, the school exceeded the state average and improved from SY 2021 – 22 to SY 2022 – 23. DC Bilingual PCS demonstrated particularly strong performance in ELA and math proficiency, exceeding both state averages by more than 23 percentage points. Separate and apart from the school's goal attainment, results from DC Bilingual PCS's most recent Qualitative Site Review (QSR) in SY 2022 – 23 suggest strong performance in both the classroom environment and instruction domains.¹³ The school had significantly higher percentages of core content classrooms rated proficient or distinguished in both domains compared to comparable public charter classrooms that underwent a QSR in SY 2022 – 23.

Compliance and Finance

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.

Board Vote

At its public meeting on April 22, 2024, the DC PCSB Board voted 6 – 0 to continue DC Bilingual PCS's charter.

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

¹³ See the QSR section on pages 9 – 10 of this report for further details about the school's QSR performance.

SCHOOL BACKGROUND

DC Bilingual PCS			
Year Opened	2004 – 05	Ward(s)	5
Number of Campuses	1	Year(s) of Previous Review	2009 – 10, 2013 – 14, and 2018 – 19
Chartered Grade Span	Pre-kindergarten 3 (PK3) – 5	Current Enrollment Ceiling	598
Current Enrollment and Grade Span¹⁴			
DC Bilingual PCS			
572, PK3 – 5			
Mission Statement			
The mission of DC Bilingual Public Charter School is to create a learning community that ensures high academic achievement for all students in both Spanish and English, develops leadership, and values all cultures.			

School Overview

DC Bilingual PCS began operation in 2004 under authorization from DC PCSB, initially serving students in PK3 – kindergarten (K). The local education agency (LEA)¹⁵ expanded over time, adding first grade in 2005, second and third grade in 2006, fourth grade in 2007, and fifth grade in 2008. In 2020, due to the school’s growing student body, DC Bilingual PCS applied and was approved for an enrollment ceiling increase. DC Bilingual PCS’s enrollment ceiling will increase each year, ultimately reaching capacity with 712 students in SY 2028 – 29.

DC Bilingual PCS offers students a two-way immersion model of bilingual learning. Two-way immersion is a form of dual language instruction that brings together students from two native language groups for language, literacy, and academic content instruction through two languages. At DC Bilingual PCS, students in PK3 and pre-kindergarten 4 (PK4) classrooms have access to two teachers in each classroom.¹⁶ One teacher is an English-dominant teacher, while the other is a Spanish-dominant teacher. From grades K – 5, student schedules reflect a 50/50 dual language model. This means each student spends half of their day learning and interacting in Spanish and the other half learning and interacting in English.

¹⁴ This enrollment figure is based on preliminary, unvalidated data as of March 27, 2024.

¹⁵ An “LEA” is any individual or group of public charter schools operating under a single charter.

¹⁶ For further details, see DC Bilingual PCS’s annual report for SY 2022 – 23, Appendix B.

In 2014, DC Bilingual PCS entered a consortium with four other bilingual public charter schools to jointly operate the District of Columbia International School (DCI).¹⁷ DCI is a middle and high school program where consortium students have an enrollment preference. As such, DC Bilingual PCS's rising sixth graders receive a transfer preference through the My School DC lottery to enroll at DCI. When DC Bilingual PCS students matriculate from fifth grade and enroll in DCI, those students are no longer deemed enrolled at DC Bilingual PCS.¹⁸ Thus, this charter review only reflects an analysis of DC Bilingual PCS's early childhood and elementary program.

Enrollment and Demographic Data

DC Bilingual PCS enrolls students from Wards 1, 3, 4, 5, 6, 7, and 8. In SY 2022 – 23, nearly half of all DC Bilingual PCS students lived in Ward 4, and an additional quarter lived in Ward 5. Most of the school's remaining students lived in Wards 1, 6, and 7.¹⁹ The tables below show the LEA's enrollment history.

School Year	2018 – 19	2019 – 20	2020 – 21	2021 – 22	2022 – 23
Audited Enrollment ²⁰	444	453	478	490	529
Enrollment Projections ²¹	443	442	448	472	516
Enrollment Ceiling ²²	500	500	500	500	530

School Year	2018 – 19	2019 – 20	2020 – 21	2021 – 22	2022 – 23
DC Bilingual PCS					
PK3	37	38	40	45	71
PK4	40	43	60	70	82
K	72	48	73	72	72
1	51	72	48	71	72
2	73	51	72	48	70
3	67	73	50	69	47
4	62	68	73	47	68
5	42	60	62	68	47

¹⁷ D.C. Code § 38-1802.01(c-1).

¹⁸ DC Bilingual PCS has assigned all rights and responsibilities with respect to its middle and high school program to DCI.

¹⁹ OSSE provides LEA audited enrollment data by student home ward to DC PCSB. If the student's address information was not submitted or submitted incorrectly, that data will not be reflected in these totals. As a result, there may be discrepancies in the data reported in each LEA's official audited enrollment totals here: <https://bit.ly/49Nec7o>.

²⁰ OSSE conducts an annual enrollment audit to determine the number of students at each public school in the District.

²¹ 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.

²² Each charter LEA has an enrollment ceiling in its charter agreement, designating the maximum number of students for which the school can receive per pupil funding during each school year.

The chart below shows the school's student demographics in SY 2022 – 23.

Student Group	Percentage Enrolled
At-Risk Students ²³	23.3%
Emerging Multilingual Learners (EML) ²⁴	30.8%
Students with Disabilities (SWD) ²⁵	13.8%
American Indian or Alaska Native	0.0%
Asian	0.6%
Black or African American	18.1%
Hispanic/Latino	45.6%
Multiracial	3.6%
Native Hawaiian or Other Pacific Islander	0.0%
White	32.1%

School Climate²⁶

The charts below report DC Bilingual 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 for SY 2022 – 23. DC PCSB presents these measures by grade band and student group and compares them to the relevant average rates for the DC public charter sector. These data do not factor into DC PCSB's continuance decision. Still, isolating school environment measures by student groups helps to identify whether there may be access and opportunity disparities. For a full report on DC Bilingual PCS's school environment measures across the review period, please see Appendix C.

