



POLICY TITLE	School Expansion Policy
ADOPTION/EFFECTIVE DATE	October 31, 2010 July 3, 2012 March 23, 2015 June 25, 2018
MOST RECENTLY UPDATED	February 23, 2026

PURPOSE

The DC Public Charter School Board (DC PCSB) strives to ensure every DC student receives a quality education. As population forecasts for school-age children decline and city conditions change,¹ DC PCSB must create the policies for responsible charter sector planning. This policy for school expansion aims to increase student access to high-performing schools while promoting sustainable growth in the sector.

Pursuant to the School Reform Act, a local education agency (LEA) must submit a petition to revise its charter. This policy explains the process by which DC PCSB will review charter amendment petitions pertaining to enrollment ceiling increases (ECI), grades served, and replications.

School expansions are difficult to execute effectively and have citywide impact. Accordingly, this policy establishes a high bar for approving expansion requests, thereby limiting growth opportunities to schools demonstrating capacity to successfully implement the plan *and* sustain positive outcomes for students.

A. Connections to Other DC PCSB Policies

DC PCSB seeks to establish consistent and transparent practices for approving, monitoring, and evaluating schools. As such, the *School Expansion Policy* connects to several other policies and guidance. First, the *Annual School Performance Index Report and Evaluation Policy and Technical Guide (ASPIRE Tech Guide)* states that DC PCSB will award high-performing schools with eligibility to replicate or expand their programs.² Schools that earn a Level 1 on ASPIRE are generally eligible to grow, whereas schools that earn a Level 2 may be eligible. Regardless of level

¹ See the DC Office of Planning's population forecasts here: <http://bit.ly/45gGCXc>.

² See the *ASPIRE Tech Guide* here: <https://bit.ly/3ZP1Bqj>. DC PCSB will adhere to this policy and its successors.



determination, all schools must apply for an expansion and will be evaluated under this policy.

Further, the expansion application deadline aligns with the *Charter Agreement Amendment Petition Submission Policy*.³ Also, the term “replication” incorporates language from the *Definition of School, Campus, and Facility Policy*.⁴

Finally, the *School Expansion Policy*, the *School Reorganization Policy*,⁵ and the *Charter Application Guidelines* comprise DC PCSB’s suite of sector planning policies and guidance.⁶ These items interconnect to provide the framework for responsible sector growth and consolidation. They share elements like guiding principles, a multi-stage evaluation process, and a Standard for Approval.

B. Definitions

An **ECI** amendment increases the number of students an LEA may receive funding for through the Uniform Per Student Funding Formula (UPSFF) as established in the maximum enrollment schedule in its charter agreement.

An amendment to the **grades served** changes the grades an LEA may provide instruction to in accordance with the maximum enrollment schedule in its charter agreement.

A **replication** amendment seeks to operate an additional campus within an LEA by replicating an existing campus. Per DC PCSB’s *Definition of School, Campus, and Facility Policy*, a campus “operates a distinct grade range with a single school leader responsible for the academic program for the entire grade span of the campus.”⁷ Each campus has its own goals and academic achievement expectations (charter goals). Further, each campus receives its own accountability report.⁸

³ See the *Charter Agreement Amendment Petition Submission Policy* here: <https://bit.ly/3MnSDRz>.

⁴ See DC PCSB’s *Definition of School, Campus, and Facility Policy* here: <https://bit.ly/3rUbWaQ>.

⁵ The proposed policy can be found here: <https://bit.ly/46qFyjJ>.

⁶ The 2025 Charter Application Guidelines can be found here: <https://bit.ly/3X9vRkD>. DC PCSB will release the 2026 guidelines next month.

⁷ See footnote 5.

⁸ DC PCSB will amend the standard for review for determining charter goal attainment in the expanded LEA’s charter. Following the first year of operation, DC PCSB will evaluate expanded campuses using the relevant ASPIRE framework(s); new campuses will receive a score but no level. DC PCSB will adhere to the *ASPIRE Tech Guide*, the *Charter Goals Policy*, and their successor policies. See the current *Charter Goals Policy* here: <https://bit.ly/3xOVLBz>.



C. Guiding Principles

DC PCSB will use the following guiding principles to drive its evaluation of petitions for ECI, grade expansions, and replications, mergers, acquisitions, and new schools.

