



Lea Crusey
Board Chair

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

July 22, 2024

Via Electronic Mail

Yalcin Akyildiz
Board Chair

Muhammet Turkey
Chief Executive Officer

Harmony DC Public Charter School
62 T Street NE
Washington, DC 20002

Re: 10-Year Charter Review of Harmony DC Public Charter School

Dear Dr. Akyildiz and Dr. Turkey:

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 Harmony DC 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 May 30, 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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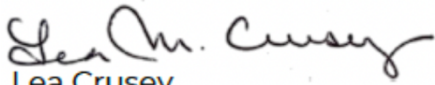
At its public board meeting on June 24, 2024, the DC PCSB Board voted to continue the school's charter for the reasons outlined in the review report and accompanying proposal, incorporating and adopting the staff's findings and recommendations.

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: Gina Lucchesi, Senior Specialist, School Performance Department

SUBJECT: Charter Review: Harmony DC Public Charter School

DATE: June 24, 2024

Recommendation

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

Charter Review Findings

DC PCSB staff conducted a 10-year charter review of Harmony 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 policies 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	Harmony PCS met its charter goals.
Compliance	Harmony PCS did not violate the law or materially violate its charter.
Finance	Harmony PCS did not commit fiscal mismanagement.

Harmony PCS Goal Attainment				
2018 – 19	2019 – 20	2020 – 21	2021 – 22	2022 – 23
PMF	Not applicable (NA)			Charter Goals Policy
53.5%				Met a Pathway

Harmony 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, the school committed to earning 50.0% of the possible PMF points in two of the most recent three school years and not under 45.0% in any of the past five school years. 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 Harmony PCS's charter goals performance using 1) SY 2018 – 19 PMF outcomes and 2) SY 2022 – 23 goal attainment pathway performance as outlined in DC PCSB's *Charter Goals Policy*.⁶

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 (OSSE's)

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: <https://bit.ly/3fy5zDo>.

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.

⁶ See the *Charter Goals Policy* here: <https://bit.ly/44xu4Hl>.

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.

School Transparency and Reporting (STAR) Framework.⁸ Per the policy, a school need only satisfy one pathway to meet its SY 2022 – 23 goals.

Harmony PCS met its charter goals by exceeding the PMF target of 45.0% in SY 2018 – 19 and improving growth outcomes in both English language arts (ELA) and math on its nationally normed growth assessment (Northwest Evaluation Association Measures of Academic Progress (NWEA MAP) for grades 3 – 5) from SY 2021 – 22 to SY 2022 – 23.

On its transitional goals measures, Harmony PCS improved its performance in ELA proficiency, math proficiency, and in-seat attendance (ISA) from SY 2021 – 22 to SY 2022 – 23. The school doubled its math proficiency rate from SY 2021 – 22 to SY 2022 – 23, achieving within 0.3 percentage points of the state average. However, Harmony PCS scored below the state average in all seven transitional goals measures⁹—pre-kindergarten (PK) classroom organization, PK emotional support, PK instructional support, ELA proficiency,¹⁰ math proficiency, ISA, and re-enrollment. In addition, Harmony PCS demonstrates a significant gender gap in math proficiency and growth. In SY 2022 – 23, nearly three times as many male students were proficient in math compared to female students. On average, male students were also improving in math faster than the national average, while female students were not.¹¹ Lastly, Harmony PCS's re-enrollment rates are significantly lower than the state average. In SY 2022 – 23, Harmony PCS's re-enrollment rate was 63.6%, which is 20.6 percentage points lower than the state average and 14.7 percentage points lower than the school's re-enrollment rate for SY 2021 – 22.¹²

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 the staff's recommendation

⁸ The *Charter Goals Policy* references OSSE's "STAR Framework," which is the former name of OSSE's accountability system. The report refers to this system as the "OSSE accountability system."

⁹ See Harmony PCS's transitional goals data for SY 2022 – 23 in the academic performance summary, located in Appendix B of the attached report.

¹⁰ The school's ELA proficiency rate for SY 2022 – 23 was 17.3%, which was 12.8 percentage points below the state average.

¹¹ See Harmony PCS's math proficiency rates and growth rates by gender in Appendix B of the attached report (pages 3 and 6).

¹² See Harmony PCS's re-enrollment data in Appendix B of the attached report (pages 2 – 4).

along with this proposal. The report will be finalized following the Board's vote on the school's continuance.

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

Additional Academic Data

Separate and apart from the school's goal attainment, DC PCSB staff conducted a Qualitative Site Review (QSR) at Harmony 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*.¹³

Harmony PCS had a higher percentage of core content classrooms rated proficient or distinguished in the instruction domain compared to the average percentage of comparable public charter classrooms that underwent a QSR in SY 2022 – 23.

However, the school's percentage in the classroom environment domain was slightly lower than average.

Charter Review Standard

The SRA stipulates that DC PCSB “shall review [a school's] charter at least once every [five] years.”¹⁴ 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.¹⁵

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.¹⁶

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

¹³ Danielson, Charlotte. *The Framework for Teaching: Evaluation Instrument*. Princeton, NJ: Danielson Group, 2013.

¹⁴ D.C. Code § 38-1802.12(a)(3).

¹⁵ D.C. Code § 38-1802.13(a).