OSS

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.

²³ 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.

²⁴ EML students are students whose native language is a language other than English. An EML student may have difficulty speaking, reading, writing, or understanding the English language.

²⁵ SWD are students identified as having an Individualized Education Program (IEP) that details the special education services the students must receive. For demographic data, DC PCSB counts any student who was identified as SWD through the year in the final calculation.

²⁶ On April 19, 2024, the tables on pages 8 – 9 of this report and in Appendix C were updated to reflect accurate sector and school rates.

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 ²⁷

SY 2022 – 23 Average OSS Rates					
School/Sector	Grade Band	All Students	At-Risk Students	EML	SWD
DC Bilingual PCS	PK3 – PK4	0.0%	0.0%	0.0%	0.0%
Sector		0.0%	0.0%	0.0%	0.0%
DC Bilingual PCS	K – 5	0.5%	1.4%	0.8%	1.9%
Sector		3.2%	4.6%	1.0%	5.4%

MYW

The MYW rate is the percentage of students who have withdrawn from school during the school year.

SY 2022 – 23 Average MYW Rates					
School/Sector	Grade Band	All Students	At-Risk Students	EML	SWD
DC Bilingual PCS	PK3 – PK4	0.0%	0.0%	0.0%	0.0%
Sector		3.1%	3.8%	2.4%	2.4%
DC Bilingual PCS	K – 5	0.8%	2.9%	0.0%	1.9%
Sector		3.8%	4.9%	2.2%	4.1%

ISA

The ISA rate is the percentage of students who were present each day.

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

²⁷ DC PCSB does not report values when the n-size is less than 10.

SY 2022 – 23 Average ISA Rates					
School/Sector	Grade Band	All Students	At-Risk Students	EML	SWD
DC Bilingual PCS	PK3 – PK4	87.6%	79.0%	83.8%	82.6%
Sector		84.7%	81.0%	86.5%	84.0%
DC Bilingual PCS	K – 5	92.5%	89.4%	90.9%	91.8%
Sector		88.8%	85.9%	92.6%	87.5%

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*.²⁸ From October 17 – 28, 2022, in anticipation of this review, DC PCSB staff conducted a QSR at DC Bilingual PCS.²⁹

In the classroom environment domain, across observations, observers noted student behavior was almost entirely appropriate, and any instances of student misbehavior were minor. Further, when needed, teachers respectfully and successfully responded to misbehavior. In most classrooms, students quickly complied once redirected.

In the instruction domain, across classrooms, observers noted teachers' content explanations were clear and invited student participation and thinking. In some classrooms, teachers asked students to explain content to their classmates, and students did so accurately. In most classrooms, teachers clearly stated what students would be learning.

After conducting unannounced observations,³⁰ the QSR team rated the classroom environment and instruction as “unsatisfactory,” “basic,” “proficient,” or “distinguished.” The following chart details the percentage of DC Bilingual 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.

Key for One-Year QSR Average	
Green	Equal to or more than the one-year QSR average
Red	Less than the one-year QSR average

²⁸ Danielson, Charlotte. *The Framework for Teaching: Evaluation Instrument*. Princeton, NJ: Danielson Group, 2013.

²⁹ See DC Bilingual PCS's QSR Report, Appendix D.

³⁰ During SY 2022 – 23 QSR visits, the QSR team observed 75.0% of a campus's core content classrooms. DC PCSB defines core content classrooms as ELA, Math, Science, and Social Studies. The QSR team also observed electives when the coursework was an essential part of the school's mission.

School/Sector	Classroom Environment	Instruction
Percentage of Classrooms Rated Proficient or Distinguished		
DC Bilingual PCS	94.2%	86.3%
Average score for PK – 8 public charter schools	79.0%	68.8%

DC Bilingual PCS scored above the average in both domains compared to other PK – 8 public charter schools that received a QSR during SY 2022 – 23.

In addition to conducting classroom observations, DC PCSB staff and The New Teacher Project (TNTP) consultants reviewed sample English language arts (ELA) and math assignments DC Bilingual 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.^{31, 32}

Of the five ELA samples DC Bilingual PCS submitted, three assignments received an overall rating of “sufficient.” These assignments were based on a high quality, grade-appropriate text. They required students to use what they learned in the text and allowed students to use their personal voice. Two assignments received an overall rating of “minimal.” These assignments were also based on a high quality, grade-appropriate text, but the accompanying questions did not reach the full depth of the standard or students did not have an opportunity to use their personal voice. No assignments received an overall rating of “unsatisfactory.”

Of the five math samples DC Bilingual PCS submitted, three assignments received an overall rating of “sufficient.” These assignments reached the full depth of the targeted standards and mathematical practice while also allowing students to relate academic content to the real world. Two assignments received an overall rating of “minimal.” These assignments were aligned to grade-level standards, but all questions did not reach the full depth of the targeted standards. Further, these assignments did not relate academic content to the real world. No assignments received an overall rating of “unsatisfactory.”

³¹ See the protocol here: <https://bit.ly/3TiVZbS>.

³² 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.”

Previous Charter Reviews

Five-Year Review

In SY 2009 – 10, DC PCSB conducted a five-year review of DC Bilingual PCS and found the school met the standard for charter continuance.³³ In this review, DC PCSB found DC Bilingual PCS met two of its three academic standards. The school also met two of its three PK academic targets. DC PCSB noted that in SY 2009 – 10, “the school made substantial programmatic improvement and subsequent academic performance gains.” Based on these findings, in January 2010, DC PCSB voted to continue DC Bilingual PCS’s charter.

10-Year Review

In SY 2013 – 14, DC PCSB conducted a 10-year review of DC Bilingual PCS and found the school met the standard for charter continuance.³⁴ DC PCSB found that the school fully met its elementary program goals and academic achievement expectations but had mixed results regarding its performance in early childhood. The report also noted that DC Bilingual PCS had repeatedly violated the SRA’s requirements related to procurement contracts and that the school had been identified as a fiscally low performing school for the three years prior to its 10-year review. Based on these findings, in June 2014, DC PCSB voted to continue DC Bilingual PCS’s charter with the following conditions: the school must fully comply with the SRA’s requirements regarding procurement contracts (to be assessed in its 15-year renewal); the school must develop with DC PCSB staff a milestone-based plan to strengthen its financials and segregate them with CentroNia; and finally, that DC PCSB have access to review the school’s financial position.

