



Shantelle Wright
Board Chair

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

July 22, 2025

Via Electronic Mail

Wendell Johns
Board Chair

Kathryn Procope
Executive Director

Howard University Middle School of Mathematics and Science Public Charter School
405 Howard Road Place NW
Washington, DC 20059

Re: 20-Year Charter Review of Howard University Middle School of Mathematics and Science Public Charter School

Dear Mr. Johns and Dr. Procope:

As required by the D.C. School Reform Act, the DC Public Charter School Board (DC PCSB) conducts 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 2024 – 25 school year, DC PCSB conducted a review of Howard University Middle School of Mathematics and Science Public Charter School.

DC PCSB staff prepared a comprehensive review report assessing the school's performance against the standard set by law.² On April 28, 2025, DC PCSB shared a draft of the report and invited feedback. DC PCSB staff reviewed the school's input and, where appropriate, incorporated it into a revised report that formed the basis of a formal staff proposal to the DC PCSB Board recommending charter continuance.

At the public board meeting on May 19, 2025, the DC PCSB Board voted to continue the school's charter for the reasons outlined in the report and proposal. School

¹ See DC Code § 38-1802.12(a)(3).

² See DC Code § 38-1802.13(a)-(b).



Shantelle Wright
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Executive Director

representatives were present and had the opportunity to speak before the Board, and members of the public were also invited to provide comment prior to the vote.

Enclosed, you will find the signed copy of the accompanying staff proposal and the full charter review report, which details the basis for the DC PCSB Board's decision.

Thank you for your continued leadership and service to the students of the District of Columbia.

Sincerely,

A handwritten signature in black ink, appearing to read "Shantelle Wright".

Shantelle Wright
Board Chair

A handwritten signature in black ink, appearing to read "Michelle J. Walker-Davis".

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

Non-Voting Board Items

- ☐ Public Hearing Item
- ☐ Discussion Item
- ☐ Read into Record

Policies

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

PREPARED BY: Gina Lucchesi, Manager, School Performance Department

SUBJECT: Charter Review: Howard University Middle School of Math and Science Public Charter School

DATE: May 19, 2025

Recommendation

District of Columbia Public Charter School Board (DC PCSB) staff recommends that its Board vote to continue the charter of Howard University Middle School of Math and Science Public Charter School (Howard University Middle 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 Howard University Middle 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

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.

expectations (charter goals); 2) compliance with its charter and applicable federal and local laws; and 3) 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) 2019 – 20 through SY 2023 – 24
Charter Goals	Howard University Middle PCS met its charter goals in SY 2022 – 23 and SY 2023 – 24.
Compliance	Howard University Middle PCS did not materially violate the law or its charter.
Finance	Howard University Middle PCS did not display a pattern of fiscal mismanagement and is economically viable.

Howard University Middle PCS adopted five individually negotiated charter goals. In doing so, the school committed to attaining the goal targets in its charter agreement throughout the review period. However, given the disruption in schooling and data collection during the COVID-19 pandemic, DC PCSB did not assess goal attainment for school years 2019 – 20, 2020 – 21, or 2021 – 22.³ Consequently, for this review period, DC PCSB staff assessed Howard University Middle PCS's charter goals performance using SY 2022 – 23 and SY 2023 – 24 goal attainment pathway performance as outlined in DC PCSB's *Charter Goals Policy*.⁴

The *Charter Goals Policy* offers multiple pathways to demonstrate goal attainment, including performance on individually negotiated goals and transitional goals.⁵ Per the policy, a school need only satisfy one pathway in each school year to meet its goals.

In SY 2022 – 23, Howard University Middle PCS fully met the growth pathway by demonstrating improvement in both reading and math on its nationally normed growth assessment, Northwest Evaluation Association Measures of Academic Progress (NWEA MAP).⁶ In SY 2023 – 24, Howard University Middle PCS fully met the individually negotiated goals pathway by exceeding the goal target or improving

³ See the *COVID-19 Impact Policy* here: <https://bit.ly/3fy5zDo>. (This policy has been superseded by the Charter Goals Policy, available here: <https://bit.ly/4cpui81>.)

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

⁵ "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, 2022 – 23, and 2023 – 24, DC PCSB collected transitional goals data from all schools to support evaluation during the COVID-19 recovery period.

⁶ See Section One of the attached report for more detail about Howard University Middle PCS's goal attainment.

performance from the prior school year on all four applicable individually negotiated charter goals.

Separate and apart from the school's goal attainment, results from the Qualitative Site Review (QSR) suggest that Howard University Middle PCS is performing just below proficient in the classroom environment domain and just above basic in the instruction domain.^{7,8}

DC PCSB staff also evaluated the school's compliance with applicable federal and local laws and with its charter. DC PCSB staff determined the school has not committed a material violation of law or of its charter.

DC PCSB staff also evaluated the school's fiscal management. DC PCSB staff determined that the school has not engaged in a pattern of nonadherence 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.⁹

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

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

⁷ QSR observers rate the classroom environment and instruction on the Charlotte Danielson *Framework for Teaching* scale from one to four: "1" indicates "unsatisfactory" performance, "2" indicates "basic," "3" indicates "proficient," and "4" indicates "distinguished."

⁸ See the QSR section in the attached report for further details about the school's QSR performance.

⁹ The report will be finalized following the Board's vote on the school's continuance.

¹⁰ D.C. Code § 38-1802.12(a)(3).

¹¹ D.C. Code § 38-1802.13(a).

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

Background

Howard University Middle PCS began operation in 2005 under authorization from DC PCSB. The school currently educates 271 students in grades 6 – 8.¹⁴ The school operates one campus located in Ward 1. Howard University Middle PCS's mission is:

To provide a sound foundation in all academic subjects, with a concentration in mathematics and science; the intellectual, social and emotional growth of each student will be nurtured, while an appreciation for diversity and sensitivity of all individuals will be encouraged in an enriched educational environment that will prepare students to succeed in high school and beyond.

Notification

On March 31, 2025, DC PCSB staff notified the following Advisory Neighborhood Commissioners of the school's 20-year charter review: Brad Howard (1E01), Audra Grant (1E02), Philippa Hawker (1E03), Rashida Brown (1E04), Philip Newland (1E05), Josh Jacobson (1E06), and Brian Footer (1E07). DC PCSB staff also posted a notice for public comment on the charter review in the DC Register and on the DC PCSB website.¹⁵

Attachment to this Proposal

Attachment A: Howard University Middle PCS 20-Year Preliminary Charter Review Report

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

¹³ D.C. Code § 38-1802.13(b).

¹⁴ This enrollment figure is based on preliminary, unvalidated data as of March 25, 2025.

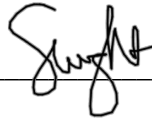
¹⁵ See the notice here: <https://bit.ly/44BHtlt>.

Date: May 19, 2025

DC PCSB Action: X Approved ____ Approved with Changes ____ Rejected

Changes to the Original Proposal:

Board Chair Signature: _____





2024 – 25 20-Year Charter Review Report Howard University Middle School of Math and Science Public Charter School

May 19, 2025

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Appendices: <https://bit.ly/3FipeqF>

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

BOARD VOTE AND KEY FINDINGS

Howard University Middle School of Math and Science Public Charter School (Howard University Middle PCS)²	
Review or Renewal	20-year charter review
Review Period	School year (SY) 2019 – 20 through SY 2023 – 24
Charter Goals	Howard University Middle PCS met its charter goals in SY 2022 – 23 and SY 2023 – 24.
Compliance	Howard University Middle PCS did not materially violate the law or its charter.
Finance	Howard University Middle PCS did not display a pattern of fiscal mismanagement and is economically viable.
Board Vote	The Board voted 6 – 0 to continue Howard University Middle 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.”³ During SY 2024 – 25, DC PCSB conducted a 20-year charter review of Howard University Middle 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.