¹⁶ DC PCSB may impose conditions of continuance if it deems such conditions appropriate.

accounting principles, 2) has engaged in a pattern of fiscal mismanagement, and/or 3) is no longer economically viable.¹⁷

Background

Harmony PCS began operation in 2014 under authorization from DC PCSB. The school educates 169 students in grades pre-kindergarten 3 – 5.¹⁸ The school operates one campus located in Ward 5. Harmony PCS's mission is:

To prepare students for higher learning in a safe, caring, and collaborative atmosphere through a quality learner-centered educational program with a strong emphasis on science, technology, engineering, and mathematics.

Notification

On May 2, 2024, DC PCSB staff notified Advisory Neighborhood Commissioners Patricia Williams (5F03), Jennifer Anderson (5F05), and Sylvia Pinkney (5F07) of the school's 10-year charter review. DC PCSB staff also posted a notice for public comment on the charter review in the DC Register and on the DC PCSB website.¹⁹

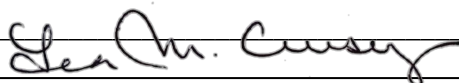
Attachment to this Proposal

Attachment A: Harmony PCS 10-Year Preliminary Charter Review Report

Date: June 24, 2024

DC PCSB Action: X Approved Approved with Changes Rejected

Changes to the Original Proposal:

Board Chair Signature: 

¹⁷ D.C. Code § 38-1802.13(b).

¹⁸ This enrollment figure is based on preliminary, unvalidated data as of May 28, 2024.

¹⁹ See the notice here: <https://bit.ly/4aEVcHJ>.



2023 – 24 10-Year Charter Review Report Harmony DC Public Charter School

June 24, 2024

DC Public Charter School Board
100 M Street SE, Suite 400
Washington, DC 20003
(202) 328-2660
www.dcpccb.org

TABLE OF CONTENTS

BOARD VOTE AND KEY FINDINGS	2
SCHOOL BACKGROUND	5
CHARTER REVIEW STANDARD	12
SECTION ONE: GOALS AND ACADEMIC ACHIEVEMENT EXPECTATIONS	13
SECTION TWO: COMPLIANCE WITH CHARTER AND APPLICABLE LAWS.....	16
SECTION THREE: FISCAL MANAGEMENT AND ECONOMIC VIABILITY.....	21

BOARD VOTE AND KEY FINDINGS¹

Harmony DC Public Charter School (Harmony PCS)^{2, 3}	
Review or Renewal	10-year charter review
Review Period	School year (SY) 2018 – 19 through SY 2022 – 23
Charter Goals	Harmony PCS met its charter goals.
Compliance	Harmony PCS did not violate the law or materially violate its charter.
Finance	Harmony PCS did not commit fiscal mismanagement.
Board Vote	The Board voted 6 – 0 to continue Harmony 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 10-year charter review of Harmony 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

Harmony 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, the school committed to earning 50.0% of the possible PMF points in two of the most recent three school years and not under 45.0% in any of the past five school years. 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 Harmony PCS’s charter goals performance using 1) SY 2018 – 19 PMF outcomes and 2) SY 2022 – 23 goal attainment pathway performance as outlined in DC PCSB’s *Charter Goals Policy*.⁸

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/3KkGZ87>.

³ See Harmony 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.

⁸ See the *Charter Goals Policy* here: <https://bit.ly/4cpui81>.

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.

Harmony PCS’s goal attainment results are as follows:

Harmony PCS Goal Attainment				
2018 – 19	2019 – 20	2020 – 21	2021 – 22	2022 – 23
PMF	NA			<i>Charter Goals Policy</i>
53.5%				Met a Pathway

Harmony PCS met its charter goals by exceeding the PMF target of 45.0% in SY 2018 – 19 and improving growth outcomes in both English language arts (ELA) and math on its nationally normed growth assessment (Northwest Evaluation Association Measures of Academic Progress (NWEA MAP) for grades 3 – 5) from SY 2021 – 22 to SY 2022 – 23.¹¹

Academic Performance Snapshot

Harmony PCS improved its performance in ELA proficiency,¹² math proficiency, and in-seat attendance (ISA) from SY 2021 – 22 to SY 2022 – 23. The school doubled its math proficiency rate from SY 2021 – 22 to SY 2022 – 23, achieving within 0.3 percentage points of the state average. However, Harmony PCS scored below the state average in all seven transitional goals measures—pre-kindergarten (PK) classroom organization, PK emotional support, PK instructional support, ELA proficiency,¹³ math proficiency, in-seat attendance (ISA), and re-enrollment. In addition, Harmony PCS demonstrates a significant gender gap in math proficiency and growth. In SY 2022 – 23, nearly three times as many male students were proficient in math compared to female students. On average, male students were also improving in math faster than the national average, while female students were not.¹⁴ Lastly, Harmony PCS’s re-enrollment rates are significantly lower than the state average. In

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 15.

¹² DC PCSB uses the school’s ELA and math proficiency rates on the Partnership for Assessment of Readiness for College and Careers (PARCC). A student is considered “proficient” in ELA or math if they earn a 4 or higher.

¹³ The school’s ELA proficiency rate for SY 2022 – 23 was 17.3%, which was 12.8 percentage points below the state average.

¹⁴ See Harmony PCS’s math proficiency rates and growth rates by gender on pages 3 and 6 of the academic performance summary for SY 2022 – 23, located in Appendix B.