15-Year Renewal

In SY 2018 – 19, DC PCSB conducted a 15-year renewal of DC Bilingual PCS and found the school met the standard for renewal.³⁵ Ahead of its 15-year renewal, DC Bilingual adopted the PMF as its goals. In doing so, DC Bilingual PCS agreed to achieve an average PMF score equal to or exceeding 55.0% of the possible PMF points in two of the most recent four years and earn at least 45.0% in four of the previous five years, except SY 2014 – 15 when it was held harmless. DC Bilingual PCS earned over 55.0% in all four years that it received a PMF score during the review period. Additionally, the school agreed to one mission-specific goal regarding meeting or exceeding the state average for proficiency on the state science assessment. The school’s mission-specific goal could not be assessed because it was based on the DC State Science Assessment, an exam that was not administered in the District during this review period. DC PCSB determined the LEA met its goals. Based on these findings, in January 2019, DC PCSB voted to renew DC Bilingual PCS’s charter for another 15-year term.

³³ See DC Bilingual PCS’s Five-Year Review Report, Appendix E.

³⁴ See DC Bilingual PCS’s 10-Year Review Report, Appendix F.

³⁵ See DC Bilingual PCS’s 15-Year Renewal Report, Appendix G.

Communication with the School

In February 2024, DC PCSB staff met with DC Bilingual PCS staff to discuss the school's 20-year review. DC PCSB staff provided the school with a chart showing the school's charter goals performance during the review period and an explanation of how DC PCSB assesses goal attainment for SY 2022 – 23 per the *Charter Goals Policy*.

CHARTER REVIEW STANDARD

The SRA stipulates that DC PCSB “shall review [a school's] charter at least once every [five] years.”³⁶ 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.³⁷

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.³⁸

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.³⁹

³⁶ D.C. Code § 38-1802.12(a)(3).

³⁷ D.C. Code § 38-1802.13(a).

³⁸ DC PCSB may impose conditions of continuance if it deems such conditions appropriate.

³⁹ 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.

In June 2020,⁴⁰ DC Bilingual PCS amended its charter agreement to adopt an updated version of the PMF as its charter goals and one mission-specific goal.⁴¹ In doing so, DC Bilingual PCS agreed to the following review standard:

The [s]chool... will be deemed to have met its goals and academic achievement expectations if... at its [20]-year charter review, [it] obtains an average PMF score for school years 2018 – 19, 2019 – 20, 2020 – 21, 2021 – 22, and 2022 – 23 equal to or exceeding 50%. Additionally, the [s]chool... has met its mission-specific goal...by achieving the specified target.

As previously noted, given the disruption in schooling and data collection during the COVID-19 pandemic and DC PCSB's PMF revision efforts, DC PCSB only published PMF scores for SY 2018 – 19. Further, per the *COVID-19 Impact Policy*, DC PCSB did not assess goal attainment for school years 2019 – 20, 2020 – 21, or 2021 – 22. For SY 2022 – 23, DC PCSB resumed goal attainment assessment using pathways established in its *Charter Goals Policy*.⁴² Consequently, for this review period, DC PCSB evaluated DC Bilingual PCS's progress meeting its charter goals using 1) SY 2018 – 19 PMF and mission-specific goal outcomes and 2) SY 2022 – 23 goal attainment pathway performance as outlined in DC PCSB's *Charter Goals Policy* and mission-specific goal outcomes.

DC Bilingual PCS's goal attainment results are as follows:

DC Bilingual PCS Goal Attainment						
PMF/Charter Goals Policy Performance						
2018 – 19		2019 – 20	2020 – 21	2021 – 22	2022 – 23	
PMF		NA			Charter Goals Policy	
84.1%					Met a Pathway	
Mission-Specific Performance						
2018 – 19		2019 – 20	2020 – 21	2021 – 22	2022 – 23	
Rate	Target	NA			Rate	Target
33.3	12.6				44.7	11.2
n=39					n=47	
Determination: DC Bilingual PCS <u>met</u> its PMF/Charter Goals Policy goal by exceeding the PMF target of 50.0% in SY 2018 – 19 and meeting a goal						

⁴⁰ See DC Bilingual PCS's Goals Charter Amendment, Appendix A2.

⁴¹ For details, see the 2019 – 20 PMF Policy & Technical Guide here: <https://bit.ly/2D2lvgc>.

⁴² See the Charter Goals Policy here: <https://bit.ly/44xu4Hl>.

DC Bilingual PCS Goal Attainment

attainment pathway per the *Charter Goals Policy* in SY 2022 – 23. DC Bilingual PCS met its mission-specific goal by exceeding the goal target in SY 2018 – 19 and SY 2022 – 23.

The remainder of Section One contains:

1. A description of the PMF and DC Bilingual PCS's SY 2018 – 19 PMF outcomes;
2. A description of the goal attainment pathways in the *Charter Goals Policy* and data pertaining to the school's pathway performance in SY 2022 – 23;
3. DC Bilingual PCS's mission-specific goal outcomes for SY 2018 – 19 and SY 2022 – 23; and
4. Additional data on EML students' English proficiency at DC Bilingual PCS.

The appendices to this report include a full summary of DC Bilingual PCS's academic performance during this review period.⁴³

PMF Overview and DC Bilingual PCS's SY 2018 – 19 PMF Outcomes

DC PCSB evaluated DC Bilingual PCS—and similar schools—under its Early Childhood, Elementary School, and Middle School PMF (PK – 8 PMF). Using a 100-point scale, the PK – 8 PMF identified schools as high-performing, mid-performing, or low-performing based on their overall performance in four categories. In SY 2018 – 19, DC Bilingual PCS earned a score of 84.1% on the PMF (the equivalent of a “high-performing” rating). In doing so, the school exceeded its PMF target of 50.0%.

