



**PREPARING FOR DC CHARTER SCHOOL
REVIEW & RENEWAL**

| A TOOLKIT |

***KNOWING IF
YOUR SCHOOL IS
IN DANGER AND
WHAT TO DO
ABOUT IT***

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Introduction

Charter schools are independently operated public schools that are governed by a board of trustees, are free to innovate outside school district mandates, and are held accountable for improved student performance by a charter authorizer. Innovation looks different depending on the school. But accountability is consistent across the DC charter sector.

The 1995 School Reform Act (SRA) outlines the accountability requirements charter schools must meet to remain open and serve students, and the DC Public Charter School Board (DC PCSB) is charged with overseeing those requirements. When a school is chartered by DC PCSB, it is granted a charter (entitling it to operate a public school), and the school's board of trustees enters into a charter agreement that lasts 15 years. The charter agreement details how the school shall operate and includes critical "goals and student academic achievement expectations" (hereafter referred to as "charter goals") it must meet to remain open. Goal attainment is the essential determinant of whether a charter school continues operations or is required to close at any time during its 15-year term.

DC PCSB monitors progress against charter goals over time, through two different processes: charter review and charter renewal. Charter schools by law are also required to comply with the terms of their charter and applicable laws and to meet the following basic financial standards: to comply with generally accepted accounting principles, to not engage in a pattern of fiscal mismanagement, and to remain economically viable.

For compliance and finance standards, DC PCSB monitors schools continuously, through school data and document submissions, receipt of community complaints, visits to schools, and collaboration with other government agencies, such as the Office of the State Superintendent of Education (OSSE). In addition to being continuously monitored, compliance and financial matters are assessed in DC PCSB's 5- and 10-Year Reviews and 15-Year Renewals.

Roles and Responsibilities. A school's charter is held by its governing board. Therefore, a school's board of trustees is ultimately responsible for ensuring that the school meets its charter obligations and that its students have access to an excellent education.

DC PCSB, an independent government agency of the District of Columbia, is responsible for oversight of all charter schools in Washington, DC, including closing schools that fail to meet the standards in their charter agreements. FOCUS is an independent, DC-based nonprofit that supports DC charter schools by advocating for and strengthening autonomy, equity, and quality.

Toolkit Objectives. The goal of this toolkit is to help the boards and school leaders of DC charter schools answer the following questions:

- What are the charter review and renewal processes?
- Is our school on track to achieve its charter goals as agreed to in the charter agreement?
- What are our options if our school is not on track and is in danger of being closed?

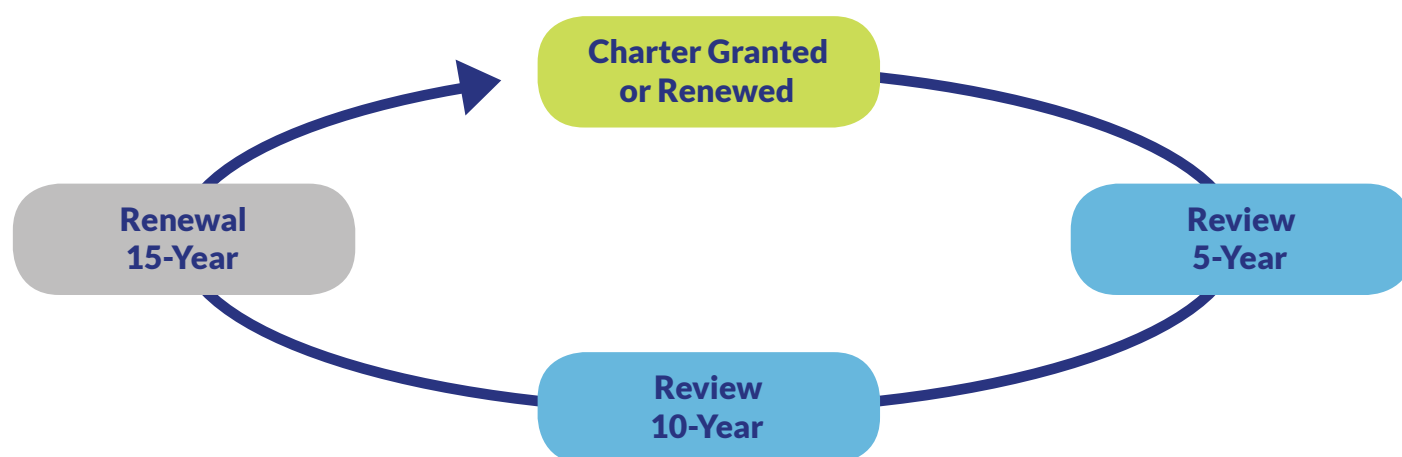
Note, this toolkit focuses on monitoring progress of goals and academic achievement as a school looks toward review and renewal. Consult DC PCSB if you need detailed information on financial or compliance requirements.

Audience and Timing. This toolkit is relevant for board members and leaders of schools at all performance levels and in each year of the charter. Leaders and boards should conduct annual examinations of organizational health and progress toward goals and legal requirements. Often, schools can avert crisis if they take action early. If they wait until the review or renewal cycle begins, it may be too late.

Policy vs Advice. While this toolkit was created through a partnership between FOCUS and DC PCSB, this should not be interpreted as official DC PCSB policy or guidance unless noted. Instead, this toolkit is meant to be a road map and discussion guide for how to approach these decisions, based on both FOCUS' and DC PCSB's experiences. There are parts of the toolkit where concrete advice from FOCUS or written policy from DC PCSB is called out explicitly, so readers can understand the difference between "ideas to consider" from FOCUS and actual policy from DC PCSB. Importantly, note that where text is marked as "FOCUS Tip," this text contains guidance solely from FOCUS and does not reflect the views of DC PCSB.

What Are the Charter Review and Renewal Processes?

The foundational bargain of the charter school concept is increased autonomy for increased accountability. To that end, the SRA requires DC PCSB to assess every school's academic performance, fiscal management, and legal compliance formally at least once every five years.



15-Year Charter Cycle

Charter schools launch with a 15-year agreement between the school's board and DC PCSB. DC PCSB monitors progress toward charter goals over time, through two different processes:

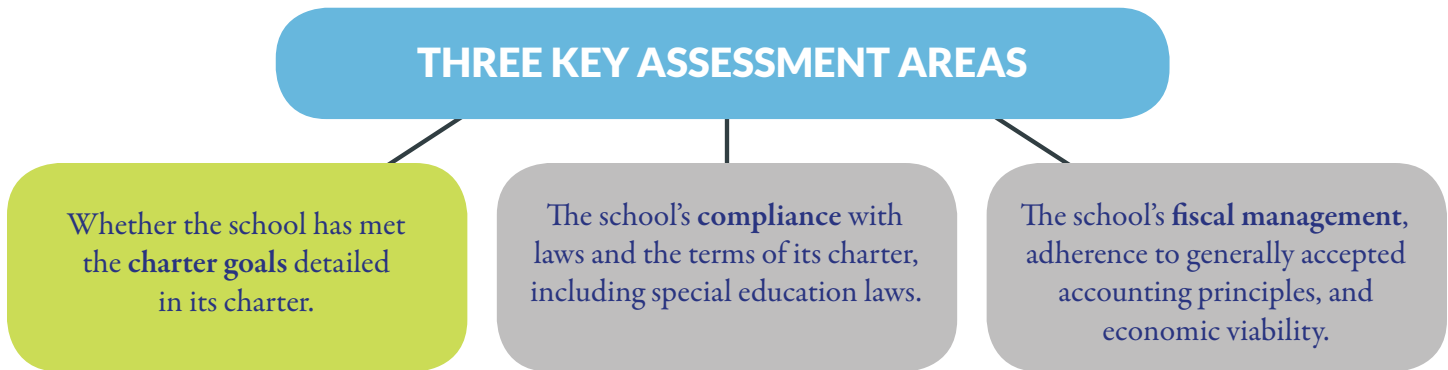
- Review at 5th and 10th years of school operation.¹
- Renewal at the 15th year of school operation.²

Appendix A shows when each current DC charter school is scheduled for review or renewal through the 2022 – 23 school year.

¹The law provides that DC PCSB must review a charter school “at least” every five years. DC PCSB has the discretion to conduct an “out of cycle” review at any time. This is rarely done, but could be triggered by serious safety, academic, or other issues at the school. It is also triggered by exceptionally low performance on DC PCSB’s Performance Management Framework, as described below.

²After a charter is renewed, the cycle begins again, with reviews at 20 and 25 years and a charter renewal at 30 years, and so on. There is no limit on how many times a charter may be renewed if it continues to meet the renewal criteria.

DC PCSB assesses schools on the same three key areas during both review and renewal:



This toolkit focuses on the first area: **charter goal attainment**. However, it is vital that school board members and leadership also carefully monitor the school's compliance and fiscal management and performance. Serious compliance issues or financial concerns may lead DC PCSB to revoke or not renew a charter. In fact, even outside the review and renewal process, DC PCSB is required by law to close a school that has not met the SRA's fiscal requirements. For more information on finance and compliance, see **Appendix B** or contact DC PCSB.

The review and renewal processes differ in three main ways.

1. **The law grants DC PCSB discretion at review but not renewal.** At a review, DC PCSB “may” revoke the school's charter if it has failed to meet its charter goals. At a renewal, DC PCSB “shall not” renew the charter if the school has not met its charter goals. In other words, DC PCSB is granted discretion in the law at 5- and 10-Year reviews but has no discretion at Year 15.³ This is also true for a school whose charter has already been renewed. In other words, at the 20- and 25-Year Reviews there is discretion, but not at Year 30. See relevant language from the School Reform Act in **Appendix C**.
2. **Schools apply for renewal, not review.** While DC PCSB staff will be in regular contact with the school's leadership before both a review and a renewal, a review is initiated by DC PCSB staff and does not require the school to apply. A renewal, in contrast, requires the school to submit an application for renewal according to a schedule provided by DC PCSB.
3. **The charter agreement is renegotiated after successful renewal, but not after successful review.** After a successful review, the school's charter and charter agreement generally continue unchanged. However, after a successful charter renewal, the school's charter agreement expires and must be renegotiated, generally up to the most current standard used by DC PCSB.

³DC PCSB has no discretion at either review or renewal if it finds that the school has violated the School Reform Act's financial requirements.



FOCUS TIP: Review vs. Renewal

- Be aware of the different legal standards that apply to review versus renewal decisions, and don't be confused by the distinctions.
- In all cases where there is some question about whether a school is meeting its charter goals, **discussions with DC PCSB should start early**, well before the review or renewal begins. Year 4 or Year 9 of operation is probably too late to make meaningful change or to convince DC PCSB that you have been paying attention. Timeframes for school turnaround are long and often catch school boards by surprise. A 5-Year Review only considers school results up through Year 4. If a school wishes to see improved results in Year 4, it generally needs to take aggressive actions beginning early in the third year of operation, so that the right staff and program(s) are in place at the start of Year 4. (See section below, "Deep Dive: Whole-School Turnaround.")
- **Don't assume because DC PCSB has discretion during reviews that you don't have to worry.** DC PCSB's goal is to ensure that all charter schools are high quality, and the first checkpoint occurs at the five-year mark. A school has four years to demonstrate that its model is effective. If the evidence isn't there at that point, the presumption is that the school should be closed. There is no "automatic extension."
- Moreover, **if DC PCSB does exercise its discretion, this often comes with significant conditions**, such as charter amendments, enrollment reductions, grade reductions, or strict improvement benchmarks that, if not met, lead to automatic closure.

5- and 10-Year Reviews

The process for the review is, in summary, as follows:

One year⁴ before review:

- School leaders have a **pre-review meeting** with DC PCSB to talk about the review process.
- DC PCSB conducts a **Qualitative Site Review (QSR)**. DC PCSB visits every school campus of the Local Education Agency (LEA) to observe the school's instructional program. DC PCSB issues a QSR report of its findings to the school.
- DC PCSB Board members meet with charter school board members for a "**Board-to-Board Meeting**" if the school or DC PCSB wants to discuss the review. (Board-to-Board Meetings are discussed in more detail later in this document.)