SY 2022 – 23, Harmony PCS's re-enrollment rate was 63.6%, which is 20.6 percentage points lower than the state average and 14.7 percentage points lower than the school's re-enrollment rate for SY 2021 – 22.¹⁵ Separate and apart from the school's goal attainment, results from the Qualitative Site Review (QSR) suggest strong performance in the instruction domain and room for improvement in the classroom environment domain.¹⁶ The school had a higher percentage of core content classrooms rated proficient or distinguished in the instruction domain compared to the average percentage of comparable public charter classrooms that underwent a QSR in SY 2022 – 23. However, the school's percentage in the classroom environment domain was slightly lower than average.

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 June 24, 2024, the DC PCSB Board voted 6 – 0 to continue Harmony 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.

¹⁵ See Harmony PCS's re-enrollment data on pages 2 – 4 of Appendix B.

¹⁶ See the QSR section on pages 9 – 10 of this report for further details about each campus's QSR performance.

SCHOOL BACKGROUND

Harmony PCS			
Year Opened	2014	Ward(s)	5
Number of Campuses	1	Year(s) of Previous Review	2018 – 19
Chartered Grade Span	Pre-kindergarten 3 (PK3) – 5	Current Enrollment Ceiling	250
Current Enrollment and Grade Span¹⁷			
169, PK3 – 5			
Mission Statement			
To prepare students for higher learning in a safe, caring, and collaborative atmosphere through a quality learner-centered educational program with a strong emphasis on science, technology, engineering, and mathematics.			

School Overview

Harmony PCS began operation in 2014 under authorization from DC PCSB. DC PCSB originally authorized the local education agency (LEA)¹⁸ to serve grades kindergarten (K) – 12, but it never expanded beyond grade 5. After its five-year review, DC PCSB worked with the LEA to amend its charter so it is now authorized to serve only grades PK3 – 5. Harmony PCS operates one facility in Ward 5.

Harmony PCS is managed by the Harmony Public Schools organization, a charter school management organization located in Texas that runs an additional 56 public charter schools in that state. The organization focuses on science, technology, engineering, and mathematics (STEM) learning. Harmony PCS is the first Harmony school that operates outside of Texas.

Harmony PCS places a strong emphasis on STEM education and incorporates project-based learning into its curriculum. According to its annual report, Harmony PCS students can determine the focus of their projects based on their own unique interests.¹⁹ Student-driven projects require students to engage in higher-order thinking skills and are aligned with Common Core standards. Projects originate in the STEM program and are integrated with social studies and ELA components. Harmony PCS programs include robotics, engineering, and coding. Outside of school hours, Harmony PCS students can participate in after-school or Saturday tutoring.

¹⁷ This enrollment figure is based on preliminary, unvalidated data as of May 28, 2024.

¹⁸ An “LEA” is any individual or group of public charter schools operating under a single charter.

¹⁹ See page 2 of Harmony PCS’s Annual Report for SY 2022 – 23, Appendix C.

The school hosted citywide STEM events for DC students during the review period. In 2019 and 2023, Harmony PCS hosted citywide math contests for students in grades 3 – 5. In 2019, the school also hosted a STEM festival in which students demonstrated STEM projects to judges, parents, and community members.

Enrollment and Demographic Data

Harmony PCS enrolls students from every ward in the District. In SY 2022 – 23, nearly half of all Harmony PCS students lived in Ward 5, and most of the remaining students lived in Wards 1, 6, 7 and 8.²⁰ The tables below show the LEA's enrollment history.²¹

School Year	2018 – 19	2019 – 20	2020 – 21	2021 – 22	2022 – 23
Audited Enrollment ²²	112	118	113	140	159
Enrollment Projections ²³	120	136	112	157	154
Enrollment Ceiling ²⁴	480	250	250	250	250

School Year	2018 – 19	2019 – 20	2020 – 21	2021 – 22	2022 – 23
PK3	-	-	-	19	26
Pre-kindergarten 4 (PK4)	-	-	-	13	26
K	11	16	12	15	19
1	17	13	14	18	16
2	18	23	16	17	15
3	31	20	30	15	17
4	24	24	22	22	19
5	11	22	19	21	21

²⁰ LEA audited enrollment data by student home ward is provided to DC PCSB by OSSE. 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>.

²¹ The “-” symbol notes campuses that do not or did not enroll the corresponding grade(s) or student group(s).

²² OSSE conducts an annual enrollment audit to determine the number of students at each public school in the District.

²³ 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.

²⁴ 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 ²⁵	81.8%
Emerging Multilingual Learners (EML) ²⁶	1.9%
Students with Disabilities (SWD) ²⁷	26.4%
American Indian or Alaska Native	0.0%
Asian	0.0%
Black or African American	92.5%
Hispanic/Latino	3.1%
Multiracial	1.3%
Native Hawaiian or Other Pacific Islander	0.6%
White	2.5%

School Climate

The charts below report Harmony 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 Harmony PCS's school environment measures across the review period, please see Appendix D.

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.

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 ²⁸

²⁵ 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.

²⁶ 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.

²⁷ 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.

²⁸ DC PCSB does not report values when the n-size is less than 10.