Charter Goals Policy Pathway Overview and DC Bilingual PCS's SY 2022 – 23 Pathway Performance⁴⁴

The *Charter Goals Policy* established four pathways for schools to demonstrate goal attainment in SY 2022 – 23. Per the policy, DC PCSB evaluates a school's SY 2022 – 23 goal attainment using the pathways in the order in which they appear.⁴⁵ For schools that adopted the PMF and mission-specific charter goals, including DC Bilingual PCS, DC PCSB evaluates performance using a combination of Pathway A and Pathways B – D. Specifically, DC PCSB uses Pathway A to determine whether the school met its mission-specific charter goals. Then, DC PCSB uses Pathways B – D to determine whether the school met academic

⁴³ See DC Bilingual PCS's SY 2018 – 19 PMF in Appendix H. See a complete summary of DC Bilingual PCS's SY 2022 – 23 academic performance data in Appendix I.

⁴⁴ Per the *Charter Goals Policy*, DC PCSB did not make determinations in SY 2019 – 20, SY 2020 – 21, or SY 2021 – 22 due to the COVID-19 pandemic.

⁴⁵ DC PCSB first examined whether a campus either met/exceeded the state average or demonstrated improvement from SY 2021 – 22 on each transitional goals measure (Pathway B). If not, DC PCSB examined whether the campus's nationally normed growth assessment met/exceeded publisher growth criteria or demonstrated improvement from SY 2021 – 22 (Pathway C). If not, DC PCSB compared the campus's score on the OSSE accountability system to the 40.0% target (Pathway D). For details, see pages 2 – 3 of the *Charter Goals Policy* here: <https://bit.ly/44xu4Hl>.

measures that were included in the PMF (including ELA and math proficiency and/or growth).

The following table summarizes the pathways applicable to DC Bilingual PCS.

SY 2022 – 23 Goal Attainment Pathways	
Pathway	How to Meet the Pathway
A: Individually Negotiated Goals	For schools with individually negotiated goals: Meet or exceed the goal targets as set in the charter agreement <u>OR</u> demonstrate improvement compared to SY 2021 – 22 performance on the goal targets as set in the charter agreement.
B: Transitional Goals	For each applicable transitional goals data measure (excluding nationally normed growth assessments): Meet or exceed the state average (sector average when state is unavailable) <u>OR</u> demonstrate improvement compared to SY 2021 – 22 baseline data.
C: Growth	For school-selected, nationally normed growth assessment: Meet or exceed publisher growth criteria on both ELA/reading and math subject tests compared to the publisher national performance rates <u>OR</u> demonstrate improvement compared to SY 2021 – 22 baseline data.
D: OSSE Accountability System	Earn a 40.0% or higher on OSSE's accountability system for SY 2022 – 23.

In SY 2022 – 23, DC Bilingual PCS met Pathway B by exceeding the state average in all seven transitional goals measures. See below for details about DC Bilingual PCS's performance on Pathway B.⁴⁶

Charter Goals Policy Pathway B – Transitional Goals

For schools serving PK – 5 students, transitional goals measures include, to the extent available: PK Classroom Assessment Scoring System (CLASS) outcomes; proficiency on the Partnership for Assessment of Readiness for College and Careers (PARCC) assessment in ELA and math, indicated by the percentage of students scoring 4 or higher;⁴⁷ ISA; and re-enrollment. The chart below shows the school's overall performance on each applicable transitional goals measure, and whether the rate met the comparative target. The chart indicates DC Bilingual PCS exceeded the state average in all seven measures.

⁴⁶ See the next section on page 17 for information about DC Bilingual PCS's Pathway A performance, which pertains to its mission-specific goal.

⁴⁷ A score of "4" or "5" on PARCC indicates that students have met or exceeded expectations for their grade level.

Meet or Exceed State/Sector Average (Pathway B)			
Measure	SY 2021 – 22 Comparative Average ⁴⁸	SY 2022 – 23 School Performance	
	State ⁴⁹	n-size	Rate
CLASS: Classroom Organization	6.0	NA	6.3
CLASS: Emotional Support	6.1	NA	6.3
CLASS: Instructional Support	3.0	NA	3.4
PARCC Proficiency: ELA	30.1	161	54.0
PARCC Proficiency: Math	21.5	161	46.0
In-Seat Attendance	87.9	NA	91.1
Re-enrollment	84.2	411	96.1

DC Bilingual PCS's Mission-Specific Goal Outcomes for SY 2018 – 19 and SY 2022 – 23

Per DC Bilingual PCS's Renewal Agreement,⁵⁰ DC PCSB evaluated the mission-specific goal below. For SY 2018 – 19, DC PCSB assessed whether the school met or exceeded the goal target. For SY 2022 – 23, DC PCSB applied Pathway A from the *Charter Goals Policy*, which allows schools to meet individually-negotiated charter goals by meeting or exceeding the goal target or by improving from SY 2021 – 22 to SY 2022 – 23.⁵¹

Mission-specific goal: The percent of students scoring proficient or advanced will meet or exceed the state average on the state science assessment.

Mission-Specific Goal Outcomes						
2018 – 19		2019 – 20	2020 – 21	2021 – 22	2022 – 23	
Rate	Target	NA			Rate	Target
33.3	12.6				44.7	11.2
n=39					n=47	

DC Bilingual PCS met its mission-specific goal by exceeding the goal target in SY 2018 – 19 and in SY 2022 – 23.

Additional Data – Emerging Multilingual Learner (EML) Proficiency⁵²

ACCESS for English Language Learners 2.0 (ACCESS) is DC's annual English language proficiency assessment for grades K – 12. The test measures the English language

⁴⁸ Per the *Charter Goals Policy*, SY 2022 – 23 outcomes are compared to SY 2021 – 21 state and sector data.

⁴⁹ State/sector averages for elementary and/or middle schools are based on PK – 8 inclusive data, excluding outliers. Averages are not grade-band specific.