⁴ Years are school years. For example, if a school opens in fall of 2015, its 5-Year Review will be conducted in the 2019 – 20 school year, meaning a vote by the DC PCSB Board on the review could occur any time between October 2019 and May 2020. The events taking place "one year before" the review would occur in school year 2018 – 19.

Year of review:

- **DC PCSB provides a preliminary charter review report to the school.** This report includes an assessment of the school's academic performance, legal compliance, and fiscal management, and a recommendation to the DC PCSB Board regarding whether it should vote to continue the school's charter. The school is invited to respond to the report.
- **The DC PCSB Board votes whether to continue the school's charter or initiate charter revocation.**
- If the DC PCSB Board votes to initiate charter revocation, the school elects whether to request an informal hearing. If requested, DC PCSB holds the hearing, and several days later, the DC PCSB Board votes on whether to revoke the school's charter.

If the DC PCSB Board agrees that a school has met all of its charter goals, has complied with the law and the terms of its charter, and has satisfied the fiscal requirements of the SRA, the Board will vote to continue the school's charter.

If the DC PCSB Board finds that a school has missed even one of its goals, or has financial or compliance issues, the Board has the discretion to either:

- Initiate revocation of the school's charter,
- Continue the charter with conditions, or
- Continue the charter without conditions.

The decision in such a case is at the DC PCSB Board's sole discretion; however, the Board strives to be consistent in its treatment of schools. Historically, a significant factor that the Board has considered when determining whether to continue a school is whether the school has already undertaken a substantial turnaround effort and whether this effort is beginning to show results at the time of the Board's vote.

Other factors the DC PCSB Board has considered in the past include the academic trajectory of the school, the school's PMF results, the results of DC PCSB's school visits including its QSR results, the school's compliance results over time, outcomes for subgroups, the school's improvement plans already underway, and, less importantly, the school's articulated plans for improvement.

Multicampus schools at charter review:

In a multicampus school, each campus must meet the goals. Generally, however, if one or more campuses have failed to meet their goals, the DC PCSB Board may, at its discretion:

- Require closure of the campus or campuses that failed to meet their charter goals,
- Continue the charter with conditions, which may apply only to the campuses that failed to meet their goals or more broadly,
- Initiate revocation of the school's entire charter, or
- Continue the charter without conditions.

For more detail on the review process, see **Appendix D**.



FOCUS TIP: Can a school fight DC PCSB’s decision, and should it?

A school should seek legal advice at the first sign there may be trouble over its charter, and not wait until a vote to initiate revocation or until the school receives a recommendation of non-renewal from DC PCSB staff.

It is important to note that a vote to initiate charter revocation or a staff recommendation not to renew is not final. Before the final vote to revoke or not to renew a school’s charter, the school may present arguments to the DC PCSB Board as to why the school should not be closed.

The charter school board’s instinct is usually to “protect the school” and to try to remain in operation. This is natural and consistent with the idea of fiduciary obligation. However, when your school is not meeting its charter goals, it becomes necessary to consider student interests as separate from the school and to try to proceed in ways that are best for students.

Situations in which it could make sense to respond to the review or renewal report’s findings and recommendations include:

- You believe, with verifiable evidence, that DC PCSB has not followed its own policies.
- You have a dispute about the interpretation of data or business rules.
- You believe the school met goals when DC PCSB staff claims it did not.

Even in these situations, you are more likely to succeed if you engage in these disagreements with DC PCSB early, well before it comes to a vote.

15-Year Renewals

The process for the renewal is, in summary, as follows:

Any time during two years before the school’s charter expires:

- School leaders have a **pre-renewal meeting** with DC PCSB to talk about the renewal process.
- **DC PCSB conducts a QSR.** DC PCSB visits every school campus to observe its instructional program. DC PCSB issues a QSR report of its findings to the school.
- DC PCSB Board members meet with charter school board members for a “**Board-to-Board Meeting**” if the school or DC PCSB wants to discuss the renewal. (Board-to-Board Meetings are discussed in more detail later in this document.)

Fall of the 15th year of the school's operation:

- **The school submits an application for renewal.** The SRA requires a school to submit an application to renew its charter for an additional 15-year term. This application must contain information on the school's charter goals, finances, and governance.⁵
- **DC PCSB informs the school of its right** to an informal renewal hearing.
- **DC PCSB provides a preliminary charter renewal report** to the school.
- **The school elects whether to request an informal hearing,** and DC PCSB holds a hearing, if requested.
- **The DC PCSB Board votes whether to renew the school's charter.**

If the DC PCSB Board agrees that a school has met all of its charter goals, has complied with the law and its charter, and has satisfied the fiscal requirements of the SRA, it will vote to renew the school's charter. The vote to renew is conditioned upon the successful execution of a new charter agreement, as the old agreement will expire. A school may not open or receive funding without an executed charter agreement.

As described above, the law gives the DC PCSB Board no discretion at the 15-Year Renewal to allow a school to continue if it has not met its goals or if it has committed a material violation of applicable law or of its charter. Consequently, if the DC PCSB Board finds that a school has failed to meet its charter goals at the 15-year mark⁶, the Board will not renew its charter⁷.



FOCUS TIP: DC PCSB Hearings

When DC PCSB votes to revoke a charter, or not to renew a charter, the school has the right to an informal public hearing. The role of a public hearing is different depending on whether a school is up for a 15-Year Renewal or is going through a 5- or 10-Year Review.

In a review decision, a public hearing can be an opportunity to persuade DC PCSB to exercise its discretion and allow the school to remain open, perhaps with conditions. In this case, it is important for a school to carefully prepare for the public hearing.

In a renewal decision, if a school is not meeting its goals, the law requires DC PCSB to close the school. While the law also requires the opportunity for a hearing, a renewal hearing will not change the outcome of the decision unless the school can make a persuasive case that it is at least partially meeting all of its goals. It is important for school leaders, members of the school's board, and members of the school community to understand this reality.

⁵Each year, DC PCSB publishes Charter Renewal Guidelines that provide specific guidance around the renewal process, including the deadline for submitting the renewal application.

⁶The fiscal requirements of the SRA also apply at a charter renewal. As at review, the board is required to close the school if it finds these requirements have not been met.

⁷The law provides, at a 15-Year Renewal, for the option for the mayor to place the school on probation, thus allowing it to continue. Historically, mayors have been reluctant to do this and this provision has been used only once.

If a school's charter is renewed, "DC PCSB will work with the school to update its charter agreement for the next fifteen years, including updates to its goals and academic achievement expectations. Renewed charter agreements must be executed by the time the school's initial charter agreement expires to ensure the school receives its first quarterly payments on time."⁸

For more detail on charter renewal, see **Appendix E**.

Multicampus schools at charter renewal

The charter agreement for a multicampus school spells out how that school's goals will be assessed at review and renewal. Generally, if one or more campuses have failed to meet their charter goals, DC PCSB will be required to deny the renewal of the charter for the entire school. However, a possible alternative would be for the school to close the campuses that missed their goals and ask DC PCSB to reassess goal attainment without considering those campuses. (See the section "Deep Dive: Partial Turnaround + Partial Closure" below.)

Charter Revocation or Non-Renewal

To revoke a charter (at a review) or not renew a charter (at a 15-Year Renewal), the DC PCSB Board must follow a set of legally specified steps and timelines to ensure due process for the school. Specifically, the school will be notified of its right to have an informal hearing, which is usually held at a location decided by the school. The DC PCSB Board generally meets several days after the public hearing for a final vote on the matter. If the Board ultimately votes to revoke or not to renew a charter, the school has the right to seek judicial review of that decision by an appropriate court of the District of Columbia.

It can be instructive to examine schools that have been up for review or renewal over the past five years and whether they have been granted permission by DC PCSB to continue operations. See **Appendix F** for a summary of recent charter school renewal and review decisions.

The Role of the Performance Management Framework (PMF) in Review and Renewal

DC PCSB has adopted a policy, the "Elect to Adopt the PMF as Charter Goals Policy" (PMF as Goals Policy), that allows a school to set a certain result on the PMF as its charter goals. Under the current version of this policy, if a school adopts the PMF as its charter goals for one or more of its campuses, the average score over the review period must be 40% if at a 5-Year Review, 45% at a 10-Year Review, and 50% at renewal and every review thereafter under its new charter.⁹

The PMF as Goals Policy also provides that the Board may find that a school has met its goals under various circumstances, such as showing consistent improvement in overall PMF scores.

⁸ DC PCSB Charter Renewal Process FAQs, 8.17.18, page 3, dpcsb.org/sites/default/files/report/SY%202019-20%20Charter%20Renewal%20FAQs_0.pdf.

⁹ The specific language in a school's charter agreement language trumps the policy language. Note that not all charter agreements include the most recent policy language.

Schools that have adopted the PMF as their charter goals should closely consult with DC PCSB staff to understand under what conditions the DC PCSB Board would have the discretion to determine that the school's charter goals have been met even if the school has missed the strict numerical targets described in the previous paragraph. It is important to note that the DC PCSB Board has the discretion afforded under this policy at reviews and renewals to determine under certain circumstances that a school's charter goals have been met under certain conditions. If the Board determines that the school has not met its charter goals, at 5- and 10-Year Reviews, it has the further discretion to continue the school, failure to meet its charter goals notwithstanding. At 15-Year Renewals, the Board has no such discretion.

What is the Performance Management Framework (PMF)?

The PMF is a tool used by DC PCSB to assess, across common metrics, the performance of all public charter schools. There are four types of PMFs: Pre-kindergarten–8 PMF, High School PMF, Adult Education PMF, and Alternative Accountability Framework. All schools are measured annually using one or more of these frameworks, depending on the campuses they operate. The Alternative Accountability Framework uses unique measures, and no score or tier is produced. For all other PMFs, every campus is given a score of between 0 and 100 each year based on the campus' performance against about a dozen metrics, from attendance to growth and achievement on the state assessment. Campuses receiving a score of 65.0 or higher are labeled Tier 1 for that year, campuses with a score of 35.0 to 64.9 are Tier 2, and schools with a 34.9 or below are Tier 3.

The PMF can play an important role in a school's charter review/renewal process in two additional ways:

- If a school has not met its goals at 5 or 10 years and the DC PCSB Board is weighing whether to exercise its discretion to continue the school, the Board may consider a school's PMF results as one factor in its decision.
- The DC PCSB Board has a special policy for schools that score exceptionally poorly on the PMF, which may trigger an out-of-cycle review. In such cases, staff will generally recommend that the charter be revoked if such a review finds that even one of a school's charter goals have not been met, consistent with the SRA.¹⁰

Remember: A school does not have to be Tier 1 to have met its goals, and DC PCSB has closed many Tier 2 schools.

¹⁰ The DC PCSB PMF Policy and Technical Guide states:

Tier 3 PMF results that meet one or more of the following criteria may be subject to a high-stakes review as a Candidate for Charter Revocation to determine whether the school's charter should be revoked pursuant to the SRA.

- PK–8, HS, or AE PMF score of 20.0% or lower in the most recent year.
- PK–8, HS, or AE PMF score that is a 5.0% decrease or greater within Tier 3 from one year to the next.
- Any school performing in Tier 3 for any three of the previous five years.

Schools that are Candidates for Charter Revocation as a result of their Tier 3 status undergo a high-stakes review immediately to gather qualitative and quantitative evidence to determine whether the school has met its charter goals and is otherwise compliant with the SRA. Prior to the charter's expiration, the SRA gives DC PCSB discretion over whether or not to revoke a charter for failure to meet charter goals. In the case of Candidates for Charter Revocation, DC PCSB staff will generally recommend charter revocation if a school has failed to meet any of its charter goals.