Goals and Academic Achievement Expectations (Charter Goals)

Howard University Middle PCS adopted five individually negotiated charter goals.⁴ In doing so, the school committed to attaining the goal targets in its charter agreement throughout the review period. However, given the disruption in schooling and data collection during the COVID-19 pandemic, DC PCSB did not assess goal attainment for school years 2019 – 20, 2020 – 21, or 2021 – 22.⁵ Consequently, for this review period, DC PCSB assessed Howard University Middle PCS’s charter goals performance using SY 2022 – 23 and SY 2023 – 24 goal attainment pathway performance as outlined in DC PCSB’s *Charter Goals Policy*.⁶

The *Charter Goals Policy* offers multiple pathways to demonstrate goal attainment, including performance on individually negotiated goals and transitional goals.⁷ Per the policy, a school need only satisfy one pathway in each school year to meet its goals.

² See Howard University Middle PCS’s Charter Agreement, Appendix A. All appendices are located here: <https://bit.ly/3FipeqF>.

³ D.C. Code § 38-1802.12(a)(3).

⁴ See Howard University Middle PCS Charter Renewal Agreement, Appendix A.

⁵ See the *COVID-19 Impact Policy* here: <https://bit.ly/3fy5zDo>. (This policy has been superseded by the Charter Goals Policy, available here: <https://bit.ly/4cpui81>.)

⁶ See the *Charter Goals Policy* here: <https://bit.ly/4cpui81>.

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,

In SY 2022 – 23, Howard University Middle PCS fully met the growth pathway by demonstrating improvement in both reading and math on its nationally normed growth assessment, Northwest Evaluation Association Measures of Academic Progress (NWEA MAP).⁸ In SY 2023 – 24, Howard University Middle PCS fully met the individually negotiated goals pathway by exceeding the goal target or improving performance from the prior school year on all four applicable individually negotiated goals.

Howard University Middle PCS demonstrated strong performance in in-seat attendance and re-enrollment, exceeding the state/sector rate in both measures in SY 2022 – 23 and SY 2023 – 24. The above-state re-enrollment rate may indicate that students and families are satisfied with the school.

Key areas of improvement for Howard University Middle PCS include English language arts (ELA) and math performance.⁹

- *ELA Performance:* In SY 2022 – 23 and SY 2023 – 24, Howard University Middle PCS's ELA state assessment proficiency rates lagged state rates by approximately 6 – 7 percentage points. However, the school improved its ELA proficiency rate from 22.8% in SY 2022 – 23 to 28.0% in SY 2023 – 24. In SY 2022 – 23 and SY 2023 – 24, the school significantly lagged the median Conditional Growth Percentile (CGP) of 50 on NWEA MAP, indicating Howard University Middle PCS students grew slower than their academically similar peers nationwide in reading. However, Howard University Middle PCS improved its reading CGP from SY 2021 – 22 to SY 2022 – 23, contributing to its goal determination of “Met” for SY 2022 – 23 via the growth pathway.¹⁰ In addition, the school met the Median Growth Percentile (MGP) on the state assessment in ELA in SY 2023 – 24. This indicates that Howard University Middle PCS students' growth in ELA was on par with their academically similar peers statewide.
- *Math Performance:* In SY 2022 – 23 and SY 2023 – 24, Howard University Middle PCS's math state assessment proficiency rates significantly lagged state rates. The school's math proficiency rate declined from 9.0% in SY 2021 – 22 to 6.8% in SY 2023 – 24. In SY 2022 – 23 and SY 2023 – 24, the school significantly lagged the median CGP of 50 on NWEA MAP, indicating Howard University Middle PCS students grew slower than their academically similar peers nationwide in math. However, Howard University Middle PCS improved its math CGP from SY 2021 – 22 to SY 2022 – 23, contributing to its goal determination of “Met” for SY 2022 – 23 via the growth pathway.¹¹

2022 – 23, and 2023 – 24, DC PCSB collected transitional goals data from all schools to support evaluation during the COVID-19 recovery period.

⁸ See Section One of this report for more detail about Howard University Middle PCS's goal attainment.

⁹ See pages 34 – 44 of the *PMF Policy & Technical Guide* for more details about the data sources and methodology for academic measures in this report: <https://bit.ly/2D2lvqc>.

¹⁰ For details about Howard University Middle PCS's goal determination, see Section One of this report.

¹¹ For details about Howard University Middle PCS's goal determination, see Section One of this report.

Separate and apart from the school's goal attainment, during the Qualitative Site Review (QSR), observations of Howard University Middle PCS's programming rated just below proficient in the classroom environment domain and just above basic in the instruction domain.^{12,13} Howard University Middle PCS's special education programming rated basic in the instruction domain. As a result, DC PCSB flagged Howard University Middle PCS for a special education-focused desk audit, which identified a lack of inclusive instructional strategies in the school's professional development offerings.¹⁴

Compliance

DC PCSB determined the school has not committed a material violation of law or of its charter.

Finance

DC PCSB determined the school has not engaged in a pattern of nonadherence 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 May 19, 2025, the DC PCSB Board voted 6 – 0 to continue Howard University Middle 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.

¹² QSR observers rate the classroom environment and instruction on the Charlotte Danielson *Framework for Teaching* scale from one to four: "1" indicates "unsatisfactory" performance, "2" indicates "basic," "3" indicates "proficient," and "4" indicates "distinguished."

¹³ See the QSR section on page 19 of this report for further details about the school's QSR performance.

¹⁴ For details, see the QSR section on page 19 and the Special Education Section on page 23.

SCHOOL BACKGROUND

Howard University Middle PCS			
Year Opened	2005	Ward(s)	1
Number of Campuses	1	Year(s) of Previous Review	2010 – 11, 2014 – 15, 2019 – 20
Chartered Grade Span	6 – 8	Current Enrollment Ceiling	500
Audited Enrollment and Grade Span (SY 2024 – 25)			
271, 6 – 8			
Mission Statement			
To provide a sound foundation in all academic subjects, with a concentration in mathematics and science; the intellectual, social and emotional growth of each student will be nurtured, while an appreciation for diversity and sensitivity of all individuals will be encouraged in an enriched educational environment that will prepare students to succeed in high school and beyond.			

School Overview

Howard University Middle PCS began operation in 2005 under authorization from DC PCSB to serve students in grades 6 – 8. The local education agency (LEA)¹⁵ offers programming that emphasizes science, technology, engineering, and mathematics (STEM).

Howard University Middle PCS is located on the campus of Howard University, a renowned historically Black university. The LEA partners with numerous schools at Howard University, which provide resources to staff and students.¹⁶ For example, a partnership with the School of Pharmacy led to participation in a grant program that supported eighth graders to access mentorship and summer enrichment programs. The Schools of Chemistry and Biology engage students in hands-on experiments. The School of Dentistry provides preventative dental care to all students, and the School of Social Work provides interns who support student wellness. Howard University Middle PCS students engage in hands-on STEM projects and attend workshops led by Howard University professors.

Enrollment and Demographic Data

Howard University Middle PCS enrolls students from nearly every ward in the District.¹⁷ In SY 2023 – 24, most Howard University Middle PCS students lived in Wards 1, 5, 6, 7, and 8. The tables below show the LEA's enrollment history.

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

¹⁶ See Howard University Middle PCS's annual report for SY 2023 – 24, Appendix B.

¹⁷ OSSE provides LEA-level 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/4IospWv>.

Enrollment Measure	School Year				
	2019 – 20	2020 – 21	2021 – 22	2022 – 23	2023 – 24
Audited Enrollment ¹⁸	291	287	282	284	253
Enrollment Projections ¹⁹	288	293	295	286	268
Enrollment Ceiling ²⁰	500	500	500	500	500

Grade	School Year				
	2019 – 20	2020 – 21	2021 – 22	2022 – 23	2023 – 24
6	114	106	97	100	80
7	96	95	103	90	94
8	81	86	82	94	79

The chart below shows the school's student demographics in SY 2023 – 24.

Student Group	Percentage Enrolled
At-Risk or Economically Disadvantaged Students ²¹	64.8%
Emerging Multilingual Learners (EML) ²²	4.0%
Students with Disabilities (SWD) ²³	11.9%
American Indian or Alaska Native	0.4%
Asian	0.4%
Black or African American	95.3%
Hispanic/Latino	3.6%
Multiracial	0.4%
Native Hawaiian or Other Pacific Islander	0.0%
White	0.0%

School Climate

¹⁸ OSSE conducts an annual enrollment audit to determine the number of students at each public school in the District.

¹⁹ 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.