⁵⁰ See DC Bilingual PCS's Renewal Agreement, Appendix A1.

⁵¹ DC PCSB could not evaluate improvement from SY 2021 – 22 to SY 2022 – 23 because SY 2021 – 22 data is not available for the percentage of DC Bilingual PCS students scoring proficient or advanced on the state science assessment.

⁵² ACCESS data does not factor into DC Bilingual PCS's goal determination.

development of EML students across four domains: listening, reading, speaking, and writing. EML students must test every year until they score a 4.5 or higher,⁵³ indicating proficiency. Each year, OSSE calculates the percentage of EML students making progress in achieving English language proficiency as measured by their performance on the ACCESS test. OSSE reports ACCESS growth for grades K – 5 within its Elementary Framework and grades 6 – 12 within its Secondary Framework. OSSE reports ACCESS growth for schools with 10 or more eligible test-takers.

The following chart shows the percentage of EML students at DC Bilingual PCS who met their ACCESS growth target relative to the sector average.⁵⁴ In SY 2018 – 19 and SY 2022 – 23, the rate of EML students at DC Bilingual PCS who met their growth targets slightly exceeded the sector average rate.

ACCESS Growth Compared to Sector									
Elementary Framework									
2018 – 19		2019 – 20		2020 – 21		2021 – 22		2022 – 23	
Sector	School	Sector	School	Sector	School	Sector	School	Sector	School
34.9	36.8	NA ⁵⁵				NA ⁵⁶		50.5	51.1

Data on the statewide average of EML students who met their ACCESS growth target (as shown above for the school and sector) for SY 2022 – 23 is not available due to a recent change in the way OSSE measures ACCESS growth in its accountability system.⁵⁷ In its 2023 DC Report Card, OSSE reports ACCESS growth using the median “percent of growth target met” among all ACCESS test-takers, instead of the rate of students who met or exceeded their growth target. Each student’s “percent of growth target met” is calculated by dividing the student’s actual change in proficiency level by their expected growth target.⁵⁸ Students whose growth exceeds their target are reported as exceptional growth, or growth over 100 percent. The chart below illustrates the median growth rate for DC

⁵³ In SY 2018 – 19, the score indicating English language proficiency was 5.0 or higher. OSSE updated the score to 4.5 in SY 2021 – 22.

⁵⁴ For more information about how students’ ACCESS growth targets are calculated, please refer to OSSE’s English Language Proficiency Business Rules: <https://bit.ly/3Hub8jW>.

⁵⁵ For SY 2019 – 20 and SY 2020 – 21, ACCESS testing was interrupted due to the COVID-19 pandemic; therefore, data are not available.

⁵⁶ While schools administered ACCESS in SY 2021 – 22, ACCESS growth rates are not available because growth calculations require data from the prior school year.

⁵⁷ See OSSE’s English Language Proficiency Business Rules: <https://bit.ly/3Hub8jW>.

⁵⁸ For more information about how students’ ACCESS growth targets are calculated, please refer to OSSE’s English Language Proficiency Business Rules: <https://bit.ly/3Hub8jW>.

Bilingual PCS compared to the state in SY 2022 – 23. The median rate for DC Bilingual PCS was equal to the state’s median rate during SY 2022 – 23.

SY 2022 – 23 ACCESS Growth Compared to State	
Elementary Framework	
State Median	School Median
100.0	100.0

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.”⁵⁹ The SRA contains a non-exhaustive list of applicable laws, which DC PCSB monitors in its annual compliance reviews. Since SY 2018 – 19, DC Bilingual PCS has been compliant with all applicable laws as captured in DC PCSB's compliance reviews.⁶⁰

DC PCSB also monitors schools' compliance with the procurement requirements in the SRA and with DC PCSB's *Emerging Multilingual Learner Audit and Monitoring Policy*. In addition, DC PCSB supports OSSE, as the state education agency (SEA), in its monitoring of compliance with federal laws pertaining to special education students.

The remainder of this section examines the school's compliance with procurement requirements, DC PCSB's *Emerging Multilingual Learner Audit and Monitoring Policy*, and special education laws over the review period.

Procurement Contract Compliance

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 the 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.⁶¹

During fiscal year (FY) 2019, DC PCSB found DC Bilingual PCS reported nine procurement contract packages but received two Early Warning Notices for failure to report complete procurement contract packages in a timely manner.

During FY 2020, DC Bilingual PCS reported 25 procurement contract packages, but received one Early Warning Notice for failure to report complete contract packages in a timely manner.

⁵⁹ D.C. Code § 38-1802.12(a)(3).

⁶⁰ See DC Bilingual PCS's Compliance Review Reports, Appendices J1 – J5.

⁶¹ In July 2018, DC PCSB began implementing a new *Procurement Contract Submission and Conflict of Interest Policy*, which includes more robust and comprehensive oversight processes around procurement contracts. Schools, in turn, were expected to adjust their internal processes over time to ensure higher levels of compliance with procurement contract reporting requirements.

During FY 2021, DC Bilingual PCS reported 42 procurement contract packages. DC Bilingual PCS did not receive any Early Warning Notices for failure to report complete contract packages in a timely manner.

During FY 2022, DC Bilingual PCS reported 41 procurement contract packages, but it received two Early Warning Notices for failure to report complete contract packages in a timely manner.

Currently, DC PCSB has no concerns about the LEA's compliance with procurement contract submission requirements. DC PCSB will continue to closely monitor the school's compliance to ensure DC Bilingual PCS reports all procurement contracts in adherence with the *Procurement Contract Submission and Conflict of Interest Policy*.

Emerging Multilingual Learner Compliance

DC PCSB Audit and Monitoring Actions

Pursuant to the *Emerging Multilingual Learner Audit and Monitoring Policy*, DC PCSB regularly reviews LEA data and practices to determine whether public charter schools are compliant with local and federal laws pertaining to EML students.⁶²

During the review period, DC PCSB flagged DC Bilingual PCS for an audit for the disproportionate dual identification of EML students being also identified as students with disabilities. Please see the chart below for more information on the audit resolution.