SY 2022 – 23 Average OSS Rates					
School/Sector	Grade Band	All Students	At-Risk Students	EML	SWD
Harmony PCS	PK3 – PK4	0.0%	0.0%	n < 10	0.0%
Sector		0.0%	0.0%	0.0%	0.0%
Harmony PCS	K – 5	0.0%	0.0%	n < 10	0.0%
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.

Harmony PCS's MYW rates for all students, at-risk students, and SWD were consistently above corresponding sector averages throughout the review period, with the exception of SY 2020 – 21.²⁹

SY 2022 – 23 Average MYW Rates					
School/Sector	Grade Band	All Students	At-Risk Students	EML	SWD
Harmony PCS	PK3 – PK4	5.8%	7.0%	n < 10	n < 10
Sector		3.1%	3.8%	2.4%	2.4%
Harmony PCS	K – 5	5.6%	5.7%	n < 10	9.1%
Sector		3.8%	4.9%	2.2%	4.1%

ISA

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

Harmony PCS's ISA rates for all students, at-risk students, and SWD were consistently below sector averages throughout the review period, with the exception of the ISA rate for SWD in SY 2020 – 21.³⁰

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

²⁹ For a full report on Harmony PCS's MYW rates across the review period, please see Appendix D.

³⁰ For a full report on Harmony PCS's ISA rates across the review period, please see Appendix D.

SY 2022 – 23 Average ISA Rates					
School/Sector	Grade Band	All Students	At-Risk Students	EML	SWD
Harmony PCS	PK3 – PK4	82.0%	80.6%	n < 10	79.3%
Sector		84.7%	81.0%	86.5%	84.0%
Harmony PCS	K – 5	82.1%	80.3%	n < 10	83.3%
Sector		88.8%	85.9%	92.3%	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*.³¹ From March 6 – 17, 2023, in anticipation of this review, DC PCSB staff conducted a QSR at Harmony PCS.³²

In the classroom environment domain, observers noted that teachers frequently monitored student behavior, and teacher responses to student misbehavior were effective. Across classrooms, most students quickly followed directions, and any misbehaviors were minor. Observers also noted that interactions between teachers and students and amongst students were uniformly respectful. Teachers and students laughed and smiled with one another, and teachers also showed an interest in students' lives.

In the instruction domain, observers noted that teachers clearly stated what students would be learning and that their content explanations were clear. Across classrooms, teachers invited student participation and thinking during lessons. Observers also noted that in half of the classrooms, teachers posed open-ended questions, inviting students to think and offer multiple possible answers. As a result, in these classrooms, students engaged in rich discussion. However, in the other half of the classrooms observed, teachers posed many questions that had a single correct answer. As a result, student discussion was limited in these classrooms.

After conducting unannounced observations,³³ the QSR team rated the classroom environment and instruction as “unsatisfactory,” “basic,” “proficient,” or “distinguished.” The following chart details the percentage of Harmony 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.

³¹ Danielson, Charlotte. *The Framework for Teaching: Evaluation Instrument*. Princeton, NJ: Danielson Group, 2013.

³² See Harmony PCS QSR Report, Appendix E.

³³ 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 essential to the school's mission.

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

School/Sector	Classroom Environment	Instruction
Percentage of Classrooms Rated Proficient or Distinguished		
Harmony PCS	75.0%	73.5%
Average score for PK – 8 public charter schools	79.0%	68.8%

Harmony PCS scored below the average in the classroom environment domain and above the average in the instruction domain 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 ELA and math assignments Harmony 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.^{34, 35}

Of the five ELA samples Harmony PCS submitted, all five assignments received an overall rating of "sufficient." These assignments aligned to a high-quality, grade-appropriate text and contained questions that reached the full depth of the targeted standards. These assignments also required students to use what they learned in the text. They allowed students to either relate academic standards to the real world or to use their personal voice.

Of the five math samples Harmony PCS submitted, all five assignments received an overall rating of "sufficient." These assignments reached the full depth of the targeted standards. They also allowed students to engage with a mathematical practice at the appropriate depth and to relate academic content to the real world.

Previous Charter Reviews

Five-Year Review

In SY 2018 – 19, DC PCSB conducted a five-year review of Harmony PCS.³⁶ DC PCSB found

³⁴ See the protocol here: <https://bit.ly/3TiVZbS>.

³⁵ 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."

³⁶ See Harmony PCS's Five-Year Review Report, Appendix F.

that the school had not met the goals and student achievement expectations set out in its charter. Furthermore, DC PCSB could not apply the improvement provision because Harmony PCS had not demonstrated “consistent” improvement over the review period. However, DC PCSB noted that the school showed notable improvement during the final year of the review period, earning the third highest margin of growth among DC charter schools on the state assessment in SY 2017 – 18. Given the extensive turnaround efforts underway at the school, the Board exercised its discretion by voting to continue Harmony PCS’s charter with conditions. Conditions stipulated four academic criteria and one financial criterion. Harmony PCS was required to earn at least 45% on the PMF in school years 2018 – 19, 2019 – 20, and 2020 – 21;³⁷ amend its charter to eliminate its eligibility to serve grades 6 – 12; and decrease its enrollment ceiling from 480 to 250 students. Harmony PCS was allowed to expand to serve grades PK3 – PK4 beginning on SY 2019 – 20, provided that an early childhood operator with a track record of PK success deliver the PK curriculum and instruction. Lastly, Harmony PCS was required to provide evidence that at least \$500,000 per year had been secured for SY 2018 – 19 and SY 2019 – 20. The school met each of these conditions by SY 2020 – 21.