²⁰ 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.

²¹ 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. “Economically disadvantaged” students are defined as meeting one or more of criteria a, b, or c. For schools serving grades PK – 8, percentages of at-risk students and economically disadvantaged students are identical.

²² EML students are students who 1) speak a primary language other than English and 2) have been screened and determined eligible for English language development services. An EML student may have difficulty speaking, reading, writing, or understanding the English language.

²³ 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.

The charts below report Howard University Middle PCS's performance in school years 2022 – 23 and 2023 – 24 across three school environment measures: out-of-school suspension (OSS) rates, mid-year withdrawal (MYW) rates, and in-seat attendance (ISA) rates. DC PCSB presents these measures by grade band and student group and compares them to the relevant rates for the DC public charter sector.²⁴ Isolating school environment measures by student groups helps to identify whether there may be access and opportunity disparities. For a full report on Howard University Middle PCS's school environment measures across the review period, please see Appendix C.

Key for OSS and MYW Rates	
Blue	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 ²⁵

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.²⁶

As the tables below and in Appendix C show, Howard University Middle PCS's OSS rates for all students, at-risk students, EMLs, and SWD were above corresponding sector rates for school years 2019 – 20, 2022 – 23, and 2023 – 24.

Two-Year Average ²⁷ OSS Rates					
School/Sector	Grade Band	All Students	At-Risk Students	EML	SWD
Howard University Middle PCS	6 – 8	18.0%	19.6%	9.1%	22.7%
Sector		11.7%	15.6%	4.1%	15.5%

MYW

The MYW rate is the percentage of students who have withdrawn from school during the school year.²⁸

²⁴ In the following tables, the EML student group includes active EML students only. (Monitored Years 1 – 4 EML students are not included.) An "active EML student" is a student currently participating in EML programming. A "monitored EML student" is a student who has met the English language proficiency level to exit EML programming. After exiting EML programming, students are monitored for four years to ensure they did not exit the program prematurely.

²⁵ DC PCSB does not report values when the n-size is less than 10.

²⁶ The student universe for OSS includes students who were ever enrolled at the school in a given year (i.e., students in the enrollment audit and those who were not).

²⁷ Each table in this section reports two-year average rates for school years 2022 – 23 and 2023 – 24.

²⁸ The student universe for MYW includes audited students only.

Two-Year Average MYW Rates (SY 2022 – 23 and SY 2023 – 24)					
School/Sector	Grade Band	All Students	At-Risk Students	EML	SWD
Howard University Middle PCS	6 – 8	4.5%	4.5%	0.0%	5.6%
Sector		3.8%	5.0%	1.8%	4.6%

ISA

The ISA rate is the percentage of students who were present each day.²⁹

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

Two-Year Average ISA Rates (SY 2022 – 23 and SY 2023 – 24)					
School/Sector	Grade Band	All Students	At-Risk Students	EML	SWD
Howard University Middle PCS	6 – 8	91.4%	90.4%	93.5%	91.2%
Sector		89.6%	87.0%	92.0%	87.2%

Previous Charter Reviews

Five-Year Review

In SY 2010 – 11, DC PCSB conducted a five-year review of Howard University Middle PCS and found the school met the standard for charter continuance.³⁰ Based on these findings, in February 2011, DC PCSB voted to continue Howard University Middle PCS's charter.

10-Year Review

In SY 2014 – 15, DC PCSB conducted a 10-year review of Howard University Middle PCS and found the school met the standard for charter continuance.³¹ DC PCSB determined that the school met nine goals and substantially met the other two goals. The report noted that the school's math and ELA scores on the DC Comprehensive Assessment System (DC CAS)³²

²⁹ DC PCSB recently changed its business rules for calculating ISA rates to align with attendance measures evaluated in its accountability system, ASPIRE. For SY 2019 – 20, SY 2020 – 21, and SY 2021 – 22, Howard University Middle PCS's ISA rates include students who were enrolled for at least 10 instructional days. For SY 2022 – 23 and SY 2023 – 24, Howard University Middle PCS's ISA rates include students who were enrolled for more than 20 instructional days.

³⁰ See Howard University Middle PCS's Five-Year Review Report, Appendix D1.

³¹ See Howard University Middle PCS's 10-Year Review Report, Appendix D2.

³² The DC CAS was the state assessment in Washington, DC until SY 2014 – 15 when the state adopted the Partnership for Assessment of Readiness for College and Careers (PARCC).

were approximately 20 percentage points above the state rate throughout the review period. Based on these findings, in November 2014, DC PCSB voted to continue Howard University Middle PCS's charter.

15-Year Renewal

In SY 2019 – 20, DC PCSB conducted a 15-year renewal of Howard University Middle PCS and found the school met the standard for renewal.³³ DC PCSB determined that the school met its goals and student achievement expectations. Of 10 applicable goals, Howard University Middle PCS met four, substantially met three, and partially met three. The renewal analysis revealed academic concerns, including below-average academic growth in ELA and math and low Performance Management Framework (PMF) scores for three of four years. DC PCSB determined that the school had not committed a material violation of the law or of its charter but noted concerns about the school's "continued struggles" to comply with laws relating to the education of students with disabilities. Based on these findings, in November 2019, DC PCSB voted to renew Howard University Middle PCS's charter for another 15-year term. Consistent with DC PCSB staff's recommendation, the charter renewal agreement includes revised academic goals with clear business rules and performance targets.

Communication with the School

In September 2024, DC PCSB staff met with Howard University Middle PCS staff to discuss the school's 20-year review. DC PCSB staff explained how DC PCSB assesses goal attainment for SY 2022 – 23 and SY 2023 – 24 per the *Charter Goals Policy*. DC PCSB staff also discussed the school's goal performance during SY 2022 – 23.

³³ See Howard University Middle PCS's 15-year Renewal Report, Appendix D3.

CHARTER REVIEW STANDARD

The SRA stipulates that DC PCSB “shall review [a school's] charter at least once every [five] years.”³⁴ 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.³⁵

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.³⁶

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.³⁷

³⁴ D.C. Code § 38-1802.12(a)(3).

³⁵ D.C. Code § 38-1802.13(a).

³⁶ DC PCSB may impose conditions of continuance if it deems such conditions appropriate.

³⁷ 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 July 2020,³⁸ Howard University Middle PCS adopted individually negotiated charter goals.³⁹ In doing so, the LEA agreed to be assessed annually using the specified measures and targets.

As previously noted, DC PCSB did not assess goal attainment for school years 2019 – 20, 2020 – 21, or 2021 – 22.⁴⁰ For SY 2022 – 23 and SY 2023 – 24, DC PCSB resumed goal attainment assessment using pathways established in its *Charter Goals Policy*.⁴¹

Howard University Middle PCS's goal attainment results are as follows:

Howard University Middle PCS Goal Attainment				
2019 – 20	2020 – 21	2021 – 22	2022 – 23	2023 – 24
NA			Met	Met

The remainder of Section One contains:

1. An overview of the goal attainment pathways in the *Charter Goals Policy* applicable to Howard University Middle PCS;
2. An explanation of Howard University Middle PCS's goal attainment for SY 2022 – 23 and SY 2023 – 24;
3. Data pertaining to the school's academic performance on each applicable goal attainment pathway; and
4. Additional academic information not included in Howard University Middle PCS's goal attainment assessment.⁴²

Appendix E shows Howard University Middle PCS's academic performance by student group during the review period.

Charter Goals Policy Pathways Overview

The *Charter Goals Policy* established pathways for schools to demonstrate goal attainment for SY 2022 – 23 and SY 2023 – 24. DC PCSB evaluated goal attainment using the pathways

³⁸ See Howard University Middle PCS's Charter Renewal Agreement, Appendix A.

³⁹ For details, see the 2019 – 20 PMF Policy & Technical Guide here: <https://bit.ly/2D2lvqc>.

⁴⁰ See the COVID-19 Impact Policy here: <https://bit.ly/3fy5zDo>.

⁴¹ See the Charter Goals Policy here: <https://bit.ly/4cpui8l>.

⁴² 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 Howard University Middle PCS is not available because the school had fewer than 10 eligible test-takers throughout this review period.

in the order in which they appear.⁴³ A school need only meet one pathway in each school year to be deemed as having met its charter goals. The following table summarizes the pathways applicable to Howard University Middle PCS.