School Year	Audit Criteria	Type of Audit	Results
2018 – 19	Dual ID of SWD and EL	Desk Audit	No action was required; however, DC PCSB recommended the school monitor student progress closely and evaluate its teaching methods.
2019 – 20	Dual ID of SWD and EL	Pre-Audit Warning	No action was required; however, DC PCSB continued to monitor the school's dual identification rate for EML students.
2020 – 21	Dual ID of SWD and EL	Pre-Audit Warning	No action was required; however, DC PCSB continued to monitor the school's dual identification rate for EML students.

Special Education Compliance and Performance⁶³

Charter schools are required to comply with all federal and local special education laws, including the Individuals with Disabilities Education Act (IDEA)⁶⁴ and Section 504 of the

⁶² See the *Emerging Multilingual Learner Audit and Monitoring Policy* here: <https://bit.ly/4c2XP86>.

⁶³ See OSSE's Glossary of Special Education Compliance Terms, Appendix K.

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

Rehabilitation Act of 1973.⁶⁵ As the SEA, OSSE monitors charter schools' special education program performance through an annual review of compliance and student progress measures. In collaboration with OSSE, DC PCSB also monitors indicators of special education compliance and performance through its *Special Education Audit and Monitoring Policy* and other oversight practices.⁶⁶

OSSE Special Education Performance Review Overview

Each year, OSSE analyzes each LEA's compliance with special education requirements and issues its findings in an annual determination report to the LEA. Prior to SY 2021 – 22, OSSE made determinations about special education compliance using eight applicable measures. In spring 2023, OSSE released the Special Education Performance Report (SEPR).⁶⁷ In its SEPR, OSSE assesses performance with an expanded number of measures in two categories: LEA Compliance and Student Progress. OSSE provides SEPR levels annually based on the previous year's performance.

In addition to SEPR levels and scores, OSSE continues to report LEA performance using the "annual determination" language in accordance with U.S. Department of Education reporting requirements. The SEPR scores and levels are aligned with the IDEA Annual Determinations as seen in the table below.⁶⁸

Percentage of Points from Applicable Measures ⁶⁹	LEA Performance Description	IDEA Annual Determination	SEPR Level
81.0% – 100%	LEA demonstrates the highest rates of compliance and quality service delivery to students.	Meets Requirements	Leading
61.0% – 80.9%	LEA shows high rates of compliance and quality service delivery to students.	Needs Assistance	Strengthening
41.0% – 60.9%	LEA is approaching compliance and quality service delivery to students.	Needs Intervention	Building
0.0% – 40.9%	LEA requires supports to improve both compliance and quality service delivery to students.	Needs Substantial Intervention	Emerging

⁶⁵ 29 U.S.C. § 794.

⁶⁶ For more details, in this report, see the school climate information in the School Background section and Appendix C. Also see the supplemental academic data by student group in Appendix I.

⁶⁷ See the SEPR for DC Bilingual PCS for FFY 2021, Appendix L.

⁶⁸ See Appendix M for more details about LEA performance and OSSE's enforcement actions for each IDEA Annual Determination and SEPR score level.

⁶⁹ For a full list of measures, see pages 8 – 11 of OSSE's SEPR technical guide here: bit.ly/49Z5Jxt. OSSE evaluates each LEA on the collection of measures that are applicable to the LEA. (For example, the Secondary Transition measure only applies to LEAs that serve students aged 16 and older.)

IDEA Annual Determination Performance and SEPR Analysis

See the table below for DC Bilingual PCS's annual performance scores in this review period. OSSE determined these scores using the percentage of points from the applicable measures for DC Bilingual PCS regarding IDEA compliance and student progress.

FFY ⁷⁰	Percentage of Points from Applicable Measures	Annual Determination	SEPR Level
2018	95.0%	Meets Requirements	NA
2019	97.1%	Meets Requirements	
2020	100.0%	Meets Requirements	
2021	83.8%	Meets Requirements	Leading

SEPR reports on an LEA's capacity to serve students with disabilities. As indicated above, the scores include an expanded number of measures grouped into two performance areas: LEA Compliance and Student Progress. LEA Compliance makes up 35 points of the total score earned. Student Progress makes up 65 points of the total score earned. The overall score is weighted in this way and reported as a percentage of points from the applicable measures.

DC Bilingual PCS's SEPR report for FFY 2021 in Appendix L provides specific information about the school's performance on each measure. See a high-level summary of DC Bilingual PCS's results in the table below.

Performance Area	LEA Percent of Points Earned	Weight	Performance Area Points Earned
LEA Compliance	100%	35	35.0
Student Progress	75.0%	65	48.8
Total (points earned out of 100): 83.8			

OSSE Enforcement Actions

DC Bilingual PCS did not require any OSSE enforcement actions or interventions during the review period.

State and Due Process 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

⁷⁰ FFY, or federal fiscal year, refers to the one-year period that OSSE uses to monitor and report on special education compliance. Each FFY begins July 1 and ends June 30 of the following calendar year. For example, FFY 2018 refers to July 1, 2018 – June 30, 2019.

the IDEA or with the District's laws and regulations regarding special education, including the identification, evaluation, educational placement, or provision of a Free and Appropriate Public Education (FAPE).

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 Hearing Officer Determination (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.

DC Bilingual PCS did not receive state complaints or due process complaints during the review period.

DC PCSB Audit and Monitoring Actions

Per the *Special Education Audit and Monitoring Policy*,⁷¹ DC PCSB regularly reviews LEA data and practices to determine whether public charter schools are compliant with local and federal laws pertaining to students with disabilities.

During the review period, DC PCSB issued a pre-audit warning to DC Bilingual PCS because the school met one of the criteria for examination: "A special education level of need (i.e., Level 1 – 4) comprising 75.0% or more of the total population of students with disabilities."⁷² At the time of issuance, the school enrolled 64 students with individualized education programs (IEPs); 51 of those students had Level 1 IEPs. That represented 79.7% of students. Therefore, the school exceeded the 75.0% threshold for IEPs within a single level of need. Since the pre-audit warning in November 2020, the school has not been flagged for this audit criterion again. DC PCSB staff recommended no corrective action. DC PCSB continues to monitor the school's enrollment trends, options for student support, and interventions to determine whether further intervention is warranted.