Charter Goals

When considering review and renewal, it is important to have an in-depth understanding of the role of your school's charter goals. Charter school boards adopt their school's charter goals when they negotiate their initial charter agreement with DC PCSB, and again after they are approved for renewal. Schools may also amend their charter goals within certain timeframes, described below.

Charter goals are critical because they become the standard by which DC PCSB measures charter schools during high-stakes reviews. Schools are required to report progress toward achieving their goals each year in their annual reports.¹¹ However, boards and school leaders should be talking about their school's charter goals regularly—not just in the context of annual reports or review/renewal.

The SRA requires schools to adopt charter goals as outlined in the following DC PCSB Charter Application Guidelines:¹²

Charter Goals. Applicants have three choices when developing goals. Each of these choices may be made either for the entire school (generally organization and leadership goals), a specific campus (generally performance-related), or for specific grade spans within a campus (also performance related). The school may:

- Adopt the PMF as goals for all or some campuses;
- Adopt individualized (“mission-specific”) goals; or
- Adopt the PMF as goals and supplement this with additional mission-specific goals.

For more detail on charter goals, including guidance on setting your school's student academic achievement expectations, review the DC PCSB Charter Application Guidelines.

Amending your goals

When a school is failing to meet charter goals, it usually indicates that changes need to be made in the academic program or the execution of it. It is also possible that the initial goals were too ambitious or that there is a mismatch between the goals and the school's mission.

Be aware that you are allowed to amend your charter goals if you do it early enough. DC PCSB is open to schools seeking to amend their goals, but will insist that any goals meet the criteria listed earlier. DC PCSB is generally reluctant to amend goals to make them easier to attain unless an exceptionally compelling case can be made. Whenever you want to explore changing goals, contact DC PCSB to discuss changing expectations.

¹¹ Importantly, DC PCSB does not consider schools' self-reported progress against their charter goals to be determinative, and makes its own independent decision about goal attainment at the time of the school's review or renewal. DC PCSB publishing schools' annual reports does not imply agreement with a school's assessment of goal attainment.

¹² Visit the DC PCSB website to view the most recent DC PCSB Charter Application Guidelines, as these can change.



FOCUS TIP: PMF as Goals

There is an expectation that an older and more established school should perform better than a newer school. This drives the different targets in the PMF as Goals Policy. It also can mean that a newer school with slightly lower performance than a 15-year-old school could be allowed to continue while the charter of the older school was not renewed. Both the performance standards and the legal standards are different in these two situations.

Schools do not have to adopt the PMF as their goals. In the chartering process, schools should carefully evaluate which approach to goals aligns best with the school's mission and program.

FOCUS does not recommend that schools choose the option "Adopt the PMF as goals and supplement this with additional mission-specific goals." Adding a supplemental mission-specific goal can only hurt you in charter renewal and cannot offset weak performance on the PMF. Given that DC PCSB policy is that a school that is not meeting its goals at renewal cannot be renewed, falling short of a mission-specific goal could put your charter in jeopardy, even if you are performing well on the PMF.

If you are adopting the PMF as goals, save your mission-specific goals for internal accountability (goals the board sets for the school and school leader) and don't include them in your charter.

If you have a supplemental mission-specific goal and there is any chance that you will not be meeting it at your next review, consider amending your goals.

Schools may amend their goals until one year before the start of the school year in which they will undergo review, or until two years before the start of the school year in which they are up for renewal. Goal changes typically are not retroactive, so a school is measured based on its old goals until the goals are changed, and going forward based on its new goals. Because amending charter goals can take anywhere from three months to over a year, schools should start conversations with DC PCSB least 24 months before a review year or 36 months before a renewal year.

There is an exception, however, if a school is either adopting or updating to the latest version of the PMF as Goals Policy. In such cases, DC PCSB may allow the school to amend its goals closer to review/renewal, and the change in goals is retroactive. This option can be attractive to a school approaching or in a review or renewal year, if the school can calculate that based on its historic PMF scores it will meet the targets in the current PMF as Goals Policy. Another benefit is that there is no ambiguity in goal calculation and no data validation to be done, which is often a time-consuming and stressful experience for school staff, especially if data from three or five years ago are not readily available or the business rules are not clear. For more detail, see the DC PCSB Policy on Charter Amendments for Revised Goals and Academic Achievement Expectations.

For more information on goal-setting requirements, see [Appendix G](#).

When does it make sense to change your goals?

A school may have several reasons to change its goals, including the following:

- The goals are too ambitious and not achievable for any similar school (you must be prepared to provide evidence of the goal being unachievable).
- The goals do not reflect the school's priorities and areas of focus.
- The goals are impossible to measure, the school has not historically measured them appropriately or the assessment is no longer available, or the school does not have the student-level data needed to calculate goal attainment.
- The goals do not specify how they are to be measured, and adding clear business rules to the existing goals is necessary so that the school and DC PCSB understand how the goals will be measured at review/renewal.
- The school wants the simplicity and predictability of the PMF as its goals and DC PCSB managing the data and analysis.
- The school has an outdated version of the PMF as Goals Policy written into its charter agreement and wishes to adopt the most recent version.



FOCUS TIP: Changing Your Goals

DC PCSB guidelines for charter goals include an expectation that they be both ambitious and achievable. After setting your initial goals, you may find that they seem more ambitious than achievable.

This determination is somewhat subjective, and it may help to consult a third-party expert to assess the appropriateness of goals and develop alternative ones if needed. It will not be convincing if you just declare that your goals are too hard; this should be a data- and evidence-backed conclusion.

Example: You set certain goals around PARCC performance, but it turns out that you are enrolling many more students with disabilities than you anticipated, meaning 50% of your students have Individualized Education Plans. It might make sense to revisit your goals to better reflect your student population.

In this case, if the goal originally stated, “The percent of students scoring a 4 or 5 on PARCC English Language Arts (ELA) will exceed the citywide average,” you might change it to say, “The percent of students without disabilities scoring a 4 or 5 on PARCC ELA will exceed the citywide average for students without disabilities, and the percent of students with disabilities scoring a 4 or 5 on PARCC ELA will exceed the citywide average for students with disabilities.”



FOCUS TIP: Goal Setting

- Goal setting is mostly applicable to newly approved schools and schools that are approved for renewal, but it can also be relevant to any school considering whether to amend its goals.
- Take the goal-setting process very seriously. This is one of the most important decisions your school leader and board can make. Your full board and leadership should be engaged in defining your goals.
- Don't hesitate to involve outside experts. The charter agreement is a legal contract, and it is reasonable to seek legal representation when negotiating it. Setting charter goals is a very high-stakes decision. If you are adopting individual goals instead of the PMF, an expert in school performance evaluation may help you develop and present goals that will be acceptable to DC PCSB.
- Charter goals need to be both ambitious and achievable. Obviously, there is tension embedded in this requirement, and determining whether a goal fulfills it is subjective. As a school, you should focus on making sure your goals are achievable. DC PCSB will tend to push you toward goals that are ambitious. You can push back, and there should be a balance between ambitious and achievable. Assemble externally validated data to make a strong case for your definition of achievable. It is best to include data from similar schools or similar student populations when determining whether something is achievable. FOCUS recommends that schools adopt very ambitious goals internally to drive results, but make sure that any goal used for high-stakes external accountability leans toward achievable.
- Periodically review your goals to assess whether they are realistic and achievable. You should start to do this early in your first year of operation, when you begin to collect data on your student body. Were your assumptions about your students' entering skill levels accurate? How might that affect your ability to reach the goals you set initially?
- Initiate the amendment process early if you think you need to modify your goals. Schools can apply to adopt new goals up to one year before the start of a review year and up to two years before the start of a renewal year. Even if you are outside these timeframes, if you believe your goals are unreasonable, it may be worth discussing this with DC PCSB in the lead-up to a review. You definitely don't want to be complaining about your goals for the first time in a revocation hearing. This is also relevant if you want to keep your goals but amend the business rules used. DC PCSB strives to include detailed business rules in the charter agreement for calculating every goal so there are no surprises or disagreements. However, even with detailed business rules, there can be multiple interpretations. Assessment companies often change how they calculate scores, which can affect goal targets and attainment. It is important to address changes in assessments as soon as possible. It is best to discuss this with DC PCSB staff before a review and request to amend a charter goal if the business rules require changes.
- FOCUS is available to review goals or connect you with others who can provide feedback.

DC PCSB Policies and Resources Relevant to Review and Renewal

All DC PCSB policies and many other resources are available on the DC PCSB website, dcpcsb.org. Board members and school leaders should familiarize themselves with all DC PCSB policies. Policies and other resources relevant to this discussion could include:

- Charter Amendments for Revised Goals and Academic Achievement Expectations Policy
- Compliance reports (sent to full board annually in January/February)
- PMF as Goals Policy
- PMF Policy and Technical Guide (If you are a Tier 3 School, make sure to examine the provision on schools that are Tier 3 for three years.)
- Qualitative Site Reviews (often referred to as QSR)
- Review and Renewal Guidelines

Is My School on Track to Achieve Its Goals?

Boards and school leaders should be tracking progress toward charter goals each year to ensure that the school stays on course. Steps to identifying whether your school is on track for successful charter continuance (review) and renewal:

1. Identify your school's charter goals.
2. Measure progress toward goals every year.
3. Determine whether your school is on track to meet its goals.



FOCUS TIPS: Ensuring Board Members and School Leaders Understand the School's Goals

- Make sure the charter agreement, including all amendments, and charter goals are readily accessible to board members.
- Review and discuss charter goals as part of orientation/onboarding.
- Make sure the entire board is aware of the review/renewal calendar and when the school will have its next high-stakes review.
- Consider creating a board resource page on an internal drive where key documents can be easily accessed.
- Report regularly (at least annually) on the status of goals.
- Invite DC PCSB to a school board meeting to share its analysis of your school's progress toward goals.

Step 1: Identify Your School's Charter Goals

Your school's charter goals are detailed in the charter agreement itself, and posted on the DC PCSB website. If you amend your goals, DC PCSB and the school will execute a written charter agreement amendment to record these changes.

Remember—each campus is measured separately when it comes to goal attainment. Determine exactly how many campuses your school operates and track performance at each campus. (Sometimes a school operates multiple campuses at a single facility or a single campus across multiple facilities.)



FOCUS TIP: Identifying and Clarifying Your Goals

- If your school has adopted the PMF as its goals, you can **find your scores for each year and each campus in your school's School Quality Report on the DC PCSB website**. Calculating average PMF scores over the years is a matter of simple math.
- If your school has adopted goals other than the PMF, **each board member should know what those "individualized" goals are and how they are calculated**.
- **For individualized goals, be very clear about the business rules** that define how these mission-specific goals will be measured. Schools with recent charter agreements have the explicit business rules laid out in their charter, but some older charters do not. Consult early and closely with DC PCSB around business rules and, if necessary, amend your goals to include specific business rules. This is critically important. Goal attainment may be met or not met depending on a business rule about, say, whether non-tested students are counted in the denominator of a calculation
- Schools should seek **clarification from DC PCSB** as far in advance as possible if there is any ambiguity about charter goals.
- **Designate a board member responsible for understanding in depth the school's goals and tracking its goal attainment**.

Step 2: Measure Progress Toward Goals Every Year

Boards should be tracking their performance against five-year goals every year, with more emphasis beginning in Year 2 of the five-year period. Even new schools need to think about goals by Year 2 of their operations. Five years may seem far away when you are still ramping up with only your second class of students, but the school must be making quick progress toward its goals by that time to be on track.

This section walks boards and school leaders through the following questions:

- What data should we be looking at, and where do we find the data?
- When should we look at our school's progress toward goals?

- How should our school track progress toward goals?
- How will we know if DC PCSB is concerned about our progress toward goals?

What data should we be looking at, and where do we find the data?

The school leader and board should monitor progress toward charter goals and ensure that the school is performing at a level to pass high-stakes reviews. To do so, the board and school leader must know what data is most important, reliable, and accurate.