- **Driving toward excellence.** LEAs must demonstrate a path toward excellence across a comprehensive evaluation 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.⁹
- **Organizational capacity.** LEA and campus leadership must be strong and stable. A school's governing board must demonstrate the capacity to execute the request with fidelity.¹⁰

POLICY

The following section describes the minimum eligibility criteria and evaluation process for LEAs seeking to expand. This process comprises a notice of exploration, letter of intent, written application, public hearing, vote, and planning year. DC PCSB may hold a capacity interview with an LEAs prior to the public hearing to ask questions about the application and assess its leadership capacities to operate the proposed school.¹¹

A. Minimum Eligibility Criteria

An LEA must meet each of the following criteria to be eligible for expansion.

⁹ In alignment with the National Association for Charter School Authorizers (NACSA), DC PCSB defines need as “students’ access to quality schools, including unique/relevant models, strong outcomes, and other programmatic elements a community may seek.” Demand is “the intention of a sufficient number of students to enroll so that the school will meet its enrollment targets.” See NACSA’s definitions on page 9 here: <https://bit.ly/4aiPf6k>.

¹⁰ 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 expansion proposals.

¹¹ In a capacity interview, DC PCSB staff and Board members will pose a series of questions to the school(s) over a 90-minute period. There may be a challenge scenario in which the team must respond to a relevant issue impacting operations. Schools are encouraged to bring staff and board members with the collective expertise to represent the proposed plan. See page 7 for reasons why DC PCSB may hold a capacity interview.

1. **Performance:** The LEA must meet performance criteria based on the applicable DC PCSB academic accountability system for at least two of the immediately preceding three school years.¹² For multi-campus LEAs, at least two-thirds of campuses must meet the relevant performance standard.¹³ For single-campus LEAs evaluated under multiple academic accountability frameworks, at least two-thirds of applicable framework results must meet the performance standard.
 - a. LEAs evaluated using the Pre-kindergarten (PK)-Only, PK-8, High School, or Adult Education ASPIRE framework must demonstrate exemplary or strong performance by earning a Level 1 or 2 designation.
 - b. LEAs evaluated using the Alternative Accountability Framework (AAF) must fully meet their charter goals.
2. **Finance:** The LEA must, at a minimum, meet key financial indicator expectations, as reflected in the last Financial Analysis Report (FAR) or more recent statements.¹⁴
3. **Charter Review:** The LEA must have received its most recent charter review or renewal without high-stakes conditions for continuance or being placed on probation.¹⁵
4. **Conservative Growth:** The planned expansion adds no more than three grade levels and 175 students per year.¹⁶

¹² In the event that DC PCSB does not calculate ASPIRE levels or scores, DC PCSB will evaluate performance data for each measure against state, sector, or publisher rates, where applicable. DC PCSB will publish guidance in these instances. Also, DC PCSB will adhere to any successor accountability system.

¹³ In its calculations, DC PCSB will exclude campuses without at least two years of data to meet the relevant performance standard. For LEAs evaluated using the ASPIRE framework, all included campuses must have two years of level designations. DC PCSB will consider the holistic performance of the LEA, including data from these excluded campuses, in its final evaluation of an expansion request.

¹⁴ Prior to the adoption of a finance policy, DC PCSB will evaluate the school's days of cash on hand, current ratio, and primary reserve ratio to determine if this criterion is met. DC PCSB will establish key financial indicator expectations in future policy. DC PCSB will adhere to this policy and its successors to evaluate financial health.

¹⁵ High-stakes conditions are defined as conditions that, if not met, would result in LEA charter revocation, non-renewal, or campus closure.

¹⁶ DC PCSB will waive this criterion for mergers and acquisitions.



B. *Notice of Exploration*

An LEA seeking an expansion may submit an optional notice of exploration to DC PCSB to indicate initial interest, facilitate early discussions, and support planning. Submission does not constitute a formal application or commitment.

C. *Letter of Intent*

If an LEA meets the minimum eligibility criteria to pursue an expansion, then it must submit a letter of intent no later than **February 1** of the school year before the proposed expansion's planning year.¹⁷ A letter of intent must be signed by the LEA's leader and board chair and include at least:

- A description of the expansion type (i.e., ECI, grades served, replication) and the growth trajectory.
- A clear rationale for why the LEA is pursuing an expansion and how it will maintain or strengthen student outcomes.
- Evidence of how the expansion is responsive to the need and demand demonstrated by sector planning data and a market analysis.
- An attestation that the LEA meets the minimum criteria for an expansion.
- Evidence that the LEA has sufficient capacity, including financial and organizational capacity, to successfully execute an expansion.