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 prior year data. ⁴⁴
B: Transitional Goals	For each applicable transitional goals data measure (excluding nationally normed growth assessments): Meet or exceed state performance (sector performance when state is unavailable) <u>OR</u> demonstrate improvement compared to prior year data. ^{45, 46}
C: Growth	SY 2022 – 23
	For school-selected, nationally normed growth assessment: Meet or exceed publisher growth criteria on ELA/reading and math subject tests compared to the publisher's national performance rates <u>OR</u> demonstrate improvement compared to SY 2021 – 22 baseline data.
	SY 2023 – 24
	Meet or exceed publisher growth criteria on school-selected, nationally normed growth assessments for ELA/reading and math subject tests compared to the publisher's national performance rates; <u>OR</u> for PK – 8 schools, meet or exceed a Median Growth Percentile (MGP) of 50.0 on DC Comprehensive Assessments of Progress in Education (DC CAPE) ⁴⁷ in ELA and math.

⁴³ To assess SY 2022 – 23 goal attainment, DC PCSB first examined whether a campus met or exceeded the state or sector rate or demonstrated improvement from the prior year 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 the OSSE DC School Report Card to the 40.0% target (Pathway D). DC PCSB used a similar process to assess SY 2023 – 24 goal attainment. For details, see pages 11 – 13 of the *Charter Goals Policy* here: <https://bit.ly/4cpui8l>.

⁴⁴ Pathway A applies to LEAs with individually negotiated goals in their charter agreement.

⁴⁵ In some instances, DC PCSB may be unable to assess improvement for transitional goals due to lack of prior year data, or a change in assessment or measure calculation.

⁴⁶ If the overall targets are not met, DC PCSB may consider student group performance on transitional goals. DC PCSB will primarily review performance among at-risk, students with disabilities, and emerging multilingual learner student groups. DC PCSB receives student-level demographic designations from OSSE.

⁴⁷ From 2015 to 2023, DC was a member of the Partnership for Assessment of Readiness for College and Careers (PARCC) and administered PARCC assessments in ELA and math. In 2023, the PARCC consortium ceased to

Goal Attainment Pathways	
Pathway	How to Meet the Pathway
D: OSSE Accountability	Earn a 40.0% or higher on OSSE's DC School Report Card.

Howard University Middle PCS's Goal Attainment

SY 2022 – 23 Goal Attainment

In SY 2022 – 23, Howard University Middle PCS met Pathway C by demonstrating improvement in both reading and math on its nationally normed growth assessment, NWEA MAP. See the Pathway C Performance section on page 18 for details about Howard University Middle PCS's performance on Pathway C.

SY 2023 – 24 Goal Attainment

In SY 2023 – 24, Howard University Middle PCS met Pathway A by exceeding the goal target or improving performance from the prior school year on all four applicable individually negotiated goals. See the Pathway A Performance section on pages 13 – 15 for details about Howard University Middle PCS's performance on Pathway A.

Howard University Middle PCS's Academic Performance Data by Pathway

Pathway A (Individually Negotiated Goals) Performance

Per Howard University Middle PCS's charter agreement,⁴⁸ DC PCSB evaluated the individually negotiated goals below for SY 2022 – 23 and SY 2023 – 24. 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 prior year performance.

Key for Charter Goals Chart	
Blue	Equal to or greater than the target <u>or</u> improvement compared to prior year performance
Red	Less than the target <u>and</u> no improvement compared to prior year performance
Grey	Data not available (NA) or data not used for goal determination
n < 10	The number of test takers (n-size) is less than 10

Individually negotiated goals:

1. Annually, the school will be deemed to have met this goal if at least **two** of the following three measures are met:

exist. DC implemented a new name for the same state assessments—DC CAPE. For details, see here: <https://bit.ly/4qjDL2S>.

⁴⁸ See Howard University Middle PCS's Charter Agreement, Appendix A1.

- a. The percent of students scoring level 4+ on the PARCC ELA assessment will meet or exceed the state average for students scoring 4+ in ELA;
 - b. The percent of students scoring level 3+ on the PARCC ELA assessment will meet or exceed the state average for students scoring 3+ in ELA;
 - c. At least 60.0% of all students will achieve at or above the 50th percentile or meet/exceed their spring growth targets in ELA on the NWEA MAP's national norms by the spring test administration each year.
2. Annually, the school will be deemed to have met this goal if at least **two** of the following three measures are met:
 - a. The percent of students scoring level 4+ on the PARCC math assessment will meet or exceed the state average for students scoring 4+ in math;
 - b. The percent of students scoring level 3+ on the PARCC math assessment will meet or exceed the state average for students scoring 3+ in math;
 - c. At least 60.0% of all students will achieve at or above the 50th percentile or meet/exceed their spring growth targets in math on the NWEA MAP's national norms by the spring test administration each year.
3. At least 50.0% of all students in all grade levels will meet or exceed their spring growth targets in science based on NWEA MAP's national norms by the spring test administration each year.
4. The school will achieve annual ISA rate that meets/exceeds the state average for middle school students in the District of Columbia.
5. The school will achieve a re-enrollment rate of at least 75.0% across the annual review period.

Individually Negotiated Goal Performance									
Goal		2019 – 20	2020 – 21	2021 – 22		2022 – 23		2023 – 24	
1	a	NA		Rate	Target	Rate	Target	Rate	Target
				24.5	NA	22.8	36.3	27.5	36.3
				n=269		n=268		n=236	
	b	NA		Rate	Target	Rate	Target	Rate	Target
				53.9	NA	48.9	59.9	58.1	59.4
				n=269		n=268		n=236	
	c	NA		Rate	Target	Rate	Target	Rate	Target
				49.5	60.0	26.8	60.0	52.7	60.0
				n=273		n=133		n=128	
2	a	NA		Rate	Target	Rate	Target	Rate	Target
				<5.0	NA	9.0	17.8	6.8	19.3

Individually Negotiated Goal Performance									
Goal		2019 – 20	2020 – 21	2021 – 22		2022 – 23		2023 – 24	
				n=265		n=268		n=235	
	b	NA		Rate	Target	Rate	Target	Rate	Target
				25.7	NA	31.7	39.9	31.9	41.4
				n=265		n=268		n=235	
	c	NA		Rate	Target	Rate	Target	Rate	Target
				41.0	60.0	16.2	60.0	56.8	60.0
n=273				n=101		n=135			
3	NA		Rate	Target	Rate	Target	Rate	Target	
			39.6	50.0	23.9	50.0	40.5	50.0	
			n=273		n=115		n=105		
4	NA		Rate	Target	Rate	Target	Rate	Target	
			91.4	NA	93.1	NA ⁴⁹	89.3	NA	
			NA		NA		NA		
5	NA		Rate	Target	Rate	Target	Rate	Target	
			89.6	75.0	84.2	75.0	83.8	75.0	
			n=201		n=196		n=185		

Goal 1: In SY 2022 – 23, Howard University Middle PCS did not meet the goal target or improve from its prior year's performance in any of the three measures. In SY 2023 – 24, Howard University Middle PCS met this goal by improving from its prior year's performance in all three measures.

Goal 2: In SY 2022 – 23 and SY 2023 – 24, Howard University Middle PCS met this goal by improving from its prior year performance in two of three measures.

Goal 3: In SY 2022 – 23, Howard University Middle PCS did not meet this goal, as it did not meet the goal target or improve from its prior year's performance. In SY 2023 – 24, the school met this goal by improving from its prior year's performance.

Goal 4: In SY 2022 – 23, Howard University Middle PCS met this goal by improving from its prior year's performance. In SY 2023 – 24, DC PCSB was unable to determine whether Howard University Middle PCS met its ISA goal. OSSE ceased calculating and reporting state-level ISA data, so the goal target was unavailable. The school did not demonstrate improvement from its prior year's performance.

Goal 5: In SY 2022 – 23 and SY 2023 – 24, Howard University Middle PCS met this goal by exceeding the goal target.

⁴⁹ Beginning in SY 2022 – 23, the Office of the State Superintendent of Education (OSSE) ceased its calculation and reporting of state-level ISA data.