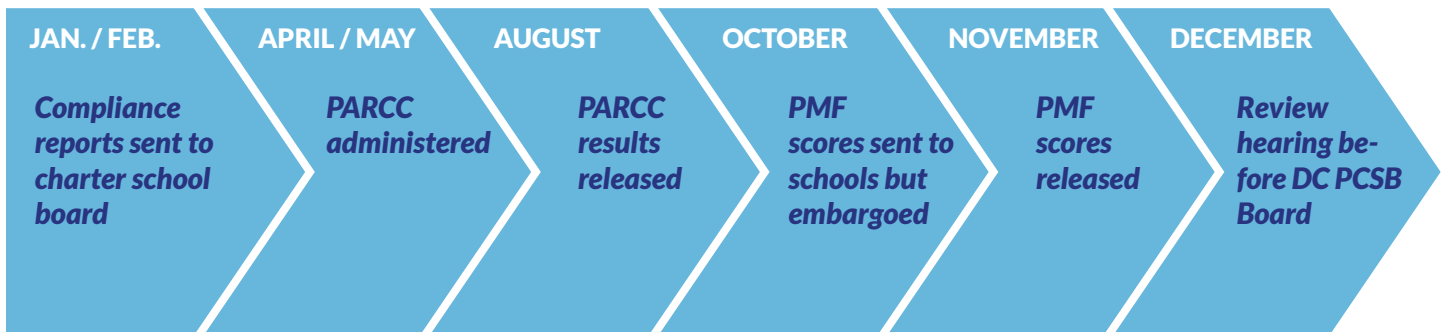
Generally, this data will be provided to the board by the school leader; however, much of it is also publicly available and can be readily accessed by any board member at any time. Some performance data that board members should be readily able to access includes:

- A school’s annual reports submitted to DC PCSB
- School Quality Report and data
- STAR Framework data and DC school report card
- Equity Reports
- Qualitative Site Review (QSR) report
- All communications from DC PCSB to the school’s board
- Community Complaint summaries (sent annually to the full board)
- Direct requests for information from DC PCSB

When should we look at our school’s progress toward goals?

Boards typically review progress toward charter goals at the end of each school year. This will allow the board to review data toward some goals, but not all data is available at the end of the fiscal year. Remember, the DC accountability framework relies on data that is released over many months. As you plan for your annual review of data and your 5-, 10-, or 15-Year high-stakes review/renewal, keep in mind the following sample schedule for data release.

Sample Annual Timing of Data Release



How should our school track progress toward goals?

School leaders typically lead the work of tracking progress on goals and create dashboards to help stakeholders—boards, staff, and families—understand where the school stands. These dashboards look different across campuses and can vary in detail and sophistication. The important determinant of a dashboard is whether stakeholders can easily understand if the school is on track to achieve its goals. Ideally the school leader is also providing additional context from other assessments, showing data by subgroup and grade level, sharing historical trends, etc. DC-based organizations such as FOCUS, Education Board Partners, and EmpowerK12 can serve as partners to help school leaders think about how to share data with boards. In addition, DC PCSB staff will share results of any assessment with board members at their request and support the board in reviewing/populating dashboards.

Consider the following example of a dashboard measuring progress toward long-term goals. Note, in this example, the school has adopted the PMF as its goals.

Example Dashboard Monitoring Progress to Goals

Dec. 2015: Successful 5-Year Review	PMF Score Nov. 2016 (for SY2015–16)	PMF Score Nov. 2017 (for SY2016–17)	PMF Score Nov. 2018 (for SY2017–18)	PMF Score Nov. 2019 (for SY2018–19)	PMF Score Nov. 2020 Last year of data before review	Is our school on track to achieve 45 on the PMF and have a successful 10-Year Review in Fall 2020? (Y/N) If not, what scores do you need to have each year to reach 45?
Campus A	58	59	61	67	TBD	Yes. Average is 61.3
Campus B	45	39	40	48	TBD	No. Average is 43. Need a 53 in Nov. 2020 to average 45 before review.

How will we know if DC PCSB is concerned about our progress toward goals?

DC PCSB is examining your school's data over time, just as you are. Often, if DC PCSB has significant concerns about your school's ability to meet your goals and be approved for your review or renewal, it will host a Board-to-Board Meeting. In this discussion, members of the DC PCSB Board and staff meet with members of the school's board and leadership. DC PCSB Board members will go on record sharing their concerns and follow up with a letter documenting those concerns. It is up to the school's board to oversee changes that will address the DC PCSB Board's concerns. It is important to note that, while DC PCSB will often reach out to a school if it is concerned about goal attainment, it is not required to do so.



FOCUS TIP: Board-to-Board Meetings

- **Take these meetings seriously.** Too often, school boards dismiss this early warning and do not hold the school leader accountable for making necessary changes to address DC PCSB concerns, often resulting in the school facing significant challenges in review or renewal. Then at the review hearings, the board members often say, “I had no idea it was this bad! Why didn’t you tell me?” But they did tell you—in a Board-to-Board Meeting.
- **Pay attention to all negative feedback.** Sometimes school staff and board members pay more attention to the positive feedback they might get during a QSR (“students seem engaged”) than the more negative observations, leading to a skewed interpretation of what DC PCSB is actually saying.
- **Show DC PCSB that your board is aware of the challenges.** If your board is aware of problems and already taking action to improve performance in concern areas, make that clear. Share minutes from prior meetings documenting the school's work on these challenges.
- If the Board-to-Board Meeting is **truly a wake-up call**, acknowledge it and get to the root of the problem. This situation generally means that the school leader either is not sharing accurate information with the board or is not taking performance problems seriously enough. Both explanations require decisive action.
- **All available board members should participate in the Board-to-Board Meeting.** Demonstrate to DC PCSB that all board members are engaged with the school and the work of the board, not just the school leader and board chair.
- **Show DC PCSB that your board members know your school.** Share personal experiences you have had with students and staff, demonstrating your understanding of the challenges and what it will take to achieve your goals.

Step 3: Determine Whether Your School Is on Track to Meet Its Goals

Now that you have a dashboard showing data compared with your upcoming review/renewal and more immediate annual goals, you can determine whether you are on track to meet those goals at each campus you operate. Review this data as a full board with your school leader.

Ask overall: “*Are we on track to achieve our goals and have a successful review/renewal process for each campus? What is the evidence that supports that assessment?*”

If the answer is “*Yes, we are on track to achieve our goals,*” then the board can continue its oversight, asking questions so that year after year the school stays on course to pass any review or renewal process.

If the answer is “*No, we are not on track to achieve our goals,*” then the board needs to identify the steps that will demonstrably shift student outcomes.



FOCUS TIP: Key Questions for Charter School Boards to Explore

When exploring whether you are on track to achieve your goals, ask key questions such as:

- Given our student achievement data and progress toward our goals at each campus and each grade band, **is it likely that we can meet these goals by the end of the review period?** What would it take? Have any other schools shown this much progress over this period? What did they do?
- **For the goals that we are on track to meet**, and for campuses that are on track to meet all of their goals, what strategies were successful in helping us get there? What key data trends are affecting our success? (Enrollment trends, strategic position, financial health, facility situation, compliance.)
- **For the goals we are not on track to meet**, and for campuses that are not on track to meet all of their goals, how far off are we and can we meet the score?

For schools with the PMF as their charter goals: Determine the score needed in the remaining year(s) to earn the average score (40, 45, or 50) required at review or renewal, and how attainable it is. It is rare for a school to achieve a PMF score significantly higher than what it has received in previous years, so ask probing questions if your leader is forecasting a steep jump in score. In cases where it is unlikely that the average score will be met, ask if the school is showing consistent annual improvement on overall PMF scores, as this may make the school eligible for the improvement provision in the PMF as Goals Policy.

continued on next page

For all schools not on track to meet its goals, determine whether:

- The goals will be met in some grade spans or at some campuses. If so, could the school be fiscally stable if it voluntarily closed lower performing grades or campuses?
- The school leader has the capacity and a plan for getting the school back on track. Ask questions such as “What is the capacity of our leadership? Does the school leader understand the seriousness of the situation? Has the school leader been forthright in bringing performance problems to our attention, or has this been a struggle? Does the school leader have promising ideas for turning the school around? Do they seem dramatic enough to change the performance trajectory (this is not a time for tweaking)? Do we believe he/she can execute these plans? Does he/she need additional resources to carry out these plans? Would we be better off hiring a consultant or exploring other operators?”
- The school has a plan for how to hold the school leader accountable for improvement. What interim benchmarks can indicate whether the school will meet its goals? When does the board decide that it is not feasible?
- The board is part of the problem. Ask questions such as “Have we as a board delivered on our promise to oversee a school that meets our charter goals? Are there board deficits that we need to address? Does the board have the capacity (time and expertise) to explore alternatives, or should we hire a consultant?”
- The board should hire an external, unbiased education data consultant to give a summation on whether you can make your goals.



FOCUS TIP: Warning Signs

Decisions about review and renewal should never take a school by surprise. Besides regularly comparing your data with goals, pay attention to what DC PCSB is communicating.

- Pre-review meeting: What is the tone?
- QSR report: Are there negative findings?
- Has DC PCSB asked for a Board-to-Board Meeting? This generally indicates concern.

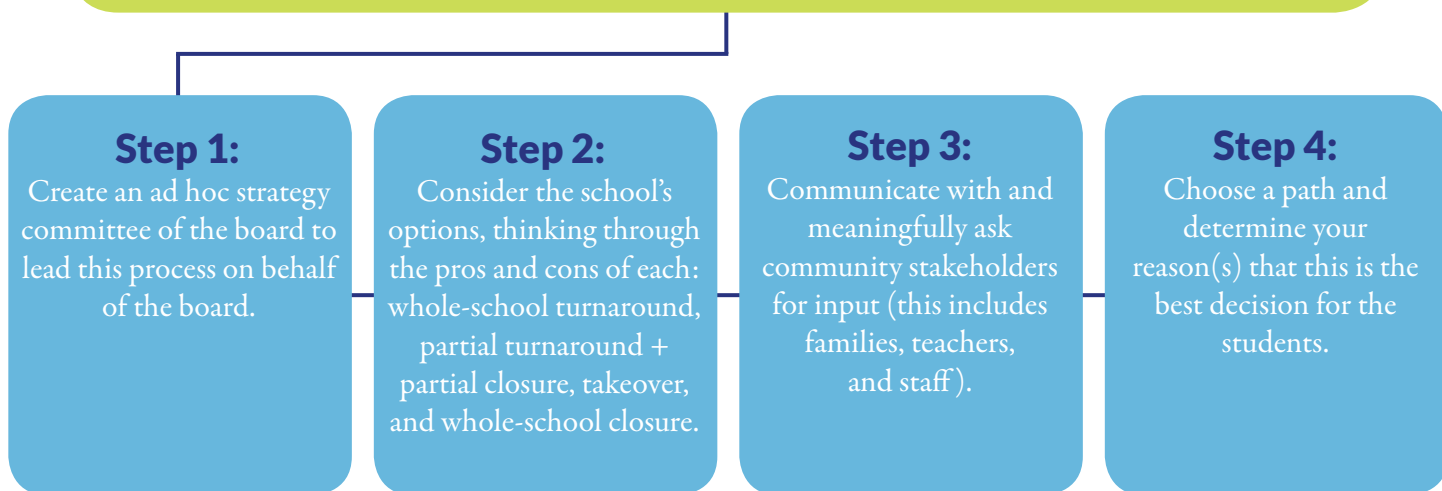
What Do we Do if Our School Is Not on Track to Meet Our Goals?

Exploring the Path Forward.

The most important role of the board is to ensure that the students in your school are receiving the high-quality education they deserve. Your north star is student learning—not your staff, your leader, or your emotions. The board’s most essential question must always be, “What is the best decision we can make for our students so they will reach their highest potential?” The guidance below is meant to be just that—guidance. Finding the right path forward for your students is a nuanced process that can change depending on the context of your school, and it requires flexibility and creativity. However, the steps below can serve as a framework to move through the decision-making process.