DC PCSB staff will confirm that the LEA meets the minimum eligibility criteria and review the letter. In consultation with a subcommittee of the Board, staff will determine one of two outcomes within three weeks of receiving the letter:

1. **No Objections to Proceeding:** The LEA may proceed with developing the relevant expansion application for approval. DC PCSB reserves the discretion to evaluate whether the rationale is sufficiently compelling, supported by market analysis, and informed by real-time sector and citywide circumstances. As part of this assessment, DC PCSB may identify areas of concern or questions that must be addressed in the final submission. DC

¹⁷ For example, if an LEA submits a letter of intent by April 1, 2027, then, if approved, it will be effective no earlier than school year (SY) 2028 – 29. For SY 2026 – 27, DC PCSB will not require a letter of intent prior to application submission.

PCSB's written response to the LEA will include these considerations. "No Objections to Proceeding" does not indicate that an expansion request will ultimately be approved.

2. **Objections to Proceeding:** DC PCSB does not recommend that the LEA proceed with developing the relevant expansion application at this time. Any future request should address DC PCSB's objections.

D. Standard for Approval

Should an LEA proceed with a formal application, then DC PCSB will evaluate the request against the following Standard for Approval. To be considered for approval, the LEA must meet, at a minimum, the standard "Need and Demand."

1. **Need and Demand:** The LEA's proposed expansion responds to community need for its relevant model and strong student outcomes. The LEA will likely meet its enrollment targets. To inform this case for demand, the LEA addresses DC PCSB's most recent demand analysis and provides concrete evidence from interested families or adult students. Based on the expansion request, data may include, but are not limited to, enrollment trends, re-enrollment or persistence rates, population forecasts, intent-to-enroll forms, and objective market research. For ECI requests, DC PCSB will consider the proximity between audited enrollment and the existing ceiling in its decision-making. In the context of all sector-planning related requests, staff determines that the city can sustain the expanded school.
2. **Sufficient Progress in Developing the Plan:** The LEA demonstrates sufficient progress in planning for a high-quality expansion. It has engaged families, adult students (if applicable), staff, community members, and elected officials in the planning process. The LEA realistically assesses the challenges it will face in operating an expanded school, and it clearly describes how it will address those challenges. Other examples of sufficient progress include but are not limited to selecting curricula, revising the staffing plan, and presenting a balanced, conservative budget that reflects all necessary outlays.
3. **Consistency of Mission:** The LEA's mission, vision, and key design elements are consistent throughlines in the proposed expansion; responsive to the communities the school seeks to serve; and grounded in sound research, proven practice, and/or other reasons demonstrating likely effectiveness.

4. **Inclusiveness:** Each element of the expansion is deliberately designed to be inclusive of all students, including students with disabilities, emerging multilingual learners, and economically disadvantaged students. Over time, the LEA has delivered strong outcomes for all students, as evidenced by student group performance on accountability measures, special education compliance rates, classroom observations, and other monitoring activities.
5. **Leadership Capacity:** The leadership team, which comprises the head of school, board, and other identified key personnel, demonstrates the capacities, commitment, and track record to execute a successful expansion. There is stability at the LEA and campus leadership levels. The board has been actively engaged in the planning process. For campus replications, the LEA has identified a new school leader for the new campus.

E. *Application and Evaluation*

Applicants must submit the relevant expansion application no later than **June 1** one year before the start of the school year in which the proposed changes will be implemented.¹⁸ At least 30 business days before the public hearing, DC PCSB staff will notify impacted Advisory Neighborhood Commissions (ANCs) and open the request for public comment. Before the public hearing, DC PCSB staff may conduct a capacity interview to further assess the plan and the founding team's ability to execute it. Factors DC PCSB will consider include, but are not limited to, multi-campus growth or campus replication, recent leadership or board turnover, and significant changes to existing operational or financial plans.¹⁹ A school may also request a capacity interview. At a public hearing, the public may provide testimony, and the applicant will discuss the request with the Board.

From its review of the written application, capacity interview (if held), public hearing, and the applicant's past performance, DC PCSB staff will produce a final evaluation and make a recommendation to the Board, as described below. At a subsequent public meeting, the Board will vote to approve the request, approve with conditions, or deny.²⁰

¹⁸ For SY 2025 – 26, DC PCSB will extend this deadline to July 1, 2026. Approved expansions will be effective at the earliest for SY 2027 – 28.

¹⁹ The minimum eligibility assessment of the school may change over the evaluation process. In these instances, DC PCSB will consider the most recent data in its decision-making.

²⁰ Applicants can expect the process from application submission to Board vote to last three – four months. DC PCSB will adhere to the *ANC Notification Policy* and its successor policies. See the policy here: <https://bit.ly/3LtVTBI>.