Pathway B (Transitional Goals) Performance

For schools serving grades 6 – 8, transitional goals measures include, to the extent available: proficiency on the Partnership for Assessment of Readiness for College and Careers (PARCC) assessment or the District of Columbia Comprehensive Assessments of Progress in Education (DC CAPE) in ELA and math, indicated by the percentage of students scoring 4 or higher;⁵⁰ ISA; and re-enrollment.

The chart below shows Howard University Middle PCS's performance on each applicable transitional goals measure in SY 2022 – 23 and SY 2023 – 24. (Per the *Charter Goals Policy*, DC PCSB uses SY 2021 – 22 school performance as a baseline to assess improvement in SY 2022 – 23.) The chart indicates whether the school's rate met the state or sector rate, and whether the school improved from its prior year performance.^{51, 52}

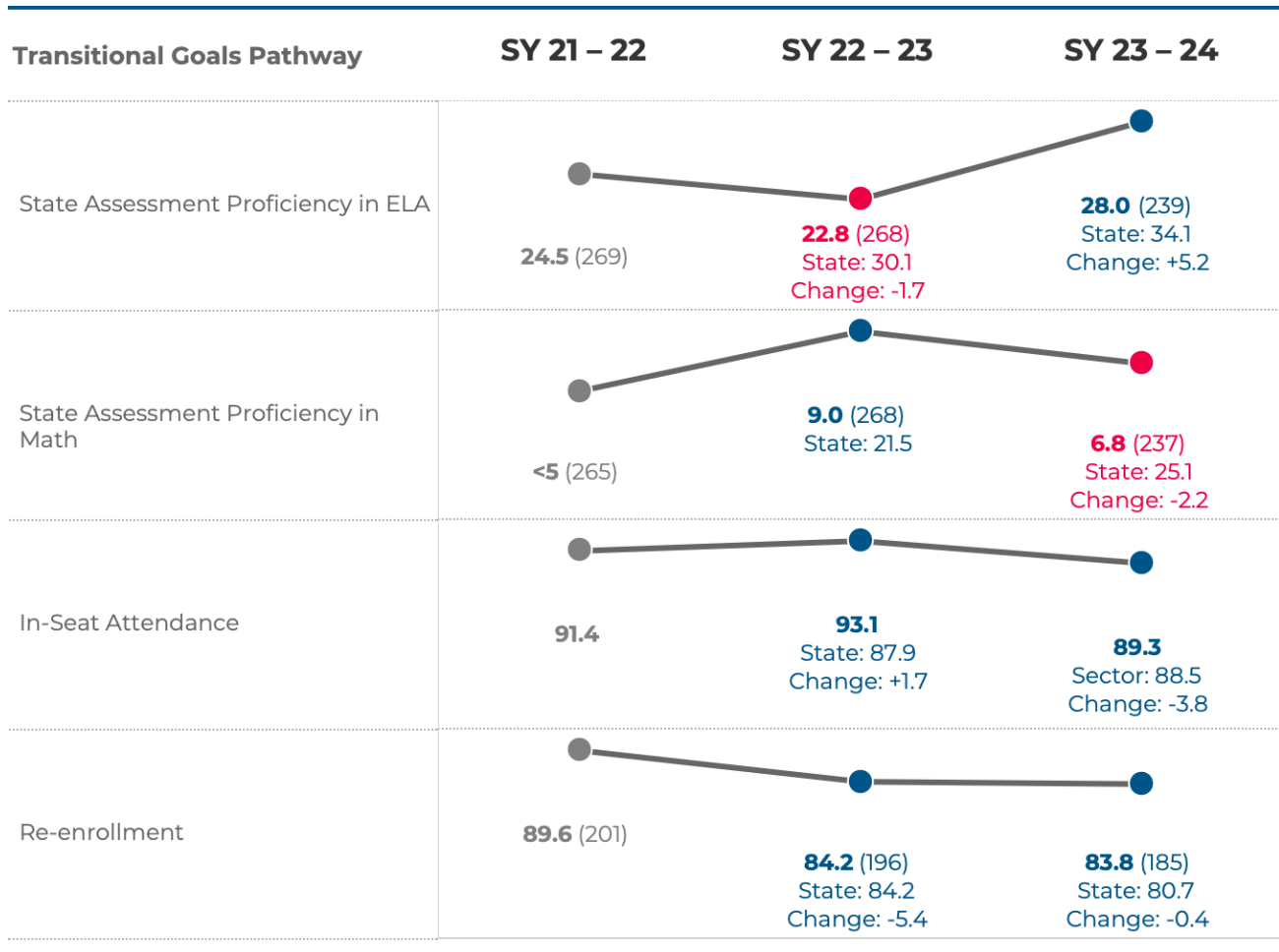
⁵⁰ A score of “4” or “5” on PARCC or DC CAPE indicates that students have met or exceeded expectations for their grade level.

⁵¹ Per the *Charter Goals Policy*, comparative state/sector rates are from the prior year state/sector data. That is, state/sector rates in the “SY 22 – 23” column represent state/sector rates from SY 2021 – 22; and state/sector rates in the “SY 23 – 24” column represent state/sector rates from SY 2022 – 23. DC PCSB uses state/sector rates from the prior school year as comparative rates so that school leaders have advance notice of the comparative rates.

⁵² State/sector rates for elementary and/or middle schools are based on PK – 8 inclusive data, excluding outliers. Rates are not grade-band specific.

Rate (n-size)

- Met state/sector rate or improved from prior year
- Did not meet state/sector rate and did not improve from prior year
- Not applicable or not assessed



Data Notes:

DS: Data suppressed (sample size less than 10) and is not evaluated.

<5: Rate is less than 5% and is not shown but is evaluated.

No Comp.: No comparative value (state or sector sample size less than 10).

All data labels are rounded to the nearest tenths. All color coding reflects non-rounded values.

In SY 2022 – 23, Howard University Middle PCS met or exceeded state performance or demonstrated improvement in three of four transitional goals measures: ISA, re-enrollment, and math state assessment proficiency. Howard University Middle PCS did not meet state performance, nor did it demonstrate improvement in ELA state assessment proficiency.

In SY 2023 – 24, Howard University Middle PCS met or exceeded state/sector performance or demonstrated improvement in three of four transitional goals measures: ISA, re-enrollment, and ELA state assessment proficiency. Howard University Middle PCS did not

meet state/sector performance, nor did it demonstrate improvement in math state assessment proficiency.

Pathway C (Growth) Performance

Howard University Middle PCS selected the NWEA MAP as its nationally normed growth assessment. The table below shows Howard University Middle PCS’s SY 2022 – 23 and SY 2023 – 24 NWEA MAP performance and the school’s SY 2023 – 24 DC CAPE growth performance.

SY22-23: Met publisher growth criteria or improved from prior year

SY23-24: Met publisher growth criteria

Rate (n-size)

SY22-23: Did not meet publisher growth criteria and did not improve from prior year

SY23-24: Did not meet publisher growth criteria

Not applicable or not assessed

Growth Pathway	SY 21 – 22	SY 22 – 23	SY 23 – 24
NWEA MAP: Reading	15.0 (273)	28.5 (272) CGP: 50.0	32.0 (241) CGP: 50.0
NWEA MAP: Math	17.0 (273)	18.0 (272) CGP: 50.0	35.0 (241) CGP: 50.0
State Assessment MGP: ELA			50.0 (232) MGP: 50.0
State Assessment MGP: Math			38.0 (231) MGP: 50.0

Data Notes:
 DS: Data suppressed (sample size less than 10) and is not evaluated.
 <5: Rate is less than 5% and is not shown but is evaluated.
 No Comp.: No comparative value (state or sector sample size less than 10).

In SY 2022 – 23, Howard University Middle PCS did not meet or exceed publisher growth criteria on the NWEA MAP in reading and math. The school improved its NWEA MAP growth rates in both reading and math from SY 2021 – 22 to SY 2022 – 23.

In SY 2023 – 24, Howard University Middle PCS did not meet or exceed publisher growth criteria on the NWEA MAP in reading and math. The school met the Median Growth Percentile (MGP) target for DC CAPE in ELA but did not meet it in math.