If the board and school leaders are not highly confident the school is on track to achieve review or renewal requirements, it is essential that the board take decisive action as soon as possible. Consider the steps for decision-making below:

STEPS FOR THE SCHOOL BOARD’S DECISION-MAKING PROCESS



Step 1: Create an Ad Hoc Strategy Committee to Lead this Process on Behalf of the Board

It is important for the charter school board to identify a formal structure by which to explore options and decide how to proceed. The board will need to do a significant amount of work in multiple areas—communication, family engagement, data analysis, outreach—and needs to make sure it is organized to do that successfully. Board members who have gone through this process have found it to be surprisingly consuming, feeling that they have added another full-time job to their already full plates. Manage the work by creating an ad hoc committee whose members can lead the board through this process.

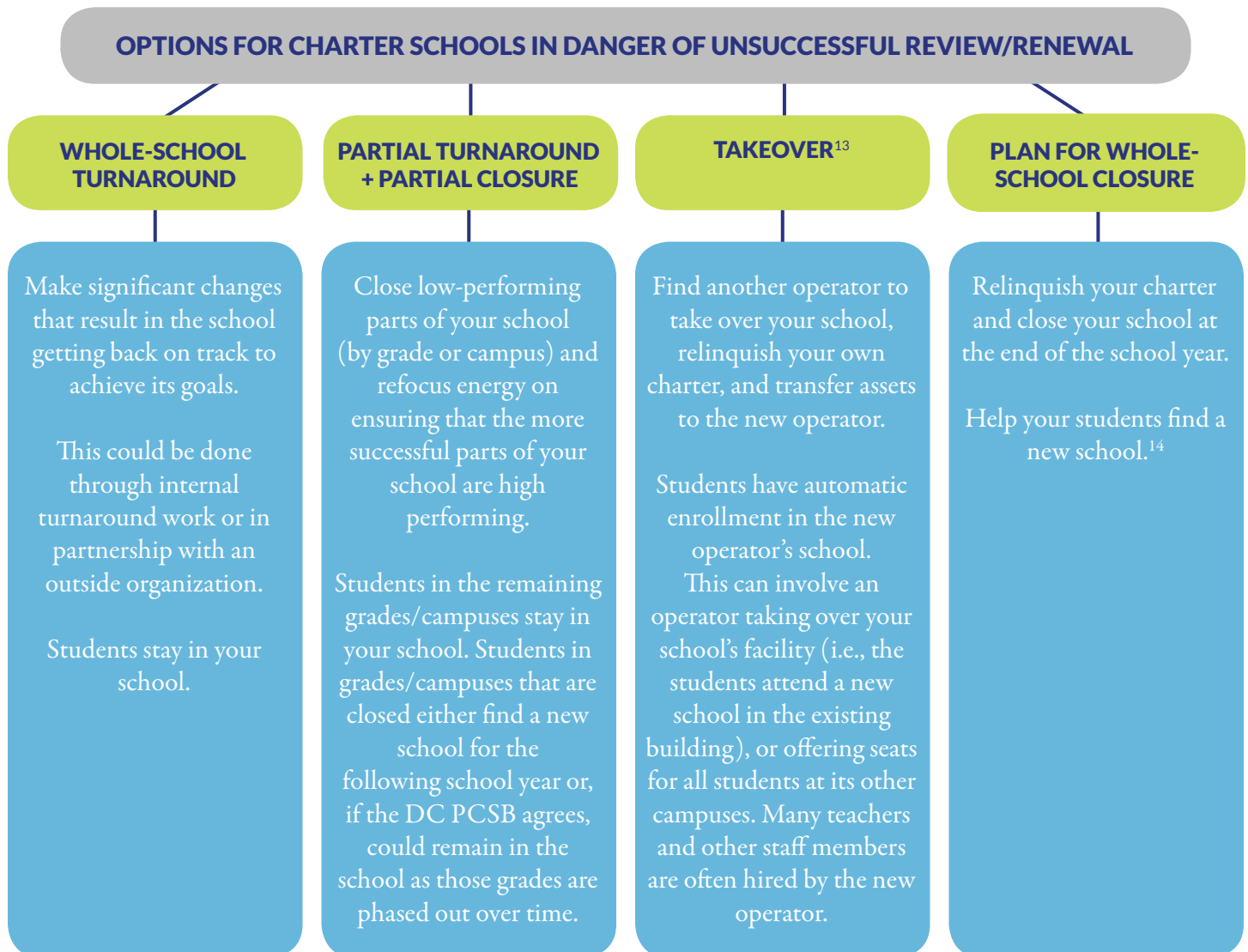
This committee should consist of board members who can commit the time to do a deep dive on the decision-making process. It should include the board chair and board members who have a diverse mix of skills and perspectives—community connections, academics, governance, finance, real estate, law, and communications. At least one parent board member should be on the committee. The committee may also include the CEO of the school, if appropriate. This CEO is driving the work at the school level; has a deep understanding of discussions happening at the student, staff, and community levels; and will be instrumental in ensuring a smooth transition.

The committee's charge is to lead the diligence and communications process on behalf of the board, updating the full board regularly on progress and findings. Ideally the chair of this committee is not the board chair, as that individual will have many additional roles to play in this process, such as communicating with DC PCSB. Make sure each committee member knows what parts of this process outlined below they are individually responsible for driving. This process is a lot of work and takes a lot of time; it cannot effectively be executed with only one person doing all the work.

The board should vote to create this ad hoc committee (ad hoc meaning it will dissolve when the committee's work is over) and document the committee's charge in a written job description. See **Appendix H** for a sample job description for such a committee.

Step 2: Consider the School’s Options: Whole-school Turnaround, Partial Turnaround + Partial Closure, Takeover by Another Operator, or Whole-School Closure.

There are four primary options for boards if they realize that their school is in jeopardy of not getting a continuance or renewal:



Note that the board may pursue a fifth option, which is to take no action and undergo the DC PCSB review/renewal process. Depending on the DC PCSB Board’s decision, the school’s board may then accept or contest the decision. As discussed above, the risk to this path is that if the DC PCSB Board votes to close your school, and you have no contingency plan or research in place, the charter school board must quickly scramble to identify whether there are any remaining options, e.g., takeover operators who would want to run your school.

¹³ A takeover is often referred to as an “asset acquisition,” as the new operator acquires the assets of the closing school.

¹⁴ See DC PCSB Closure Manual for more detail.

If the board does determine the best plan is to move through the DC PCSB review/renewal process, consider also exploring your contingency plan should the school, in fact, be closed.

To jump-start your board’s thinking about which path would be most beneficial for your students, engage in the self-study below. This self-study aims to initiate conversation. However, the best decision for students is not always immediately clear. This decision-making process requires nuance; input from teachers and staff, community, and families (and sometimes students); and exploration. To learn more about the options, consider the “Deep Dive” sections below.

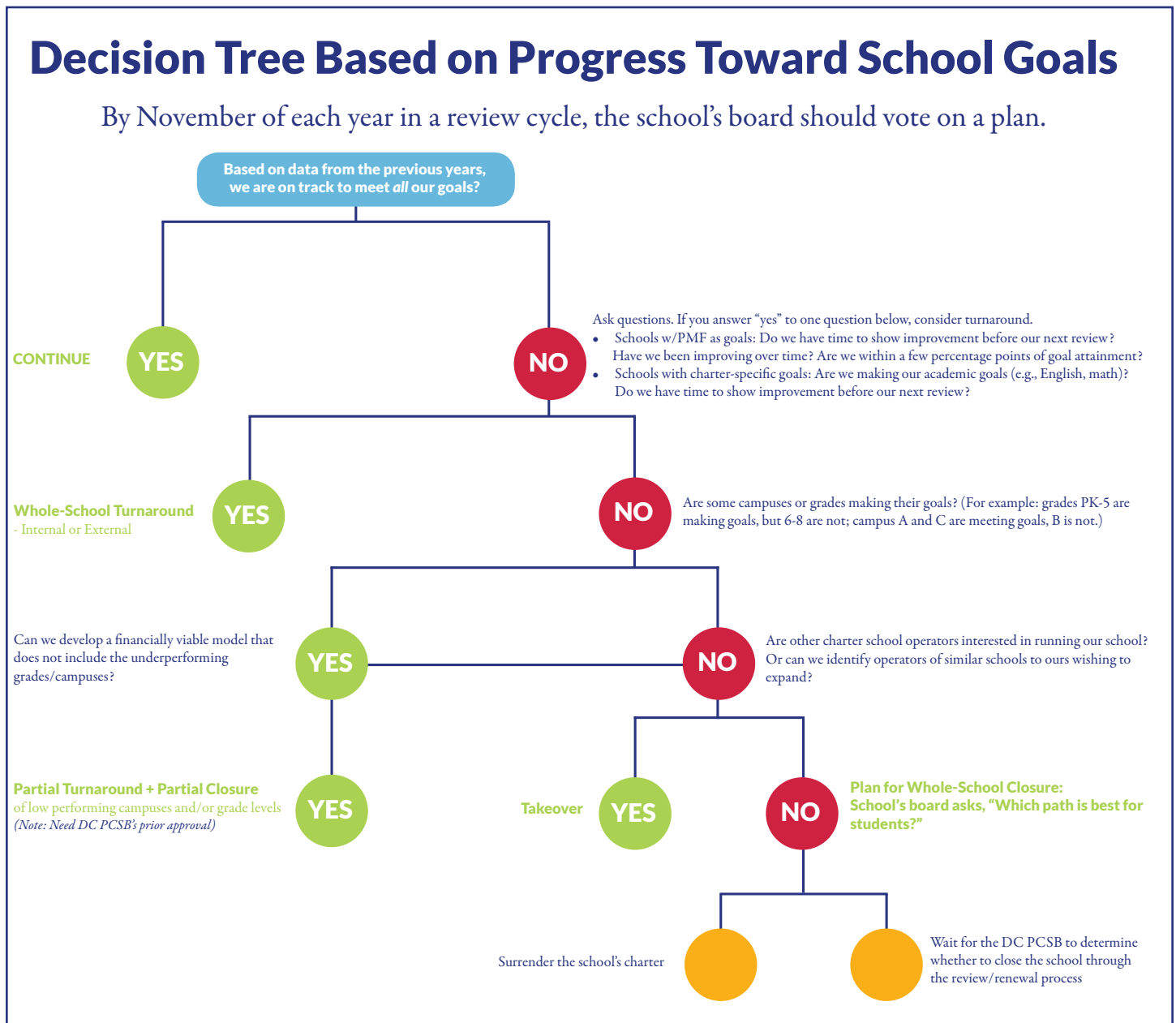
Self -Study: Evaluating Your School’s Options

