

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 (5 or 10 yrs)
- ☐ 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: Hannah Cousino, Director, School Performance Department

SUBJECT: Mergers and Acquisitions Policy

DATE: October 27, 2025

The DC Public Charter School Board (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. This request aligns with DC PCSB's Strategic Roadmap Priority of Excellent Schools.¹

Recommendation

DC PCSB staff recommends its Board open the proposed Mergers and Acquisitions (M&A) Policy for public comment from October 27, 2025 (after the public meeting) through November 17, 2025 at 5:30 pm. DC PCSB will consider any public comment received during the public comment period before the final vote.

Written comments may be submitted by mail or email to:

DC Public Charter School Board
100 M Street SE, Suite 400
Washington, DC 20003
public.comment@dcpcsb.org

¹ See the Strategic Roadmap here: <https://bit.ly/3EVeKYq>.

Anyone wishing to provide testimony before the Board may do so during the public hearing on November 17, 2025. The Board is scheduled to vote on the policy at the December 8, 2025 public meeting. More details will be posted on the DC PCSB website.

Proposal

DC PCSB staff seeks to establish a new policy for considering merger and acquisition requests (Attachment A). As population forecasts for school-age children decline and city conditions change,² DC PCSB must create the policies for thoughtful charter sector planning. This policy for mergers and acquisitions offers a set of pathways to support the sector's sustainability, efficiency, and quality.

Under the School Reform Act (SRA), the assets of a closing local education agency (LEA) or campus may be transferred to another LEA if that LEA agrees to enroll the closing school's students.³ Under the proposed policy, the transfer of assets may occur through a merger or an acquisition.⁴

With the M&A Policy, DC PCSB staff aims to:

1. Define mergers and acquisitions.
2. Set guiding principles to drive its evaluation of sector planning-related requests.⁵
3. Establish minimum eligibility criteria and a review process for three policy pathways: mergers, standard acquisitions, and emergency acquisitions.

Definitions⁶

A **merger** occurs when two independent LEAs, each operating under a separate charter, combine to form one LEA operating under a single charter, with the intent of maintaining some elements of each LEA's program.

In an **acquisition**, one LEA loses its charter through revocation, non-renewal, or voluntary relinquishment. In some cases, an LEA or DC PCSB may decide to close an individual campus but not the entire LEA. In either case, the LEA or campus's assets are then transferred to another LEA. The acquiring LEA must agree to enroll the closing LEA or campus' students and seek approval from DC PCSB for any charter amendments necessary to effectuate the acquisition. If the asset acquisition is limited to a campus, the transferring LEA must also amend its charter to remove authorization for the campus being acquired.

² See the DC Office of Planning's population forecasts here: <http://bit.ly/45gCGXc>.

³ DC Code § 38-1802.13a(d)(2)(A)(ii).

⁴ Note that the process by which a merger or acquisition occurs is mechanically the same, resulting in an asset transfer and dissolution of one active charter. However, mergers and acquisitions have distinct purposes that are reflected in this policy.

⁵ Sector planning amendment requests pertain to enrollment ceiling increases (ECI), new grades served, campus replications, mergers, standard acquisitions, and emergency acquisitions.

⁶ The policy assumes that two LEAs will be party to a merger or acquisition. However, DC PCSB will consider requests involving more than two LEAs so long as they meet the policy requirements.

Guiding Principles

DC PCSB will use the following guiding principles to drive its evaluation of sector planning-related amendment petitions.

- **Driving toward excellence.** LEAs must demonstrate a path toward excellence across a comprehensive review of academics, finance, and organizational effectiveness.
- **Need and demand.** LEAs must justify why a campus or program is needed and in demand, contributing to a diverse range of high-quality options.
- **Organizational capacity.** LEA and campus leadership must be strong and stable, and their governing boards must demonstrate the capacity to execute the request with fidelity.⁷

Policy Pathways

This policy is divided into three policy pathways, as follows.

- I. **Merger Policy** describes how two independent LEAs, each operating under a separate charter, combine to form one LEA operating under a single charter.
- II. **Standard Acquisition Policy** describes how an LEA may acquire another LEA that is not at immediate risk of charter relinquishment, revocation, or nonrenewal.
- III. **Emergency Acquisition Policy** describes how an LEA may acquire another LEA that is at an immediate risk of charter relinquishment, revocation, or nonrenewal. DC PCSB will only consider emergency acquisitions in extreme circumstances, as detailed in this section.

Each section describes that pathway's minimum eligibility criteria and review process. DC PCSB will use the most recently available data in its evaluation. For mergers and standard acquisitions, the review process comprises a notice of exploration, letter of intent, written application, public hearing, vote, and planning year. The notice of intent and planning year are not applicable to emergency acquisitions. DC PCSB may hold a capacity interview with the LEAs prior to the public hearing to ask questions and assess capacities.

Background

In spring 2024, DC PCSB began discussing the need for a comprehensive M&A Policy. While the DC public charter sector has experience with asset acquisitions

⁷ The National Association for Charter School Authorizers (NACSA) defines leadership capacities as the "knowledge, skills, abilities, and behaviors a team needs in order to develop and operate a quality school." NACSA explains how an authorizer can gather and evaluate evidence of these capacities here: <https://bit.ly/4hg5S4j>. DC PCSB will use this guidance or its successors to review merger or acquisition proposals.

following a school closure, there have been few, if any, examples of mergers or proactive acquisitions.

Beginning in January 2025, DC PCSB partnered with Bellwether through a grant from Education Forward DC to research national M&A practices; engage LEA leaders, city leaders; and other authorizers; and, and draft an initial policy.⁸ Bellwether has developed expertise in the policies and practices necessary for a M&A to be operationally successful and beneficial to students and families. Sixteen LEAs joined focus groups, 14 sector leaders participated in interviews, and three other authorizers shared their M&A experiences. Attachment B represents a summary of these findings. Attachment C shows how the policy responds to the initial LEA input.

In summer and fall 2025, DC PCSB staff conducted an additional round of external engagement. Staff convened a working group to provide feedback on the policy, distributed a draft across the sector, and presented at DC PCSB's Policy Summit on October 16, 2025.

Attachment(s) to this Proposal

Attachment A: M&A Policy

Attachment B: Bellwether's Summary of M&A Findings

Attachment C: LEA Input for the M&A Policy

Date: _____

DC PCSB Action: ____Approved ____Approved with Changes ____Rejected

Changes to the Original Proposal:

⁸ Learn more about Bellwether at <http://bit.ly/4mW35Pe> and Education Forward DC at <https://bit.ly/4qxIwgf>.