Pathway D (OSSE Accountability System) Performance

OSSE’s accountability system, the DC School Report Card, measures multiple aspects of school performance, including academic growth and achievement, college and career readiness, and school environment. The chart below shows Howard University Middle PCS’s summative scores for SY 2022 – 23 and SY 2023 – 24.

OSSE DC School Report Card Outcomes (Pathway D)		
Target Score	SY 2022 – 23 School Summative Score	SY 2023 – 24 School Summative Score
40.0	37.0	28.9

Additional Academic Information

Qualitative Site Review (QSR)

DC PCSB uses the QSR to evaluate the school’s environment and instructional quality. DC PCSB staff observes schools across two domains—classroom environment and instruction, as defined in the Charlotte Danielson *Framework for Teaching*.^{53,54} From December 4 – 15, 2023, DC PCSB staff conducted a QSR at Howard University Middle PCS in anticipation of this review.⁵⁵ As part of the QSR, DC PCSB also reviews ELA and math assignments. Evaluators analyze the assignments to determine the extent to which schools provide students access to grade-level, standards-based instruction.

Observation Findings

After conducting unannounced observations, the QSR team rated the classroom environment and instruction on the *Framework for Teaching* scale from one to four: “1” indicates “unsatisfactory” performance, “2” indicates “basic,” “3” indicates “proficient,” and “4” indicates “distinguished.”⁵⁶

The following table reports Howard University Middle PCS’s average domain ratings.

Howard University Middle PCS’s Average Domain Ratings		
Observed Program	Classroom Environment	Instruction
Overall	2.68	2.13
Special Education	2.25	1.88

⁵³ Danielson, Charlotte. *The Framework for Teaching: Evaluation Instrument*. Princeton, NJ: Danielson Group, 2013.

⁵⁴ During SY 2023 – 24 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.

⁵⁵ See Howard University Middle PCS QSR Report, Appendix X1.

⁵⁶ See pages 21 – 25 of the school’s QSR report in Appendix F for a detailed description of each performance level.

Overall, Howard University Middle PCS scored just below proficient in the classroom environment domain and just above basic in the instruction domain. QSR observers rated 68.2% of Howard University Middle PCS classrooms as “proficient” or “distinguished” in the classroom environment domain and 30.2% in the instruction domain.⁵⁷ In the classroom environment domain, observers noted teachers established and implemented successful standards of conduct in most observations. Across most classrooms, student behavior was generally appropriate, and teachers frequently circulated to monitor student behavior. Observers also noted that in some classrooms, students expended good effort to complete high-quality work. In other classrooms, teachers’ primary concern appeared to be completing the task. In the instruction domain, observers noted teachers modeled the tasks’ processes in most observations. Observers also noted that, in most classrooms, teachers asked questions that led down a single path of inquiry, limiting discussion opportunities.

On its special education observations, Howard University Middle PCS scored just above basic in the classroom environment and just below basic in instruction. Before the two-week observation window, Howard University Middle PCS completed a questionnaire about how it serves students with disabilities. Observers looked for evidence of the school’s articulated program. DC PCSB staff found the school implemented its stated special education program with fidelity. However, Howard University Middle PCS’s special education programming rated below basic in the instruction domain.

Howard University Middle PCS demonstrated concerning QSR performance, particularly in its overall and special education instruction domain scores. Given this concerning performance, DC PCSB may conduct an additional QSR at Howard University Middle PCS during the next five-year review period. Doing so will provide the school with multiple opportunities to engage with DC PCSB in an independent, qualitative assessment designed to support the campus in identifying its environmental and instructional strengths and weaknesses. It will also provide DC PCSB with greater evidence of school quality ahead of Howard University Middle PCS’s 25-year review.

Assignment Review Findings

In addition to conducting classroom observations, DC PCSB staff and The New Teacher Project (TNTP) consultants reviewed sample ELA and math assignments Howard University Middle PCS students received. Evaluators used TNTP’s *Assignment Review Protocol* in assessing whether the assignments: 1) aligned with grade-appropriate standards, 2)

⁵⁷ In SY 2022 – 23 and SY 2023 – 24, the average percentages of observed PK – 8 classrooms in the DC public charter sector rated “proficient” or “distinguished” were 77.8% in the classroom environment domain and 63.6% in the instruction domain.

provided students with meaningful practice opportunities, and 3) gave students an opportunity to connect academic standards to real-world issues.⁵⁸

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." See Howard University Middle PCS's assignment review ratings in the table below.

Howard University Middle PCS Assignment Review Ratings		
Overall Rating	ELA Assignments	Math Assignments
Sufficient	2	4
Minimal	0	1
No Opportunity	3	0

⁵⁸ See the protocol here: <https://bit.ly/3PfYLKH>.

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 2019 – 20, Howard University Middle 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, 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.⁶¹

Howard University Middle PCS Procurement Contract Compliance		
Fiscal Year (FY)	Reported Procurement Packages	Early Warning Notices
2020	2	0
2021	15	0
2022	8	0
2023	9	1
2024	9	0

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

⁵⁹ D.C. Code § 38-1802.12(a)(3).

⁶⁰ See Howard University Middle PCS's Compliance Review Reports, Appendices G1 – G5.

⁶¹ See the *Procurement Contract Submission and Conflict of Interest Policy* here: <https://bit.ly/4bNG2jK>.

compliance to ensure Howard University Middle 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 each LEA's EML data and practices. DC PCSB staff determines 1) whether public charter schools are compliant with local and federal laws pertaining to EML students and 2) whether the LEA's provision of services is equitable for EML students.⁶² Howard University Middle PCS did not require any DC PCSB enforcement actions or interventions pursuant to this policy during the review period.

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 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

Every year, OSSE analyzes each LEA's compliance with special education requirements and issues its findings in an annual determination report. In accordance with the U.S. Department of Education reporting requirements, OSSE makes annual determinations using eight applicable measures of IDEA compliance and student progress. Beginning with federal fiscal year (FFY) 2021, OSSE also launched its annual Special Education Performance Report (SEPR).^{67, 68} In SEPR, OSSE assesses performance using an expanded number of measures in two categories: LEA compliance and student progress.⁶⁹ The table below shows how IDEA annual determinations align with OSSE's SEPR levels.⁷⁰

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 H.

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

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 E.

⁶⁷ 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 2021 refers to July 1, 2021 – June 30, 2022.

⁶⁸ See the SEPRs for Howard University Middle PCS for FFY 2021 and FFY 2022, Appendices I1 – I2.

⁶⁹ In the SEPR, LEA Compliance comprises 35 points of the total score earned, and Student Progress comprises 65 points of the total score earned.

⁷⁰ See Appendix J1 for more detail about LEA performance and OSSE's enforcement actions for each IDEA annual determination and SEPR score level.

Percentage of Points from Applicable Measures ⁷¹	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

Howard University Middle PCS's IDEA Annual Determinations and SEPR Levels

The table below shows Howard University Middle PCS's annual determinations across the review period.

FFY	Percentage of Points from Applicable Measures	IDEA Annual Determination
2019	100%	Meets Requirements
2020	100%	Meets Requirements
2021	93.5%	Meets Requirements
2022	78.9%	Needs Assistance

SEPR reports on 1) an LEA's capacity to serve students with disabilities and 2) key student progress measures. Howard University Middle PCS's SEPR for FFYs 2021 and 2022 in Appendices I1 and I2 provide specific information about the school's performance on each measure. The table below shows a summary of Howard University Middle PCS's SEPR results.⁷²

⁷¹ 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.)

⁷² For information about the DC public charter sector's SEPR performance in FFYs 2021 and 2022, see Appendix J2.

FFY	Performance Area	Points Earned	Percent of Points Earned	SEPR Level
2021	LEA Compliance	35 of 35	100%	Leading
	Student Progress	60.4 of 65	92.3%	
2022	LEA Compliance	28 of 35	80.0%	Strengthening
	Student Progress	43.9 of 65	67.5%	

Howard University Middle PCS received “Meets Requirements/Leading” designations in three of four FFYs, demonstrating satisfactory compliance with special education requirements.

OSSE Enforcement Actions

While Howard University Middle PCS received a “Needs Assistance/Strengthening” designation in its 2022 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 or more consecutive years.