Category to consider	Whole-School Turnaround	Partial Turnaround + Partial Closure	Takeover	Plan for Whole-School Closure
When this might be the right option	When you have time to make significant changes in the school that will result in (a) goal attainment either outright or through consistent, demonstrated improvement in student achievement results (applicable to schools that have an improvement provision in their goals), or (b) enough demonstrated improvement for DC PCSB to conditionally continue a school that has not met its goals.	When some grades or campuses are performing within range of the charter goals but other grade spans/campuses are not.	When you do not see a path to your school’s successful review/ renewal and your priority is to guarantee seats for your students in a new school. Assumes there is an operator interested in taking over your school.	When you see no viable path to serving students effectively, your financial model cannot work in the long term, there is no takeover operator willing to assume operations of your school, and it is too late for a turnaround or a turnaround is unlikely to be successful. In this case, schools must determine whether to voluntarily relinquish their charter early or wait for the DC PCSB review or renewal process to play out.
Timing	<p>School in Years 1, 2, or 3 of the five-year high-stakes review cycles.</p> <p>It is very difficult to see results from a turnaround after only one to two years of the process. If your school launches a serious turnaround effort at the beginning of Year 4, it could have promising results.</p> <p>However, this leaves little time to course correct if efforts are unsuccessful. What’s more, one year of promising data might not be enough to demonstrate promise to the DC PCSB Board sufficient to keep the school open. This is a gamble that a school might be willing to take.</p> <p>If you are well into Year 4 of your review cycle, it is generally too late for this option.</p>	Any time, but ideally announce plans to close particular grades or campuses before the My School DC lottery is launched (November) and absolutely before the My School DC Lottery deadline (Feb. 1 for high schools and March 1 for all other grades), so that students who need to find a new school have time to do so.	Any time, but ideally announce before the My School DC lottery is launched (November), and absolutely before the My School DC lottery deadline for families (Feb. 1 for high schools and March 1 for all other grades), so that students who do not wish to continue under the new school operator have time to find a new school.	<p>Any time, technically, but the timing of the decision and announcement of a school closure matters a lot.</p> <p>Try to announce a closure decision in November before the My School DC lottery system is finalized, and absolutely before the lottery application period ends (Feb. 1 for high schools, March 1 for everyone else), so that students have time to enter the lottery and find a new school. DC PCSB has changed its review and renewal cycles specifically to avoid making school closure decisions in the spring and summer. The boards of schools considering a voluntary closure should take timing very, very seriously.</p>

Category to consider	Whole-School Turnaround	Partial Turnaround + Partial Closure	Takeover	Plan for Whole-School Closure
Review vs. Renewal	Safer to try turnaround in a review cycle than renewal, as DC PCSB has more discretion in its decisions.	Option in either cycle.	Option in either cycle.	Option in either cycle.
Sustainability of Financial Model	Your school's financial model is sustainable in the long term. The school has the financial resources to reinvest in successful turnaround—led either internally or with an outside consultant.	Your school's financial model is sustainable in the long term—even with the loss of revenue that comes with losing students. The school has the financial resources to reinvest in strengthening the remaining programs—led either internally or with an outside consultant.	Could be a financially sustainable model as long as the acquiring school has the financial resources to invest in the changes needed to dramatically improve outcomes for students.	Your school's financial model is unsustainable in the long term and cannot be fixed by adjusting spending. For example, if a school does not serve enough students to sustain the financial needs of the school long term, closure could be the best option.
Facility	Your school has access to a facility for the long term to house your school and its turnaround efforts.	Your school has access to a smaller facility for the long term to house the school's remaining programs, or can adapt in its current facility to serve fewer students in a financially sustainable way.	Depends on what the new operator needs from a takeover. The facility could play a significant role if a potential takeover operator is interested in taking over a school with an attractive building that is owned by the school or has a reasonable lease. Without those conditions, the operator may be less interested in serving the students in your existing building.	The building is not desirable for other operators or suitable for your school.
School Leader Capacity	Your school leader has a clear plan for turnaround, and past annual school leader evaluations demonstrate they have the capacity to be successful. OR The board has hired a new school leader it believes can be successful. OR Your school plans to engage an external consultant who will identify appropriate leadership as part of the turnaround effort. OR The school leader may be able to turn things around with the support of additional senior staff.	Your school leader has a clear plan for turnaround, and past annual school leader evaluations demonstrate they have the capacity to be successful. OR The board has hired a new school leader it believes can be successful. OR Your school plans to engage an external consultant who will identify appropriate leadership as part of the turnaround effort. OR The school leader may be able to turn things around with the support of additional senior staff.	Ideally, your school leader is capable of leading an effective transfer to the new operator, with or without the support of additional senior staff. OR The school leader is not capable of leading the school going forward, but the new operator will install a strong leader.	Your school is on track to close for reasons outside an effective school leader's control OR your school leader is ineffective as demonstrated by annual evaluations.
Board Capacity	Board capacity matters when it comes to making this decision. For each option, boards must determine whether they are operating according to best practices and are capable of managing the options above. If the board is not effective itself and lacks capacity, it must recognize that it is in fact part of the problem, and must seek support for improvement immediately. The board must ask itself, "How does our effectiveness influence the best path forward for our school?" Boards may benefit from bringing in an outside party or conducting a self-assessment with input from other school stakeholders in order to assess its effectiveness.			

Keep in mind that the number of options available to boards decreases over time. It is the board’s responsibility to identify the path forward. It can do this in partnership with the school leader, especially when the board has confidence in the leader’s abilities. But at the end of the day, this is the board’s call alone. The school leader either will be a partner or will not. If they are resistant to changes or don’t see it as a crisis, then they will not be a good partner and the board needs to act.

Once the board understands its options, it needs to have an honest conversation about how to move forward. Discuss the decision tree below, answering the questions for your school and its campuses.





FOCUS TIP: Top Mistakes Boards Make When Facing a Decision on Turnaround/Takeover/Closure

- **Believing that someone other than the board will lead the school through the process or “have the answer.”** If a school is not on track to achieve its goals, the board must play an active role, including exploring whether the school leader or charter management organization is the primary reason that the school is not meeting its goals. The board will need to come up with an answer and take action. In some cases, the school leader can play the primary role in driving the decision process. In other cases, the school leader is not equipped to do this. In still other cases, where the school leader is part of the problem, it may be inappropriate to involve that leader in the process. The board must be prepared to drive the process itself.
- **Failing to address leadership and/or governance problems early.** By regularly evaluating the school leader or the charter management organization, a board should have a good idea of the capacity of its leadership when confronted with a difficult review/renewal. Sometimes failure to achieve charter goals stems directly from weak leadership and an absence of accountability. By the same token, dysfunctional governance can set up a skilled leader for failure.
- **Thinking there is an easy fix.** Managing highly effective schools is incredibly difficult work. Turning around a school in a short time or figuring out next steps for a low-performing school can be even harder. This decision will require significant brain power and attention. Incremental changes are unlikely to lead to dramatic differences in outcomes, and dramatic changes are likely to be disruptive.
- **Assuming the board can do this in one board meeting.** Understand how much time this process takes. Boards are often not prepared to spend the time that this requires and don't have the capacity to do the work that needs to be done.
- **Believing in miracles.** The leader is unlikely to be able to make unprecedented improvement in a short (one- or two-year) period.
- **Being unwilling to invest in change.** Rapid and dramatic improvement is hard, and yet schools in trouble often balk at spending money on outside experts or advisers that could make a difference. Whether it is overhauling curriculum or professional development, or hiring an outside turnaround consultant, expect that changing student achievement trends will require you to make significant adjustments to your budget.

Step 3: Communicate With and Meaningfully Ask Your Stakeholders for Input

Charter schools are located in neighborhoods and are key members of their communities. Charter school boards must define their stakeholders and conduct significant outreach. For example, your school’s engagement could include any or all of the following:

- Families and students (current and former)
- Teachers and staff
- City Council members
- State Board of Education members
- Advisory Neighborhood Commission members
- School partners, such as feeder preschools or high schools
- Neighbors and neighborhood organizations (civic associations, Ward Education Councils)
- Nonprofit organizations, partnership organizations, religious organizations
- DC agencies, businesses, landlords, or vendors nearby

Regardless of which option your board is exploring if it is facing challenges to passing review/renewal—whole-school turnaround, partial turnaround + partial closure, takeover, or whole-school closure—it is essential to engage your community at the appropriate time in order to achieve key goals:

- **Build community-wide understanding of review/renewal and the school’s chances for continuance during a review or renewal process.** The more engagement you do on the front end, the more likely your school will embrace the ultimate decision. Help stakeholders understand:
 1. The school’s risk of not securing charter continuance or renewal.
 2. The DC PCSB charter school accountability process (i.e., review and renewal requirements to remain open).
 3. The role of the school’s board in the review/renewal and decision-making processes. Make sure the community understands that it is the board’s decision to determine how to move forward and that the board needs the community’s input in order to make that decision.
 4. Your school’s goals and what needs to change in order to reach those goals.
 5. The options the board is considering, including the pros and cons of each.
 6. How the community may engage with the board throughout the process.
- **Solicit authentic, community-wide input** early on how to best proceed. Listen to your community’s insights or ideas about what is and is not working to ensure that the board is accurately addressing the right problems. Ask the community what is most important to them and what structures, values, and expectations the community holds for the future. Communicate those priorities and use them as significant inputs in the board’s decision-making. Boards have had these conversations with their stakeholders through community forums, surveys, and focus groups. Make sure to build a timeline for this engagement that allows enough time for the community to adequately and authentically engage and give feedback.

Involving staff and families in grappling with these questions will result in greater transparency, buy-in, and ideas for moving forward. Often other stakeholders hold information or can see a part of the organization the school's board cannot. These perspectives help shape best thinking about the school's options.

Make sure to document all stakeholder engagement activities using sign-in sheets, agendas, notes, and public announcements. This will enable you to demonstrate the extent of your outreach and the community feedback you collect.

- **Communicate to DC PCSB the community's opinions** on how they think the school should proceed. Reach out to the DC PCSB staff and Board to keep them updated on your community engagement activities and help them understand community concerns.



DC PCSB & FOCUS TIP: Communicating with Stakeholders while Considering a Path Forward

- **Communication requires time and effort to do well.** Consider creating an ad hoc committee of the board dedicated to communications to ensure that the two-way conversation that needs to happen is done strategically and regularly. Have some standard document templates including flyers, press releases, and letters to staff so that as you know information you can fill in the blanks.
- **Introduce the board to the community.** Most board members have not regularly engaged with the community outside of board meetings. They are often not at school events, not meeting parents, and not engaging with staff. Therefore, most school communities do not know their board members or the real role of the board. It can be difficult to trust a board made up of unknown individuals from outside the school's community and who wield such power as the ability to close the school. Throughout the years, board members should make themselves more visible in the school, answer questions from community members, and overall build a relationship with the school community. This will begin to build trust, which is especially important when the board has such a difficult decision to make.
- **Be honest with your community about where your school is compared with its goals.** All stakeholders must understand the good and the bad when it comes to progress toward the charter goals, finances, and compliance. Balance the need to talk about inputs, how you're doing your work, with outcomes, what you're measured against. This is particularly important if your charter does not have a clear path to passing review or being renewed. Your families and staff deserve better than being caught off guard when it is too late to turn around the school. Tell them the truth as early as possible, ideally whenever you get disappointing results.
- **Ensure that your staff knows its role in the review/renewal process.** Teachers and staff must understand what it will take to meet or surpass the goals in the charter. When possible, teachers and staff should be a key stakeholder group you engage and inform.

Continued on next page

- **Be thoughtful about *how* and *when* you ask for community input. Ask for community input early in your exploration process.** Hold community meetings with staff and families to help them understand the options and get their input into what they think could serve students well. In these conversations, it is essential to make sure staff and families understand that this input will inform the board's decision making—and that this decision is the board's alone.
- When holding meetings for families, make sure to cater to times when they are available to join. If the meetings are in the evening, consider bringing pizza and drinks, providing child care, and anything else your families need to free up their time to attend.
- Consider giving families advance notice and reminders to drive participation. Often a quick reminder can help make the difference in turnout.
- Use a variety of tactics (closed Facebook group, etc.) and create multiple opportunities to engage stakeholders.
- Communicate continually. Make sure to keep the community up to date on the progress toward renewal/review. For example, once the community identifies priorities, communicate the priorities back to the school community to demonstrate that you as a board are listening. Perhaps hold office

Boards often hold decisions close while debating the path forward, often out of fear of destabilizing the school community. This legitimate concern needs to be balanced against the benefits of communicating with key stakeholders sooner rather than later. Often parent board members can be helpful guides as to when and how to bring in the broader community.



FOCUS TIP: Outreach to the DC PCSB Board

You may also want to reach out to individual members of the DC PCSB Board to explain your decision process and the steps you are taking. You may be able to get a sense of what they are thinking with regard to review or renewal. The DC PCSB Board is independent of the staff, and even when the staff makes a recommendation one way, Board members can make their own decision, and Board votes are not always unanimous. This is more likely to be a factor in reviews than in renewal decisions, when the Board has less discretion.