Communication with the School

In December 2023, DC PCSB staff met with Harmony PCS staff to discuss the school’s 10-year review. DC PCSB staff provided the school with an overview of the review process and an explanation of how DC PCSB assesses goal attainment for SY 2022 – 23 per the *Charter Goals Policy*.

³⁷ Due to the disruption in schooling and data collection during the COVID-19 pandemic, this condition was only applicable for SY 2018 – 19.

CHARTER REVIEW STANDARD

The SRA stipulates that DC PCSB “shall review [a school's] charter at least once every [five] years.”³⁸ 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.³⁹

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.⁴⁰

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.⁴¹

³⁸ D.C. Code § 38-1802.12(a)(3).

³⁹ D.C. Code § 38-1802.13(a).

⁴⁰ DC PCSB may impose conditions of continuance if it deems such conditions appropriate.

⁴¹ 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 December 2014,⁴² Harmony PCS adopted the PMF as its charter goals.⁴³ In November 2018,⁴⁴ following Harmony PCS's five-year review, the LEA agreed to the following review standard:

The [s]chool... must earn a score of at least 45% on the PK – 8 PMF in SY 2018 – 19, 2019 – 20, and 2020 – 21. [...] At its ten-year charter review in SY 2023 – 24, the [s]chool... will be deemed to have met its goals and academic expectations if it earns at least 50% of the possible PMF points in two of the most recent three years and not under 45% in any of the past five years.

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*.⁴⁵ Consequently, for this review period, DC PCSB evaluated Harmony PCS's progress meeting its charter goals using 1) SY 2018 – 19 PMF outcomes and 2) SY 2022 – 23 goal attainment pathway performance.

Harmony PCS's goal attainment results are as follows:

Harmony PCS Goal Attainment				
2018 – 19	2019 – 20	2020 – 21	2021 – 22	2022 – 23
PMF	NA			<i>Charter Goals Policy</i>
53.5%				Met a Pathway
<u>Determination:</u> Harmony PCS met its charter goals by exceeding the PMF target of 45.0% in SY 2018 – 19 and meeting a goal attainment pathway per the <i>Charter Goals Policy</i> in SY 2022 – 23.				

⁴² See Harmony PCS's Goals Charter Amendment, Appendix A2.

⁴³ For details, see the *2019 – 20 PMF Policy & Technical Guide* here: <https://bit.ly/2D2lvqc>.

⁴⁴ See Harmony PCS's Continuance Conditions Amendment, Appendix A3.

⁴⁵ See the *Charter Goals Policy* here: <https://bit.ly/4cpui8l>.

The remainder of Section One contains:⁴⁶

1. A description of the PMF and Harmony PCS's SY 2018 – 19 PMF outcomes; and
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.

The appendices to this report include a full summary of Harmony PCS's academic performance during the review period.⁴⁷

PMF Overview and Harmony PCS's SY 2018 – 19 PMF Outcomes

DC PCSB evaluated Harmony 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, Harmony PCS earned a score of 53.5% on the PMF (the equivalent of a “mid-performing” rating). In doing so, the school exceeded its PMF target of 45.0%.

Charter Goals Policy Pathway Overview and Harmony PCS's SY 2022 – 23 Pathway Performance⁴⁸

The *Charter Goals Policy* established four pathways for schools to demonstrate goal attainment in SY 2022 – 23. Per the policy, DC PCSB evaluated a school's SY 2022 – 23 goal attainment using the pathways in the order in which they appear.⁴⁹ A school need only meet one pathway to be deemed as having met its SY 2022 – 23 charter goals. The following table summarizes the pathways applicable to Harmony PCS.

SY 2022 – 23 Goal Attainment Pathways	
Pathway	How to Meet the Pathway
A: Individually Negotiated Goals	NA ⁵⁰
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>

⁴⁶ DC PCSB typically reports additional data about EML students' English language proficiency, as measured by the ACCESS for English Language Learners 2.0 (ACCESS) assessment. OSSE reports ACCESS growth for schools with 10 or more eligible test-takers. ACCESS data for Harmony PCS is not available because the school had fewer than 10 eligible test-takers throughout this review period.

⁴⁷ See Harmony PCS's SY 2018 – 19 PMF in Appendix G. See a complete summary of Harmony PCS's SY 2022 – 23 academic performance data in Appendix B.

⁴⁸ 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.

⁴⁹ DC PCSB first examined whether a campus met or exceeded the state or sector 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 or exceeded publisher growth criteria or demonstrated improvement from SY 2021 – 22 (Pathway C). If not, DC PCSB compared the campus's score on OSSE's accountability system to the 40.0% target (Pathway D). For details, see pages 11 – 13 of the *Charter Goals Policy* here: <https://bit.ly/4cpui81>.

⁵⁰ Pathway A only applies to LEAs with individually negotiated goals in their charter agreement.

SY 2022 – 23 Goal Attainment Pathways	
Pathway	How to Meet the Pathway
	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, Harmony PCS met Pathway C by demonstrating improvement from SY 2021 – 22 to SY 2022 – 23 in ELA and math on its nationally normed growth assessment, Northwest Evaluation Association's Measures of Academic Progress (NWEA MAP). See below for details about Harmony PCS's performance on Pathway C.