⁷¹ See the *Special Education Audit and Monitoring Policy* here: <https://bit.ly/49U9wfR>. This policy was revised in August 2023 to include additional specifications in some audit criteria. The school was cited under DC PCSB's former Special Education Audit Policy. See the former policy here: <https://bit.ly/4aEgYM3>.

⁷² This audit criterion comes from DC PCSB's former *Special Education Audit Policy*, which was in effect at the time of the school's pre-audit warning. The updated policy includes additional specifications in this audit criterion, which specify that, in order to receive an audit action, the school's programming must be "without evidence of a student support and intervention process and inclusive recruitment strategies."

School Year	Audit Criteria	Type of Audit	Results
2021 – 22	Special Education levels	Pre-Audit Warning	No action was required; however, DC PCSB continues to routinely monitor the number of students at each special education level through SLED, SEDS, and the school's student information system (SIS).

SECTION THREE: FISCAL MANAGEMENT AND ECONOMIC VIABILITY⁷³

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

- has engaged in a pattern of nonadherence to generally accepted accounting principles (GAAP);
- has engaged in a pattern of fiscal mismanagement; and/or
- is no longer economically viable.⁷⁴

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

- the school's audited financial statements for FY 2019 through FY 2023;
- the school's unaudited financial statements for FY 2024;
- the school's annual budget for FY 2024; and
- DC PCSB's Financial Analysis Report (FAR) of DC Bilingual PCS for FY 2019 through FY 2022.⁷⁵

Summary of Findings⁷⁶

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

- All the school's key performance indicators in the five-year period between FY 2019 and FY 2023 were above the floor, indicating strong financial performance, robust liquidity, and healthy sustainability.
- Since FY 2019, the school has been exceeding its yearly enrollment projections. In FY 2023, the school enrolled one student short of the maximum number of students permitted under its enrollment ceiling for that year.
- Occupancy expenses increased from FY 2022 to FY 2023 mainly due to the increases in depreciation, amortization, and interest expenses as the school invested in building improvements. The school incurred FY 2023 occupancy expenses as a percentage of facilities allowance above the FY 2023 sector median, however this is not a cause for concern as the school's portion of operating expenses incurred for

⁷³ Each percentage in Section Three of this report has been rounded to the nearest whole percentage.

⁷⁴ See D.C. Code § 38-1802.13(b).

⁷⁵ See DC Bilingual PCS's FAR Reports, Appendices N1 – N4.

⁷⁶ See Financial Definitions in Appendix O for more information about financial terms and indicators used in this report.

general expenses is below the sector median, offsetting the above-sector median occupancy expenses percentage of operating expenses.

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 imminent financial concerns; operations may not be adequately managed, sustainable, and/or economically viable; closer monitoring warranted

Key Measures and Comparisons

Enrollment and Operations

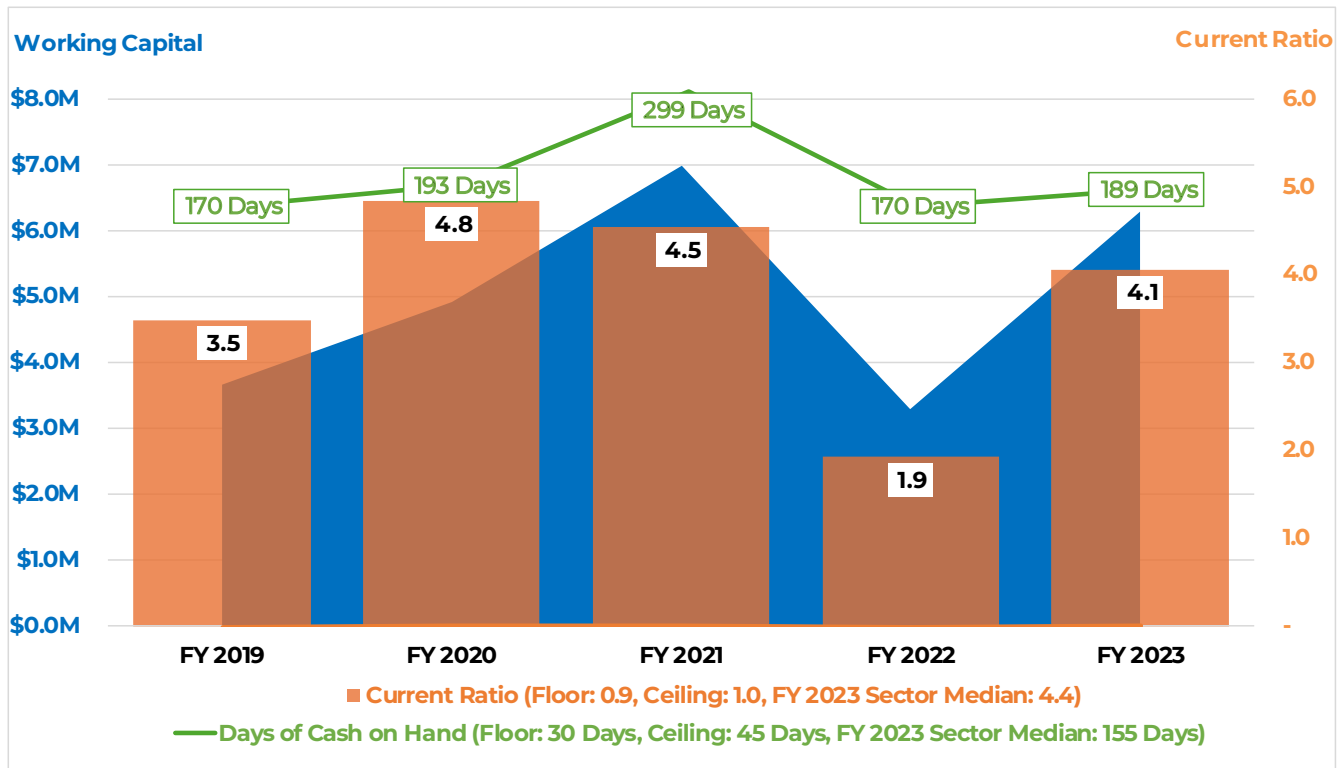
As reflected in the school's Enrollment, Operations, and Working Capital chart in the FY 2022 FAR,⁷⁷ in the four-year period from FY 2019 through FY 2022, the school's changes in net assets were positive each year, reflecting robust financial health. Change in net assets continued to be positive in FY 2023 but reflected a \$1.9M decrease from \$3.4M in FY 2022 to \$1.5M in FY 2023, mainly due to a \$2.1M decrease in the gain in fair value of interest rate swap from FY 2022 to FY 2023. The change in net assets margins, ranging between 0% and 19% from FY 2019 through FY 2022, allowed the school to invest almost all its funding to further its operations each year while increasing its sustainability, as reflected by the increase in primary reserve ratio from 0.5 at fiscal year-end (FYE) 2019 to 0.7 at FYE 2023.