It may be helpful to build advance support for complicated transactions such as takeovers and partial closures.

Step 4: Choose a Path Forward

Considering the decision tree from above, choose a path forward. Explore the “Deep Dive” sections for each option, below:

- **Deep Dive: Whole-School Turnaround**
- **Deep Dive: Partial Turnaround + Partial Closure**
- **Deep Dive: Takeover**
- **Deep Dive: Plan for Whole-School Closure**

As a reminder, schools do have the choice to take no action and wait for DC PCSB to complete its review and renewal processes. As discussed above, the risk with this option is that if DC PCSB decides to close the school, the school’s board has taken no steps to explore alternatives and perhaps missed an opportunity to keep the school open by choosing partial closure + partial turnaround or identifying another operator to take over the school.

Keep in mind that your Plan A path might not materialize and you need a Plan B. Opportunities change quickly. Creativity is key here.



FOCUS TIP: A Note about Communicating with DC PCSB Board Members and Staff

See DC PCSB as a necessary partner. You will undoubtedly have strong feelings about your school’s performance, and it will be easy to blame DC PCSB for your school’s failure. Rather than be antagonistic, recognize that it is the Board’s legal responsibility to close schools that are not meeting their goals at renewal and those that are unable to show progress toward meeting their goals at other high-stakes reviews. They are just as concerned and focused on your students as you are and they want to invest in their future. To that end, DC PCSB has family engagement specialists to help displaced families navigate the lottery process. They will work with you and your community to support your decision.

Deep Dive: Whole-School Turnaround

Whole-school turnaround means doing just what it says: turning around a school to improve its areas of deficiency—academic, financial, and/or compliance. Whole-school turnaround is not easy; it requires significant changes, often throughout all levels of the organization.

In summary, the steps for whole-school turnaround include the following:

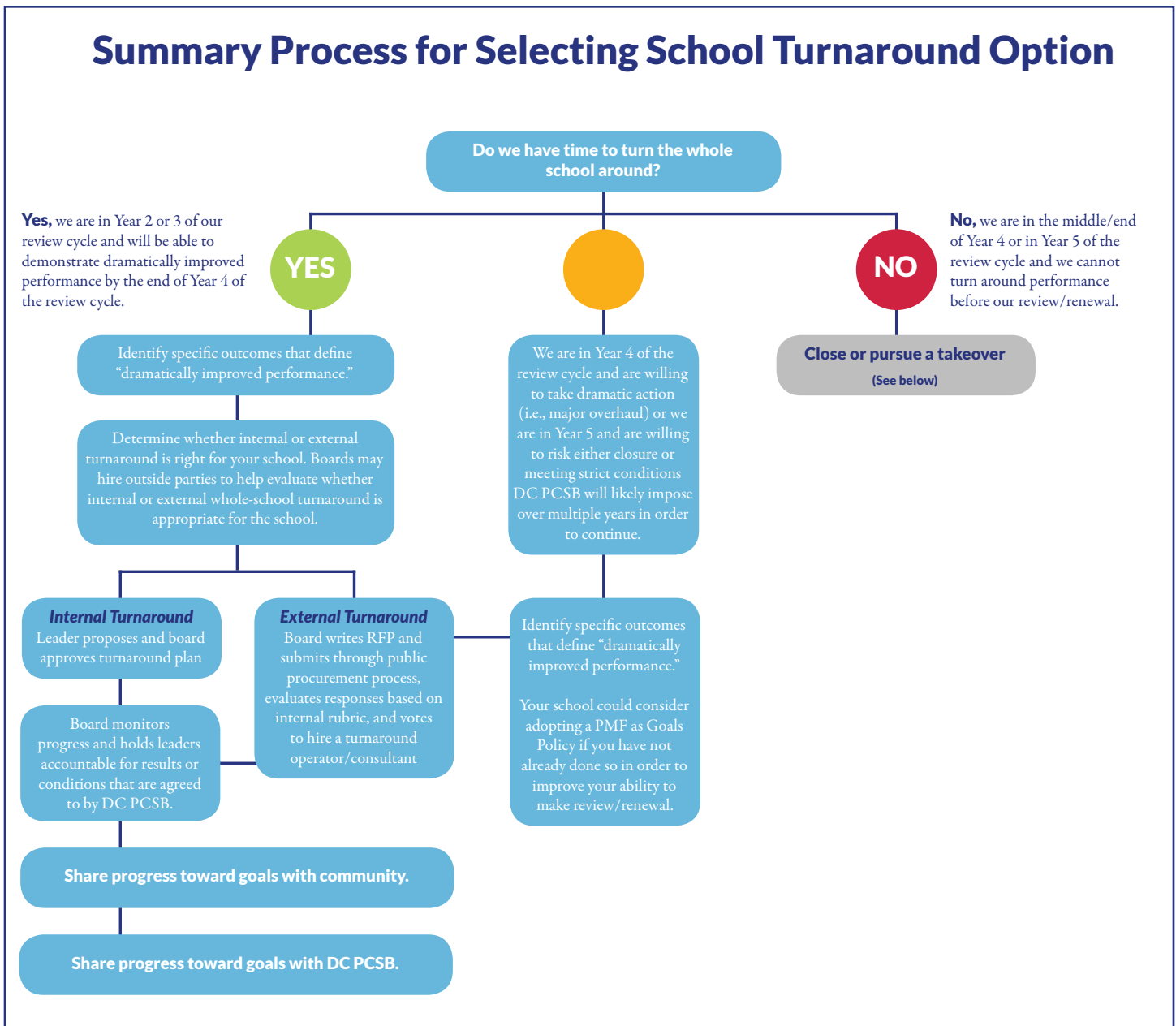


Whole-school turnaround efforts should begin as early as possible. While there are always exceptions to the rule, best practice is to initiate turnaround as early as possible (Year 2 or 3) and no later than the beginning of Year 4. The later you start, the more likely you will miss your goals and be continued only with strict conditions for future performance which, if missed, would lead to the automatic closure of the school in future years. Turnaround begun in Year 5 is particularly risky; even if DC PCSB decides to continue the school it would likely be with very aggressive conditions, including outcomes for Year 5, that could, if not met, lead to school closure. The longer you wait, the more dramatic changes you will need to implement, the less likely you will be able to demonstrate adequate improvement, and the higher the risk that you are either closed or continued with strict conditions that will lead to future closure if not met.

Generally speaking, there are two paths for whole-school turnaround:

- **Internal:** Turnaround that is driven by leadership at the school level. It could be done through a new plan designed and managed by the school leader or by a new school leader or additional key staff.
- **External:** Turnaround that is led by outside consultants who specialize in supporting school-based teams in deep, fast, and effective improvement.

At a high level, the process for determining whether whole-school turnaround is right for your school is as follows. Note, this process is not absolute—each school is unique in its options depending on its charter goals, progress toward them, and ability to take quick action that leads to demonstrable improvement fast.





FOCUS TIP: The Two-Year Tipping Point

DC PCSB needs to see demonstrated improvement. If you are not on track to achieve your goals after two years of a five-year term, boards should approve turnaround efforts at this time. Schools do not turn around in six months or even a year. DC PCSB wants to see demonstrated improvement even if you have not met your goals in a review cycle, and if you wait too long to take big action—replacing a school leader, changing the charter management organization, making significant changes to instruction—your students may not have time to show enough improvement to secure a positive review or renewal. Do not wait.

More specifically, steps for exploring and implementing whole-school turnaround are as follows:

Step 1. Determine whether you realistically have time to turn around the school as a whole given the date of your review/renewal (see above). As a reminder, if you have not initiated comprehensive turnaround efforts by at the very latest the beginning of Year 4, and ideally earlier, it is very unlikely you will be able to demonstrate that your efforts have led to improved results. Turnaround begun in Year 5 is very risky because the school could very well face closure (particularly if this is a renewal, where the school must meet its goals) or, in the best case, would most likely need to meet very strict conditions for several years that could lead to future school closure if missed.

Turnaround efforts can take a while to get right and to show results, so it is far better to implement them in Year 2 or 3 of the review cycle. Remember: Review and renewal decisions are based largely on academic data, which becomes available each August (PARCC) and October (PMF). This means that the data from the fourth year of your five-year renewal/review period is the last available data the DC PCSB Board will have as it determines how to vote.

Step 2. Consider whole-school turnaround in the context of review and renewal. Solid evidence of improvement might be enough to get you through a review with conditional continuance. At renewal, only if the school has met its charter goals can the school’s charter be renewed. Review your charter goals and the PMF as Goals Policy, work toward improvement, and understand the difference between and implications of review and renewal.

Step 3: Identify what is required for whole-school turnaround to succeed in meeting your goals. Make a rubric and identify what needs to happen in order for you to reach your goals. Have a data-informed conversation about what it would take to reach that goal, given where you are now. What people? Time? Resources? Structures? See an example of a rubric below.

Year 1	Year 2 Current Year	Year 3	Year 4	Year of Review
PMF 30	PMF 37	What major steps do we need to take in the next two years to average 40 on the PMF by Year 5? We are in an upward trajectory, but is it enough? Where are our deficits in the PMF, and are they easy to fix? Is it feasible? What must change, and how will we know the school is on track?		Need to average a 40 on the PMF. Data from your fifth year will not be included in a review period.

Step 4: Determine if internal or external whole-school turnaround is viable for your school. If you do have time to do a whole-school turnaround of the school before your renewal/review, you then need to determine as a board whether your turnaround is internal or external. A third-party review of the school's performance could be helpful in this decision as well.

Internal Turnaround

An internal turnaround is one that is driven by leadership at the school level. It could be done through a new plan designed and managed by the existing school leader or it could be done under a new school leader. If the board chooses an internal turnaround, the school leader should create a turnaround plan and be able to speak to how the plan will accomplish measurable goals. The board should have internal benchmarks to hold the school leader accountable and a plan for what will happen if the school does not meet these goals.



FOCUS TIP: School Leaders and Internal Turnaround

Keep in mind that an internal turnaround might require a leadership change. Make sure the board is confident in who is going to lead the work. However, be careful about changing your leadership and assuming the new leader will be able to implement turnaround activities. How do you know? It is common for struggling schools to churn through school leaders and show no academic improvement. Some things to consider:

- Is the board good at hiring talent?
- Does the board know what makes a school leader capable of turnaround?
- Has the board provided enough support to leadership in the past?
- How will the board provide oversight and support to a new leader?
- What resources might be needed?
- Is it possible the board is part of the problem?

If your board does not have confidence in the leader, and/or in its ability to supervise and support the leader, you may want to consider external turnaround (below).

The board should vote to approve the goals and the turnaround plan. The board should then communicate this plan with the community and DC PCSB, providing ongoing updates.

Consider the self-study on the next page to determine whether internal turnaround is realistic for your school?

Self-Study: Is an Internal Turnaround Realistic?