Charter Goals Policy Pathway C – Growth

NWEA MAP defines a median Conditional Growth Percentile (CGP) of 50.0 as average typical growth. A median CGP above 50.0 generally indicates those students are growing faster than academically similar peers in the NWEA norm-referenced population.⁵¹ The chart below indicates that Harmony PCS demonstrated improvement on the NWEA MAP ELA and math assessments for students in grades 3 – 5 from SY 2022 – 23 to SY 2021 – 22.

Pathway C: Demonstrate Improvement				
Measure	SY 2021 – 22 School Performance <i>Baseline</i>		SY 2022 – 23 School Performance	
	n-size	CGP	n-size	CGP
NWEA MAP: ELA	50	23.5	53	44.0
NWEA MAP: Math	50	27.5	53	40.0

⁵¹ CGP typically assesses the relative progress made year-to-year 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. See more information about NWEA MAP here: <https://bit.ly/3TvCxY8>.

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.”⁵² The SRA contains a non-exhaustive list of applicable laws, which DC PCSB monitors in its annual compliance reviews. Since SY 2018 – 19, Harmony PCS has been compliant with all applicable laws as captured in DC PCSB's compliance reviews.⁵³

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, the *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.⁵⁴

During fiscal year (FY) 2019, DC PCSB found Harmony PCS reported eight procurement contract packages, but it received one Early Warning Notice for failure to report complete procurement contract packages in a timely manner.

During FY 2020, Harmony PCS reported six procurement contract packages, but it received two Early Warning Notices for failure to report complete procurement contract packages in a timely manner.

⁵² D.C. Code § 38-1802.12(a)(3).

⁵³ See Harmony PCS's Compliance Review Reports, Appendices H1 – H5.

⁵⁴ 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, the school reported three procurement contract packages. The school did not receive any Early Warning Notices for failure to report complete procurement contract packages in a timely manner.

During FY 2022, the school reported six procurement contract packages. The school did not receive any Early Warning Notices for failure to report complete contract packages in a timely manner.

During FY 2023, the school reported seven procurement contract packages. The school did not receive any Early Warning Notices for failure to report complete contract packages in a timely manner.

Currently, DC PCSB has no major concerns about the LEA's compliance with procurement contract submission requirements. DC PCSB will continue to closely monitor the school's compliance to ensure Harmony 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 staff regularly reviews LEA data and practices to determine whether public charter schools are compliant with local and federal laws pertaining to EML students.⁵⁵ During the review period, Harmony PCS did not meet any criterion listed in the policy that would warrant a pre-audit warning or desk audit.

Special Education Compliance and Performance⁵⁶

Charter schools are required to comply with all federal and local special education laws, including the Individuals with Disabilities Education Act (IDEA)⁵⁷ and Section 504 of the Rehabilitation Act of 1973.⁵⁸ 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.⁵⁹

⁵⁵ See the *Emerging Multilingual Learner Audit and Monitoring Policy* here: <https://bit.ly/4c2XP86>.

⁵⁶ See OSSE's Glossary of Special Education Compliance Terms, Appendix I.

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

⁵⁸ 29 U.S.C. § 794.

⁵⁹ For more details, in this report, see the school climate information in the School Background section and Appendix D. Also see the supplemental academic data by student group in Appendix B.

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).⁶⁰ In 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 issue annual determinations for each LEA in accordance with U.S. Department of Education reporting requirements. OSSE's SEPR scores and levels are aligned with the IDEA annual determinations as seen in the table below.⁶¹

Percentage of Points from Applicable Measures ⁶²	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

IDEA Annual Determination Performance and SEPR Analysis

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

⁶⁰ See the SEPR for Harmony PCS for FFY 2021, Appendix J.

⁶¹ See Appendix K for more details about LEA performance and OSSE's enforcement actions for each IDEA Annual Determination and SEPR score level.

⁶² 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.)

FFY ⁶³	Percentage of Points from Applicable Measures	IDEA Annual Determination	SEPR Level
2018	85.2%	Meets Requirements	NA
2019	89.5%	Meets Requirements	
2020	89.5%	Meets Requirements	
2021	81.2%	Needs Assistance	Strengthening

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.

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

Performance Area	LEA Percent of Points Earned	Weight	Performance Area Points Earned
LEA Compliance	80%	35	28.0
Student Progress	65%	65	42.3
Total (points earned out of 100): 70.3			

OSSE Enforcement Actions

While Harmony PCS received a "Needs Assistance" designation in its 2021 Annual Determination, the LEA did not require any OSSE enforcement actions or interventions during the review period. Corrective action is only required when an LEA receives this determination for two consecutive years or more.

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 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).

⁶³ 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.

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.

Harmony PCS did not receive any state complaints or due process complaints during the review period.

DC PCSB Audit and Monitoring Actions

According to the *Special Education Audit and Monitoring Policy*,⁶⁴ DC PCSB staff regularly reviews LEA data and practices to determine whether public charter schools are compliant with local and federal laws pertaining to SWD.

During the review period, DC PCSB staff flagged Harmony PCS for one pre-audit warning because “a special education level of need (i.e., Level 1 – 4) comprises 75.0% or more of the total population of students with disabilities.”⁶⁵ See the chart below for more information on the audit resolution.