Recommendation	Evaluation
Approval	The applicant meets each of the standards for approval.
Approval with conditions	<p>The applicant meets, at a minimum, the standard “Need and Demand,” and it misses no more than one additional standard for approval. Factors staff will consider include, but are not limited to:</p> <ul style="list-style-type: none"> ● The severity and scope of the missed standard can be addressed through a condition. ● The applicant’s response to resolving the issue(s) shows deep prior knowledge and understanding. ● The city can sustain this expansion within the context of all other requests received.
Denial	The applicant has not met, at a minimum, the standard “Need and Demand,” or it meets this standard but misses one or more additional standards. After considering the preceding factors, staff determines the missed standard cannot be resolved at this time.

An approved LEA will have at least one planning year before the expansion takes effect. During this time, the LEA will, as needed, update their participation in the common lottery, secure a facility, recruit students and staff, and implement other facets of their expansion plans. Conditionally approved LEAs must also address the missed standard. DC PCSB will meet with applicants during the planning year to discuss progress and provide technical assistance. Denied applicants may address the identified deficiencies in a future reapplication.

Expansion approval is time-bound. The school must secure a facility (if necessary) and begin enrolling students within 36 months of the Board’s vote. Failure to do so will result in the approval expiring unless extended by a Board vote.

Board Approval Acknowledged by:

DC PCSB Board Chair



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POLICY TITLE: Enrollment Ceiling Increase Policy	
ADOPTION/EFFECTIVE DATE: October 31, 2010 July 3, 2012 (Revised) March 23, 2015 (Revised)	MOST RECENTLY UPDATED: June 25, 2018

POLICY

Every year, the DC Public Charter School Board (DC PCSB) will consider school applications for enrollment ceiling increases (ECI). Schools with prior performance that meet the criteria listed below will generally be approved for the increase. For ECI requests that are very small in size (e.g., fewer than 10 students or less than a 5% increase of total enrollment size), the Board may use discretion in waiving some of the criteria below. The Board may also use discretion for school takeovers. In these cases, the LEA must meet criteria for campuses with grades served which are the same as the grades of the school which will be taken over.

New to this policy is a change in timeline. Previously, DC PCSB encouraged schools to find a facility and then apply for an increase. This is revised. Schools may now apply for and receive an enrollment ceiling increase prior to securing a facility. However, enrollment ceiling increases are now time-bound and the school must secure a facility and begin enrolling students within 36 months of the Board's vote. Failure to secure a facility within that timeframe will result in the ceiling increase expiring unless extended by a vote of the Board.

All schools that wish to be considered for an enrollment ceiling increase must demonstrate the following:

A. Performance:

- i. Tier 1 for single campus local education agencies (LEAs) with a single Performance Management Framework (PMF) that use the PK-8 or HS PMF²¹
- ii. Tier 1 for adult education schools
- iii. For multiple campus LEAs or campuses with two PMFs under the PK-8 and/or HS framework(s): Tier 1 on at least 2/3 of campuses, AND an overall PMF average of 50% or more over the past three years, AND no campus can be below 45%
- iv. For Alternative Accountability schools: meet 100% of academic charter goals (student achievement and student progress), AND

²¹ For Indicator A, the most recent PMF; goals assessment from the previous school year.

meet 100% of all school environment/ student engagement goals.

- B. A compelling case that there is demand for the expansion. The description of the scope, pace, and need for the enrollment ceiling increase reflects knowledge of the current demographic and growth projections of the city, found [here](#).²² Note that DC PCSB does not consider school financial issues as a need.
- C. Evidence that the school has engaged and responded to community stakeholders, including families and school staff. If a new facility has already been identified or the expansion will be accommodated in the school’s current facility, the school has demonstrated engagement with neighbors and any impacted advisory neighborhood commission (ANC).

If a school satisfies all three items above, the Board will review the application based on the indicators listed on the following pages. This chart outlines how staff will recommend to the Board:

Staff Recommendation	School Performance
Recommend Approval	The school meets items A-C and demonstrates achievement in all applicable indicators below
Consider Application and, pending analysis, recommend Approval with Conditions or Denial	<p>The school meets items A-C and misses no more than two applicable indicators below for PK-12, and no more than one for Adult and Alternative²³. Some factors that staff may consider when recommending approval with conditions are:</p> <ul style="list-style-type: none"> • Historical trend shows improvement (minimum three years) • The severity and scope of the missed indicator(s) are such that issues can be corrected prior to the enrollment ceiling going into effect (e.g. severity of outlier status, persistency of outlier status, number of students in cohort) • For subgroup assessment analysis, other assessment data available may be reviewed (e.g. WIDA, NWEA MAP, IEP goal mastery, etc.) • Lost Instruction Time due to Suspension Rate (for schools that miss the Suspension indicators) • School’s response to resolving the issue(s) shows deep prior knowledge and understanding of situation and school has already taken significant steps to improve

²² Analysis on Charter Programs, Need and Growth: <http://www.dcpsb.org/file/charter-programs-need-and-growth>.