The school steadily increased its enrollment each FY under review, reaching one student short of the maximum number of students permitted under its FY 2023 enrollment ceiling. If the school's enrollment growth continues as planned, changes in net assets, that are budgeted to be negative \$1.6M in FY 2024, are expected to rebound to positive changes in FY 2026.

Liquidity

The following chart provides a visual representation of some of the LEA's most significant liquidity indicators from FY 2019 to FY 2023, including working capital, current ratio, and days of cash on hand.

⁷⁷ See the school's Enrollment, Operations, and Working Capital chart on the first page DC Bilingual PCS's FY 2022 FAR Report, Appendix N4.



The school demonstrated robust liquidity in the past five years. Days of cash on hand at FYE 2019 through FYE 2023 ranged between 170 days and 299 days, averaging 204 days, above the 145-day average sector median over the same period, and consistently exceeding the 45-day target. The current ratio at FYE 2019 through FYE 2023 consistently exceeded the 1.0 target, growing from 3.5 at FYE 2019 to 4.1 at FYE 2023. The current ratio's decrease to 1.9 at FYE 2022 is not a cause for concern, as it was mainly due to the expected renovation and construction project costs at the school's 33 Riggs Road NE facility, partially paid for with the school's cash reserves. The cash flow from operations margin that averaged 9% in the five-year period between FY 2019 through FY 2023, below the 0% target only in FY 2019, reflects the school's ability to generate cash flow from carrying out its operations.

Facilities and Occupancy

The lease on the school's 33 Riggs Road NE building expires in 2048. In FY 2022 and FY 2023 combined, the school added \$19.7M in leasehold improvements. The school used cash reserves and debt proceeds to fund its construction and renovation work while reducing its exposure to interest rate risk by fixing most of its interest expenses with a swap agreement. The school's expenses for its facilities as a percentage of total DC facilities funding remained relatively stable between FY 2019 and FY 2022, ranging between 121%

Occupancy Expenses as a Percentage of Facilities Revenue ⁷⁸ FY 2023	
DC Bilingual PCS	182%
Sector Median	126%

⁷⁸ In the table, the school's percentage cell is shaded red if above the sector median (less desirable) and shaded green if below 100% (more desirable).

and 138%, and sharply increased to 182% in FY 2023, above the FY 2023 sector median, mainly due to the cumulative \$1.1M increase in depreciation, amortization, and interest expenses from the construction project. In FY 2023, the school spent 21% of its operating expenses on occupancy expenses, exceeding the 16% FY 2023 sector median. This is not a cause for concern, as the school offset the above-sector median with below-sector median general expenses, spending 9% of its total operating expenses on general expenses compared with the 11% FY 2023 sector median. The school's \$45 occupancy expenses per square foot is above the \$34 FY 2023 sector median.

Operations Performance and Sustainability and Selected Key Ratios

The following table reflects some elements and key financial indicators of the LEA's operations performance, debt burden, and sustainability, such as operating revenues and expenses, net assets, change in net assets margin, debt ratio, and primary reserve ratio.

Fiscal Year	FY 2019	FY 2020	FY 2021	FY 2022	FY 2023	FY 2023 Target	FY 2023 Sector Median	Multiyear Trend
Operating Revenues	\$11.7M	\$12.3M	\$13.6M	\$13.2M	\$16.5M	NA	NA	
Operating Expenses	\$10.4M	\$11.0M	\$11.0M	\$13.2M	\$16.2M	NA	NA	
Operating Revenues per Student	\$26,390	\$27,063	\$28,353	\$26,968	\$31,151	NA	\$31,151	
Operating Expenses per Student	\$23,472	\$24,362	\$22,921	\$26,877	\$30,661	NA	\$29,707	
Salaries and Benefits as a % of Operating Expenses	61%	63%	66%	67%	61%	NA	62%	
Change in Net Assets Margin*	11%	10%	19%	0%	2%	>= 0%	4%	
Net Assets	\$5.1M	\$6.3M	\$7.0M	\$10.4M	\$11.9M	NA	NA	
Primary Reserve Ratio*	0.5	0.6	0.6	0.8	0.7	>= 0.2	0.6	
Debt Ratio**	0.8	0.7	0.7	0.7	0.8	<= 0.5	0.6	

* Higher is better

** Lower is better

The school quickly grew its financial sustainability through its consistently above-target primary reserve ratio from 0.5 at FYE 2019 to 0.7 at FYE 2023. In the same five-year period, the debt ratio has remained above the 0.5 target but below the 0.9 floor. This is not a cause for concern due to the school's strong liquidity indicators and \$6.3M in working capital at FYE 2023, which is more than sufficient to service the school's yearly debt maturities.

Audit Findings

The school's annual independent auditor's reports for FY 2019 through FY 2023 reflected unmodified opinions and no audit findings on the school's financial reporting internal controls or Single Audits, except as follows. The school's FY 2019 Single Audit reflected a finding regarding the compliance with required procedures to ensure that a subcontractor is eligible for contracting in the federal award program. The finding was remediated in FY 2020 and not reported in the following years' Single Audits.