School Year	Audit Criteria	Type of Audit	Results
2018 – 19	SWD with Level 1 IEPs comprise more than 75% of total SWD enrollment	Pre-Audit Warning	No action was required; however, DC PCSB shared resources on Child Find and initial evaluation from OSSE and strongly encouraged the school to continue reviewing its SWD enrollment rate.

⁶⁴ 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>.

⁶⁵ 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."

SECTION THREE: FISCAL MANAGEMENT AND ECONOMIC VIABILITY⁶⁶

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.⁶⁷

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;
- DC PCSB's Financial Analysis Report (FAR) of Harmony PCS for FY 2019 through FY 2022,⁶⁸ and
- The school's Financial Corrective Action Plan (FCAP).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

- Due to low enrollment and poor financial performance, the school has operated under an FCAP since April 2019. The FCAP has financial conditions and milestones that must be met through June 2024. The FCAP's short-term goal was to leverage the school's philanthropic funding to increase its financial sustainability and liquidity through the grade expansion to PK. The long-term goal was for the school to reduce or eliminate its reliance on philanthropic funding to carry out its operations.
- Most of the school's key performance indicators in the five-year period between FY 2019 and FY 2023 reflected improvement and were above the floor, indicating healthier financial performance, liquidity, and sustainability. The school has been meeting its FCAP requirements each year of the review period.

⁶⁶ Each percentage in Section Three of this report has been rounded to the nearest whole percentage.

⁶⁷ See D.C. Code § 38-1802.13(b).

⁶⁸ See Harmony PCS's FAR Reports, Appendices L1 – L4.

⁶⁹ See Harmony PCS's FCAP, Appendix M.

⁷⁰ See Financial Definitions in Appendix N for more information about financial terms and indicators used in this report.

- Since FY 2021, the school's annual changes in net assets, net of philanthropic funding, have been positive, and liquidity has increased significantly, with days of cash on hand growing from 71 days at fiscal year-end (FYE) 2019 to 173 days at FYE 2023.

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

At the school's five-year review in November 2018, DC PCSB approved a set of conditions for the school's charter continuance, including an FCAP. DC PCSB approved the FCAP in April 2019 and amended it in October 2020. The main reasons for the FCAP condition were 1) the school's low enrollment, which caused the school to experience challenges maintaining financial liquidity since it began operation in FY 2015; and 2) the school's over-reliance on its line of credit and philanthropic funding in order to remain economically viable. The FCAP aimed to leverage the school's philanthropic funding in the short term to grow the school's net assets, reduce its line of credit, and ensure the school's liquidity would not deteriorate through the transition to serving PK grades. However, the FCAP noted that to remain economically viable in the long term, the school needed to reduce or eliminate its reliance on philanthropic funding, as such funding may not be consistent or predictable. From the FCAP's inception through December 31, 2023, the school has remained compliant with the FCAP requirements. The FCAP is scheduled to remain in effect until FYE 2024.

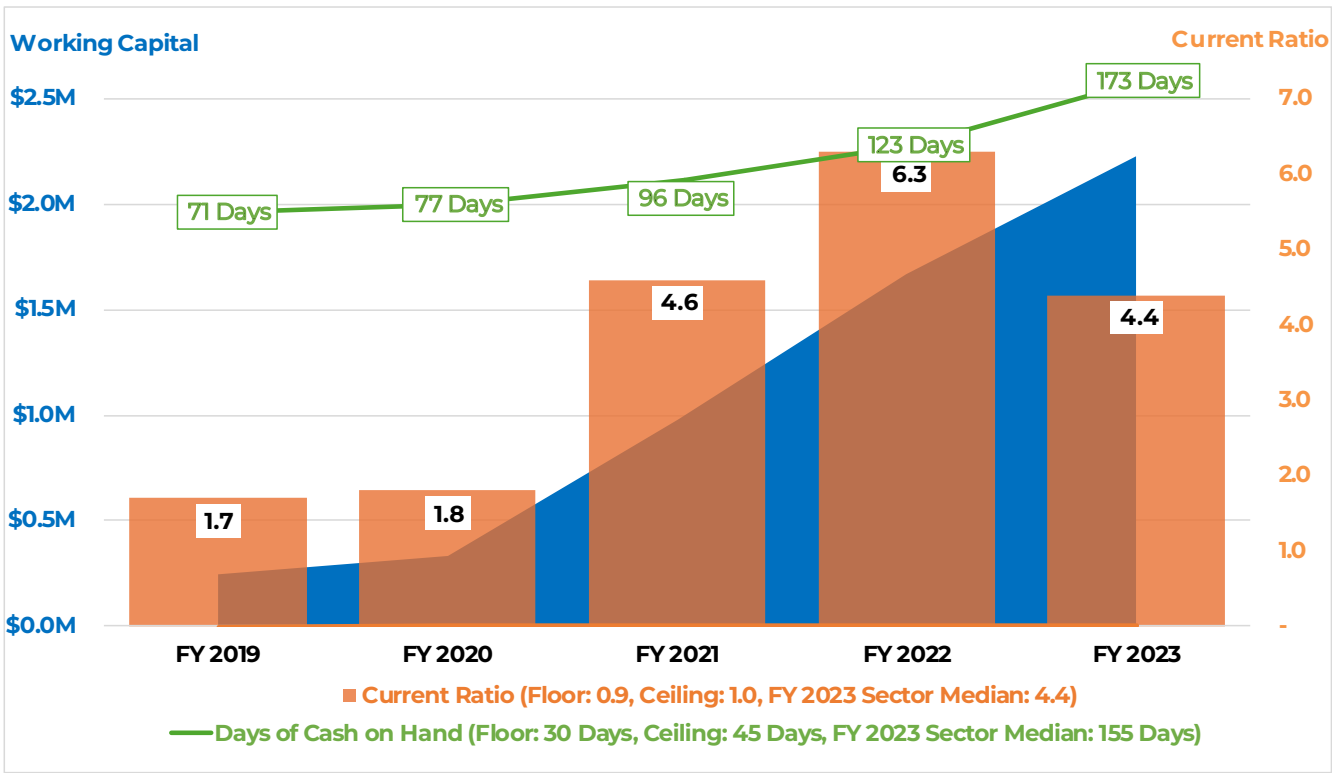
As reflected in the school's Enrollment, Operations, and Working Capital chart in its FY 2022 FAR, the school's net assets grew each year during the four-year period from FY 2019 through FY 2022, reflecting increasing financial sustainability.⁷¹ In FY 2023, the \$0.7M increase in net assets reflects a corresponding increase in enrollment of 19 students (14%). During the five-year period from FY 2019 through FY 2023, enrollment increased by 47 students (42%) from 112 in FY 2019 to 159 in FY 2023. This increase was mainly due to the expansion to PK3 and PK4 in FY 2022. The FY 2023 enrollment increase generated a \$0.8M (24%) increase in DC funding, which more than offset the \$0.4M (95%) decrease in private contributions, donations, and grants during the same FY, as the philanthropic funding from