²³ Adult and alternative schools have fewer indicators including subgroup assessment performance.

Staff Recommendation	School Performance
Recommend Denial	The school does not meet items A-C and/or misses more than two indicators below for PK-12 and more than one for Adult and Alternative

Indicators

- 1) In operation for at least three years; an LEA undergoing turnaround under its charter is not eligible for growth until after completing three years of operation after announcing turnaround. (Note: An LEA that acquires an LEA through an Asset Acquisition is exempt.)
- 2) School's audited enrollment²⁴ is at least 90% of their projected enrollment for the past two years
- 3) Re-enrollment rate (PMF rate and business rules when applicable):
 - i. At least 85% for single campuses grades PK-12
 - ii. At least 85% for multi-campus local education agencies (LEA), calculated as the average of all campuses' rates
 - iii. Persistence²⁵ rate of at least 75% for adult schools.
- 4) School's status on the most recent Financial Audit Review is not "Requires Additional Monitoring."
- 5) School has not been issued a Notice of Concern within the past 6 months.²⁶
- 6) No "not compliant" ratings on the most recent Compliance Review report.
- 7) If beyond year nine of operation, the school is fully accredited. If beyond year seven, the school is in the candidacy phase per the accreditation agency.
- 8) Subgroup performance/ growth for PK-12 schools²⁷:
 - For single campus LEAs, historically underperforming subgroups²⁸ must perform at or above the city average²⁹ on the state assessment for that subgroup OR have a median growth percentile (MGP³⁰) score at or above the city average

²⁴ Audited enrollment based off the final enrollment projection that the LEA and PCSB agree to in advance of the school year, which forms the basis for the Q1 payments to LEAs.

²⁵ Persistence is synonymous with retention for the purpose of this policy.

²⁶ From the date of the ECI charter amendment public hearing.

²⁷ Only applicable with a minimum of 25 test takers.

²⁸ Subgroups: Black Non-Hispanic; Hispanic/Latino; Economically Disadvantaged/At-Risk; SPED; and EL. These groups will be identified following OSSE's business rules.

²⁹ As measured by approaching expectations (3+) or meeting/ exceeding expectations (4+); this also applies to the subsequent bullet on multi-campus LEAs. If we do not have MGP at the city level for a given year, we will use the PARCC consortium data.

³⁰ MGP will be 1-year MGP, which is what OSSE publicly reports (and was historically used in Equity Reports, and in the future via the STAR Framework).

- for that subgroup³¹ For single-campus LEAs ending in grade 3 or below, score of at least 50 on the K-3 Growth Assessment for the “all students” category in both reading and math.
- For multiple campuses or campuses with two PMFs under the PK-8 and/or HS framework(s), at the LEA-level, historically underperforming subgroups must perform at or above the city average for that subgroup on the state assessment OR have an MGP score at or above the city average for that subgroup. For LEAS ending in grade 3 or below, with no campuses with an MGP, LEA average score of at least 50 on the K-3 Growth Assessment in both reading and math.
- 9) Rate of exclusionary discipline using out-of-school suspension for the following groups at each campus is not an outlier³² the previous school year, as defined by the interquartile formula³³:
- i. ALL students
 - ii. At-risk students
 - iii. Students with disabilities
- 10) Rate of exclusionary discipline using out-of-school suspension at the LEA level for at-risk students or students with disabilities is not triple the rate of their non-subgroup peers the previous school year (flag lifted if the rate is at or below the sector average for that subgroup).

Business Rules for the metrics in this policy can be found [here](#)³⁴.

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³¹ For the deep dive analysis in cases where the school missed this indicator, DC PCSB will look at historical student performance of students scoring levels 1-5.

³² Outlier categories are calculated by charter sector grade band and school type: PK-5, 6-8, 9-12, Alternative, and Adult. For the deep dive analysis in cases where the school missed this indicator, DC PCSB may look at school data compared to city averages.

³³ To calculate the IQR (75th percentile – 25th percentile): compute (25th percentile – (1.5 x IQR)) and (75th percentile + (1.5 x IQR)); anything outside this range (referred to as 1.5 x the Interquartile Range) is an outlier.

³⁴ Business Rules found at this link: <https://dcpcsb.egnyte.com/dl/Y6nAZqYxgk>