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 the District’s laws and regulations regarding special education, including the identification, evaluation, educational placement of the student or the provision of a free appropriate public education (FAPE) to such child.

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 complaints. After each due process or state complaint hearing, OSSE issues a written hearing officer determination (HOD) or Letter of Decision (LOD) detailing its findings along with any actions the LEA must fulfill, if any. OSSE then oversees the timely implementation of actions required by HODs.

Howard University Middle PCS received one state complaint during the review period. In August 2023, a state complaint was filed alleging that the school failed to make special education and related services available. However, OSSE issued an LOD stating that no noncompliance was found, and the case was closed.

DC PCSB Audit and Monitoring Actions

According to the *Special Education Audit and Monitoring Policy*,⁷³ DC PCSB staff regularly reviews LEA data to determine whether public charter schools comply with local and

⁷³ See the *Special Education Audit and Monitoring Policy* here: <https://bit.ly/49U9wfr>.

federal laws regarding students with disabilities. Additionally, DC PCSB reviews policies and practices to ensure they advance equitable outcomes for students.

During the review period, DC PCSB staff flagged Howard University Middle PCS for low QSR performance in its special education program. See the chart below for more information on the audit resolution.

School Year	Audit Criteria	Type of Audit	Results
2023 – 24	Scored below basic in the instruction domain of the special education QSR	Desk Audit	Upon review of the requested documents, DC PCSB found significant gaps in instructional effectiveness and strategy development that likely affected general and special education staff. DC PCSB identified a lack of inclusive instructional strategies in the school's professional development offerings. DC PCSB staff required the school to submit a SY 2024 – 25 professional development calendar emphasizing differentiation and universal design. The school's updated calendar reflected DC PCSB staff's recommendations. DC PCSB will continue to monitor achievement and qualitative data to determine the application and effectiveness of the action.

SECTION THREE: FISCAL MANAGEMENT AND ECONOMIC VIABILITY⁷⁴

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.⁷⁵

Scope of Financial Review

DC PCSB holistically assessed Howard University Middle PCS's financial performance by 1) reviewing information received from or about the school and 2) engaging with the school regarding financial oversight matters. In performing its analyses, DC PCSB relies on the audited and unaudited financial statements and additional information provided by the school, and on assurances provided by independent Certified Public Accountants (CPAs) selected by the Auditor Review Committee.⁷⁶

DC PCSB examined the following financial reports and information:

- The school's audited financial statements from FY 2020 through FY 2023;
- The school's unaudited financial statements for FY 2024;
- The school's annual budget for FY 2025; and
- DC PCSB's Financial Analysis Report (FAR) of Howard University Middle PCS from FY 2020 through FY 2023 and supporting information.⁷⁷

Summary of Findings⁷⁸

Howard University Middle PCS demonstrated strong fiscal performance during the review period, except in FY 2024 when the school demonstrated satisfactory fiscal performance. DC PCSB's review of the LEA's audited and unaudited financial statements confirmed that 1) the school has not engaged in a pattern of nonadherence to GAAP, 2) the school has not engaged in a pattern of fiscal mismanagement, and 3) the school is economically viable.

Strengths and Weaknesses

- Except for the change in net assets margin that was below target in FY 2024, all the school's key financial indicators in the five-year period from FY 2020 through FY 2024

⁷⁴ Each percentage in Section Three of this report has been rounded to the nearest whole percentage.

⁷⁵ See D.C. Code § 38-1802.13(b).

⁷⁶ The Auditor Review Committee comprises representatives of DC PCSB, the Office of the Chief Financial Officer (OCFO), and OSSE.

⁷⁷ See Howard University Middle PCS's FAR Reports, Appendices K1 – K4.

⁷⁸ See Financial Definitions and Examples, Appendix L, for more information on financial terms and indicators used herein.

were above target, indicating strong financial performance, robust liquidity, and healthy sustainability.

- The school's annual audit reports for the period under review reflected unmodified opinions and no audit findings.

GAAP Adherence, Fiscal Mismanagement, and Economic Viability Analysis

Enrollment, Operations, and Facilities

The table and chart below detail some of Howard University Middle PCS's most significant performance and sustainability indicators and operating revenues and expenses per student from FY 2020 to FY 2024.⁷⁹

Key for Enrollment, Operations, and Facilities Metrics Table	
Comparison to FAR Benchmarks	What this means in the following table
Within target range	Generally strong financial position
Outside of target range	Possibly imminent financial concerns; operations may not be adequately managed, sustainable, or economically viable; closer monitoring warranted

⁷⁹ FY 2020 through FY 2023 numbers originate from audited financial statements. FY 2024 numbers originate from unaudited interim financial statements.

Howard University Middle PCS - Enrollment, Operations, and Facilities Metrics								
Financial Measure * Higher is better ** Lower is better	Audited				Unaudited		FY 2024	FY Trends
	2020	2021	2022	2023	2024	Median	Target	
Audited Enrollment	291	287	282	284	253	399		
Change in Net Assets Margin*	4%	14%	11%	7%	-2%	4%	>= 0%	
Primary Reserve Ratio*	0.4	0.6	0.6	0.6	0.6	0.6	>= 0.2	
Debt Ratio**	0.3	0.1	0.1	0.1	0.1	0.6	<= 0.5	
Occupancy Expenses as a % of Facilities Allowance**	124%	123%	127%	113%	117%	123%		

Audited Enrollment

The school's enrollment remained relatively stable from FY 2020 to FY 2023, fluctuating between 282 and 291 students. However, from FY 2023 to FY 2024, there was a decline of 31 students, or 11%. In FY 2025, enrollment partially recovered, increasing by 18 students, or 7%.

Change in Net Assets Margin, Primary Reserve Ratio, and Debt Ratio

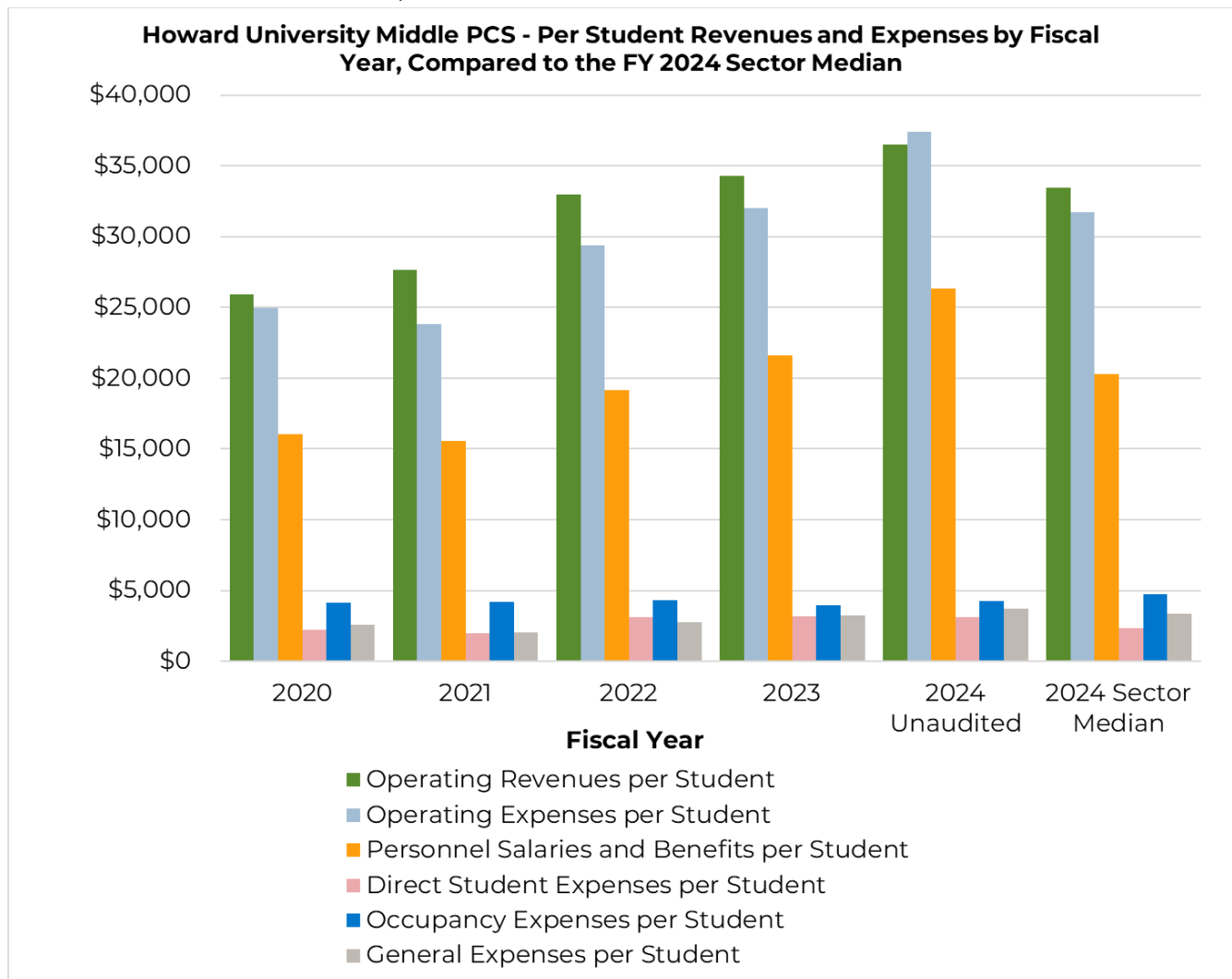
The school's change in net assets margin consistently exceeded the 0% target from FY 2020 through FY 2023, ranging from 4% to 14%, demonstrating strong financial health. However, between FY 2023 and FY 2024, the margin declined from 7% to -2%, largely due to a reduction in available Elementary and Secondary School Emergency Relief (ESSER) funding and a decrease in enrollment. In FY 2025 the school expects to achieve a 2% change in net assets margin based on the FY 2025 budget. In addition, the school maintained robust financial sustainability, as reflected in its consistently above-target primary reserve ratio, which increased from 0.4 at fiscal year-end (FYE) 2020 to 0.6 at FYE 2024. Additionally, the debt ratio decreased from 0.3 to 0.1 between FY 2020 and FY 2021, primarily due to the repayment of a \$0.7M Paycheck Protection Program loan and remained stable at 0.1 through FYE 2024.