⁷¹ See the school's Enrollment, Operations, and Working Capital chart on the first page of Harmony PCS's FY 2022 FAR Report, Appendix L4.

the school’s supporting organization for the purpose of assisting in its turnaround program subsidized. The school has demonstrated its ability to reduce reliance on philanthropic funding to achieve positive changes in net assets. Each year since FY 2021, the school reflected positive changes in net assets, net of private contributions, donations, and grants. Additionally, the school’s FY 2024 budget reflects continued non-reliance on philanthropic funding to break even.

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.



In line with the improved financial performance and sustainability, the school also demonstrated growing and healthier liquidity measures during the five-year period. Days of cash on hand at FYE 2019 through FYE 2023 increased each year from 71 days at FYE 2019 to 173 days at FYE 2023, consistently exceeding the 45-day target and FCAP requirement. The current ratio at FYE 2019 through FYE 2023 exceeded the 1.0 target, remaining between 1.7 and 6.3. The decrease from the 6.3 current ratio at FYE 2022 to 4.4 at FYE 2023 is not a cause for concern, as it is mainly due to the accounting changes following the implementation of the new lease accounting standard. The cash flow from operations margin averaged a healthy 10% over the five-year period, consistently above the 0% target

and 2% FCAP requirement each year, reflecting the school's ability to generate cash flow from its operations.

Facilities and Occupancy

The school's expenses for its facilities as a percentage of total DC facilities funding recognized from FY 2019 through FY 2023 were within 10 percentage points from the yearly sector median. In FY 2023, the school's \$33 occupancy expenses per square foot was close to the \$34 sector median.

Occupancy Expenses as a Percentage of Facilities Revenue ⁷² - FY 2023	
Harmony PCS	119%
Sector Median	126%

The LEA entered into a lease agreement at the beginning of FY 2015 for a facility located at 62 T Street NE. The school exercised its option to renew the agreement through FY 2023 and executed a third lease amendment in October 2022 to extend the lease term through July 2026.

⁷² 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).

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	\$2.9M	\$3.0M	\$3.8M	\$5.0M	\$5.5M	NA	NA	
Operating Expenses	\$2.8M	\$3.0M	\$3.1M	\$4.1M	\$4.7M	NA	NA	
Operating Revenues per Student	\$25,975	\$25,740	\$33,398	\$35,534	\$34,353	NA	\$31,151	
Operating Expenses per Student	\$24,737	\$25,062	\$27,416	\$29,340	\$29,852	NA	\$29,707	
Salaries and Benefits as a % of Operating Expenses	59%	63%	60%	57%	53%	NA	62%	
Change in Net Assets Margin*	5%	3%	18%	17%	13%	>= 0%	4%	
Net Assets	\$0.4M	\$0.5M	\$1.1M	\$2.0M	\$2.7M	NA	NA	
Primary Reserve Ratio*	0.1	0.2	0.4	0.5	0.6	>= 0.2	0.6	
Debt Ratio**	0.5	0.5	0.2	0.1	0.4	<= 0.5	0.6	

* Higher is better

** Lower is better

As described above, the increased enrollment during the five-year period, philanthropic support provided until FY 2022, and effective cost management enabled the school to

increase its financial sustainability from its 0.1 below-target primary reserve ratio at FYE 2019 to 0.6 above-target primary reserve ratio at FYE 2023. The school also remained above the primary reserve ratio FCAP requirements each year. In the same five-year period, the debt ratio decreased from 0.5 at FYE 2019 to 0.1 as of FYE 2022, as the school paid off its outstanding \$0.2M line of credit in FY 2021. However, as a result of the school's adoption of the new lease accounting standard in FY 2023, its debt ratio increased to 0.4 at FYE 2023, still favorably below the 0.5 target.

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.