Occupancy Expenses

The school operates and leases a facility located on the Howard University campus, receiving an annual in-kind rent donation of \$1.0M from the university. In FY 2026, the school plans to relocate to a new facility, also situated on the Howard University campus. The expected financial impact will be minimal as the cost of renovations for the new facility will be covered by Howard University. In addition, although the in-kind rent is expected to change, the school expects its entire rent to continue to be funded by Howard University.

From FY 2020 through FY 2024, occupancy expenses as a percentage of facilities allotments were closely aligned with the 111% to 132% sector medians, ranging from 113% to 127%. The fluctuations between FYs are primarily related to increases in the per pupil facilities allotments and changes in enrollment.

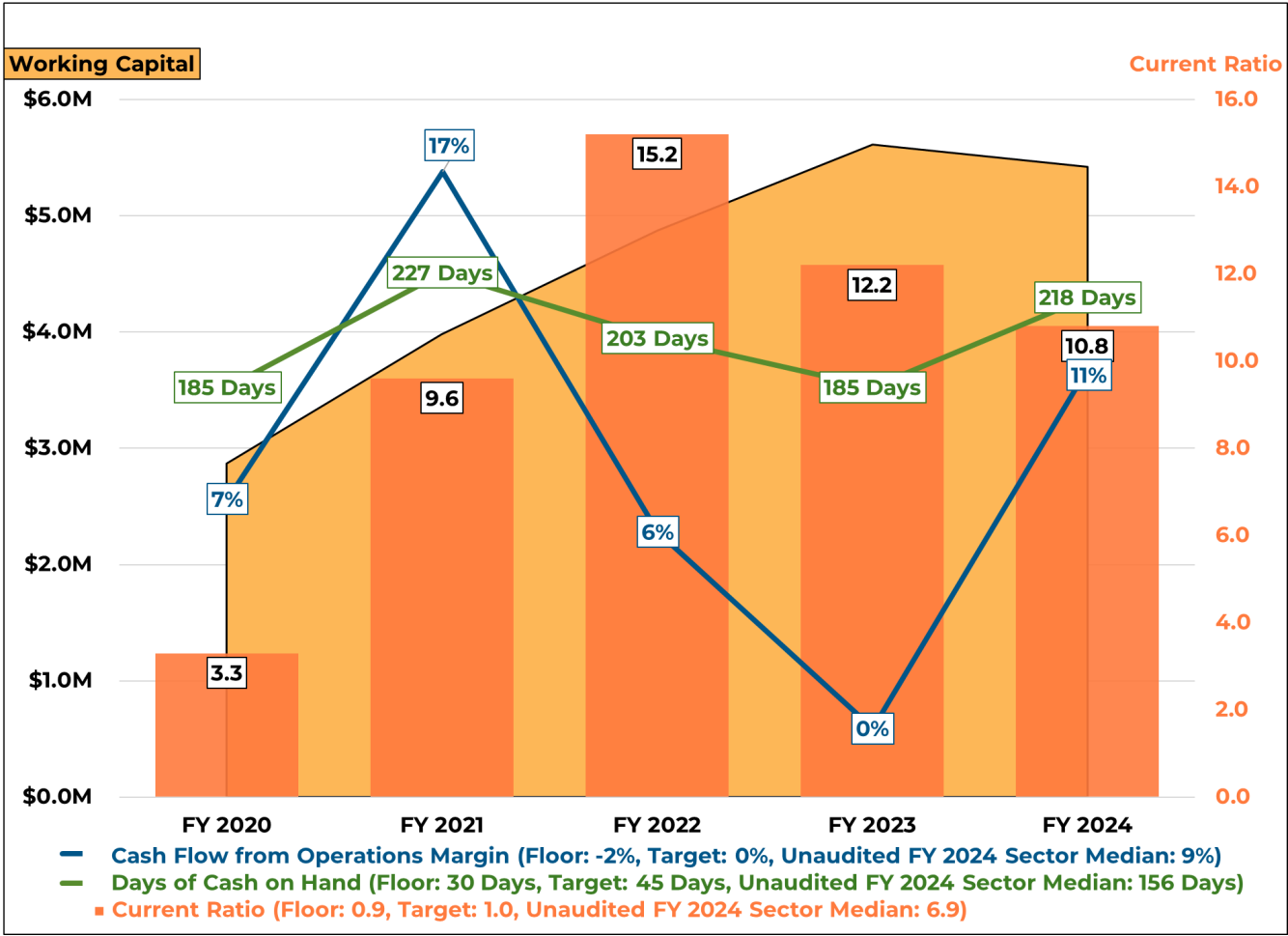
Per Student Revenue and Expenses



During the review period, the school’s operating revenue per student demonstrated consistent growth, while operating expenses per student followed a similar trend from FY 2021 to FY 2024. The school maintained a positive margin between operating revenues and expenses per student throughout most of the period. However, in FY 2024, operating expenses exceeded operating revenues per student primarily due to a reduction in available ESSER funding.

Liquidity

The chart below shows Howard University Middle PCS’s performance on key liquidity measures, including current ratio, working capital, days of cash on hand, and cash flow from operations margin.



The school reflected consistently above-target days of cash on hand from FY 2020 through FY 2024, ranging from 185 days to 227 days. From FY 2020 through FY 2024, the cash flow from operations margin fluctuated between 0% to 17%, always at or above target, primarily due to the timing of federal grant receivable collections. The cash flow from operations margin recovered in FY 2024 as the school collected its FYE 2023 federal grants receivable.

From FYE 2020 through FYE 2022, the school's current ratio fluctuated between 3.3 and 15.2 primarily due to the Paycheck Protection Program loan repayment in FY 2021 and the accounts payable and accrued expenses decrease at FYE 2022 and increase at FYE 2023 and FYE 2024. From FYE 2020 to FYE 2023, working capital steadily increased from \$2.9M to \$5.6M, dropping back to \$5.4M at FYE 2024.

Audit Reports

The school's annual independent auditor's reports for FY 2020 through FY 2024 reflected unmodified opinions and no audit findings on the school's financial reporting internal controls or Single Audits.