QUESTION	INTERNAL TURNAROUND
<p>Has your annual evaluation of your school leader shown them to be highly effective and making positive, consistent progress toward goals?</p>	<p>Yes? Internal turnaround could work: The leader may have the plan and ability to turn the school around.</p> <p>No? You may not have the right leader to be successful in internal turnaround work and you may need to hire an external consultant. The school leader may be part of the problem.</p>
<p>Is the school leader open and transparent with the board about school performance? Is the school leader bringing concerns about performance to the board, or is the board the one raising these issues?</p>	<p>Yes? Internal turnaround could work. The leader realistically examines the data and understands the implications.</p> <p>No? Red flag—you need a school leader you can trust will share bad news as well as good news. You may not have the right leader to be successful in internal turnaround work. Consider external turnaround.</p>
<p>Does the school leader have a plausible theory to explain performance gaps, and a credible plan for making improvements that will lead to meeting charter goals?</p>	<p>Yes? An internal turnaround plan could work. The changes the school leader proposes should be significant enough to drive big shifts in performance. Even better if strategies have worked elsewhere.</p> <p>No? If you can't identify the problem, it is harder to implement an effective solution. Consider external turnaround.</p>
<p>Does the school leader reference DC PCSB documents, such as the PMF, the FAR, the Equity Reports, and OSSE's report card, when sharing information? Do they show how the school performs compared with the city averages? Is the school leader's account always consistent with publicly available information?</p>	<p>Yes? The school leader could be an effective partner in turnaround work.</p> <p>No? Consider external turnaround, bringing in experts who can leverage multiple data sources and leverage analysis to improve performance.</p>
<p>Does the school leader have a track record of successful change initiatives? Has the school leader created annual or semiannual goals and shown that the school can make them? For example, a goal could be: "We will increase in-seat attendance rate at campus X from 93% to 93.5% in six months." Or "We will increase the performance of our students with disabilities across all grades on the state assessment by 3%."</p>	<p>Yes? The leader understands how to set goals and put in place strategies for achieving them. This ability is essential to creating and implementing an internal turnaround plan.</p> <p>No? The leader may be capable, but this challenge may be outside of their skill set—you don't know for sure. Consider external turnaround.</p>
<p>Does the school have other organizational problems—financial, compliance?</p>	<p>No? If your school leader is a strong instructional leader with a solid turnaround plan, internal turnaround could work.</p> <p>Yes, problems in all areas? This suggests the need for a more comprehensive overhaul, perhaps better done by an external consultant.</p>
<p>Where are you in the review cycle?</p>	<p>Year 2 or 3? You have time to try different approaches; internal turnaround could work.</p> <p>Summer before Year 4? You need to take urgent decisive action that will have immediate impact. Consider external turnaround.</p>

External Turnaround

If a charter school board does not believe it has the capacity or plan to successfully execute an internal turnaround, it may choose to do an external turnaround. An external turnaround is led by outside consultants who specialize in supporting school-based teams in deep, fast, and effective improvement. Should a board choose external turnaround, it will need to take the following steps:

- Determine what matters most to the board in a turnaround operator. For example, the board could prioritize finding an operator with a proven record of doing this work successfully in other schools with similar student populations. Or it may focus on mission alignment in terms of program and curriculum. The board and the turnaround agent must agree to meeting the goals, as amended, in the charter.
- Create a working group comprising staff, families, and board members to write a Request for Proposals (RFP) for turnaround operators. Because the cost of a turnaround operator will generally exceed the \$25,000 threshold for the SRA's charter school procurement requirements, make sure to post the RFP through the public procurement process.
- Create a timeline with multiple points for community engagement. All proposals should be made available to interested community members, and the working group should be available to speak to families and staff about the process.
- The working group should create an internal rubric, which is approved by the school's board, and evaluate RFP responses against that rubric to understand whether this proposal meets the school's needs.
- Once the responses come in, the working group should jointly evaluate responses against the rubric, narrowing the choices and choosing at least two operators to interview.
- The working group and all board members should have the opportunity to interview the consultants and, if possible, visit the schools they have turned around in the past. In talking with staff, board members, and family members at these schools, make sure to ask key questions to give you a sense for this consultant's working style, priorities, and impact, as well as dive deeper into parts of the consultant's proposal that need more detail and discussion.
- Using the interview data, combined with the rubric evaluating the proposal itself, determine which turnaround consultant is right for your school. Confirm how the board will hold the turnaround consultant accountable for results.
- Take a charter school board vote in public to select an external consultant.
- Update DC PCSB on your plans.

Step 5: Oversee turnaround efforts closely. Continue to have conversations about progress to annual and longer-term charter goals. Perhaps assign responsibility for monitoring the school's progress toward goals to the board's academic committee to dive deep into the data and then report to the full board. Monitor interim data such as reading assessments throughout the year to see if efforts are working. If the data is not turning around, it is important to course correct immediately.



FOCUS TIP: What to Look For in a Turnaround Operator and How to Hold the Operator Accountable.

- Demonstrated track record: Has this entity successfully turned around other schools? Were those schools similar to our school, in terms of population? Mission and program? Level of improvement needed?
- Be aware that dramatic improvements require dramatic steps, and these may not make all stakeholders happy.
- Maintain perspective around costs—turnaround contracts tend to be expensive. Try to take a long view and evaluate what you will get from your investment. Ideally a turnaround can reduce your expenditures and create healthier finances in the long term.
- Be wary of lowball bidders. Do they really know what they are doing? Can they realistically deliver on their promises given the scope of work?
- In an ideal world you are choosing from multiple proposals, but you might not be. You should still have a process for discussing and assessing whether the operator can deliver what you need.
- Ensure that the contract with the turnaround operator includes measurable interim goals that the board can use to hold the operator accountable. Require the operator to share progress toward those goals on a regular basis, articulating where they are on track, where they are not, and strategies they are using to move forward.

Step 6: Announce the turnaround plan to the community and continue to update it on turnaround progress.

Communicate turnaround plans and progress to your community. If your school has hired outside consultants, communicate with stakeholders about the role of the outside consultants, why they were hired, what problems they are coming in to solve, what authorities they have, any progress they are making, where to go with concerns, etc.

Also share progress with DC PCSB through formal annual reports and more informal meetings along the way. Build a relationship with DC PCSB so they understand not only what you are doing and why, but also how the board is holding the school leader/consultant accountable for turning around results.

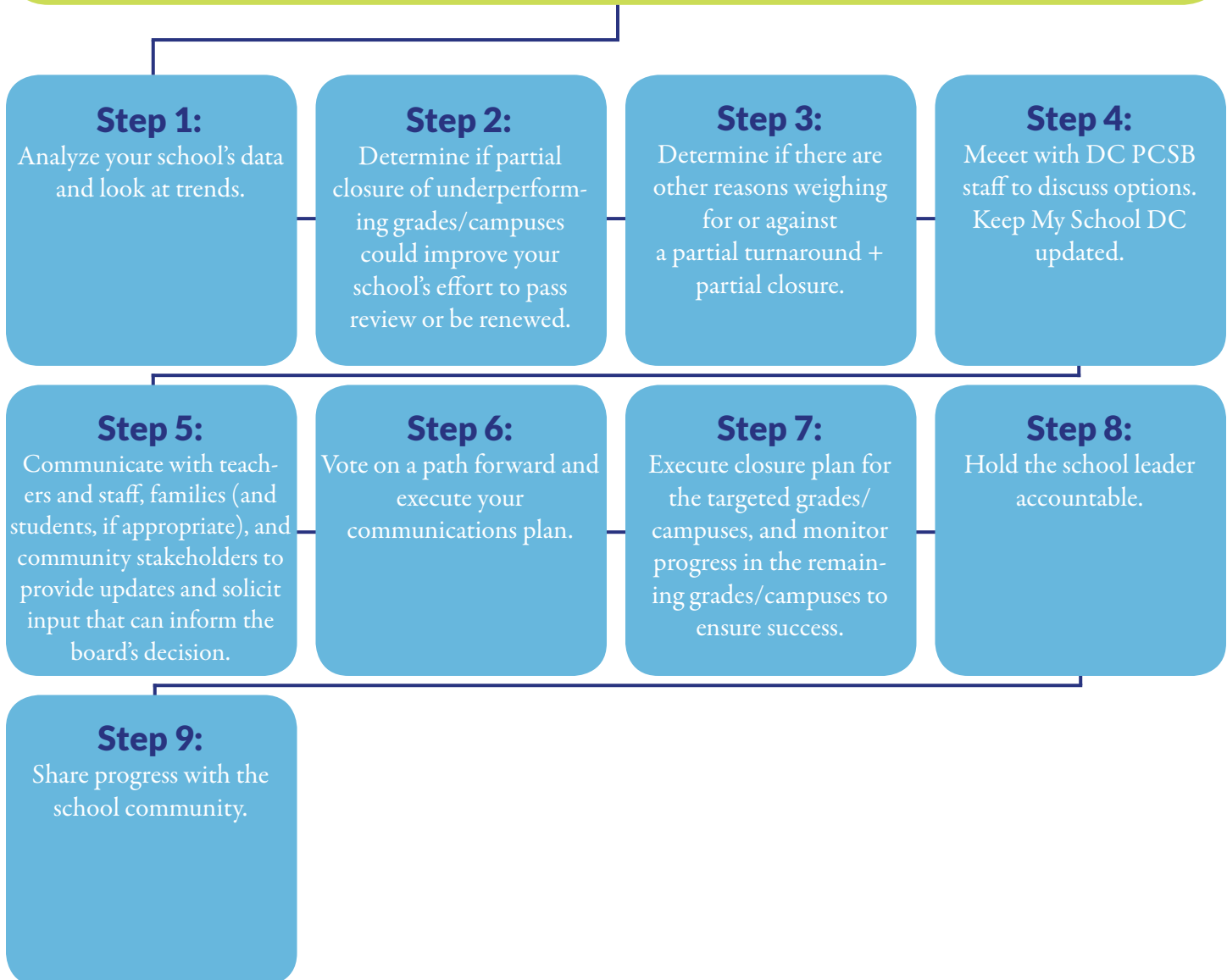
Deep Dive: Partial Turnaround + Partial Closure

As outlined in the decision tree above, partial turnaround + partial closure can be a highly effective way to turn around a school with mixed performance. In this scenario, the board chooses to close or phase out its lower performing grades or campuses in order to reallocate resources to the more successful parts of the school.

Consider a PreK – 8 school under threat of not having its charter renewed, with a strong elementary school and a consistently underperforming middle school. The board could choose to close or phase out grades 6 through 8 and focus on operating a highly effective elementary school. The school would likely be able to keep its charter and preserve its authority to operate the school for the remaining grades.

In this scenario, schools must consider carefully the financial implications of having fewer students and therefore less revenue.

STEPS FOR EXPLORING A PARTIAL TURNAROUND + PARTIAL CLOSURE



Consider the steps in more detail as follows:

Step 1. Analyze your school's data and look at trends. As the board looks at its data, it may find that the school is not on track for a successful review or renewal. Dig deeper into trends. Are some campuses performing well and others historically underperforming despite sustained attempts at turning them around? Do some grade spans consistently perform at the target level while in other grade spans, no matter what improvement efforts your school has put in place, students continue to perform at a lower level than other grade spans? If so, continue to step 2.

Step 2. Determine if partial closure of underperforming grades/campuses could improve your school's effort to pass review or be renewed. Analyze your data to examine whether this option would improve your chances of meeting your charter goals for review or renewal. For example, if you are operating a PreK – 8 school that has adopted the PMF as its charter goals, what is your average PMF score over time if you separate the elementary and middle school PMF scores? Do your chances of being continued or renewed go up dramatically if you only factor in the elementary grades?

This scenario could also play out in a school with multiple campuses where one campus in particular is struggling. Compare the option of partial closure with the odds of a successful turnaround. Does your school have a better chance of keeping the organization's charter by closing or phasing out that low-performing campus? If so, continue to Step 3.

Step 3: Determine if there are other reasons weighing for or against a partial turnaround + partial closure. There are several scenarios where partial turnaround + partial closure could be the right solution. For example, if your school has expertise concentrated in certain grades or campuses or struggles with enrollment, culture, or staffing in certain grades or campuses, this could be a viable option. Conversely, there may be reasons your school should not pursue partial turnaround + closure. For example, if closing certain grades and campuses (and therefore lowering student enrollment) causes financial strain on the school as a whole, this may not be a feasible path.

Note that closing grades/campuses does not always mean reducing enrollment. Some schools have found creative financial solutions to losing students such as subleasing the space made vacant by these grades to other schools.

Other reasons not to pursue partial turnaround + partial closure could include stakeholder desires and needs, and overall coherence of the program. If lower performing grades/campuses are feeding into a higher performing grade span/campus, you need to consider whether eliminating the feeder grades/campus is likely to have a positive or negative effect on future performance of the remaining grades/campus.

Step 4: Meet with DC PCSB staff to discuss options. Keep My School DC updated. DC PCSB staff is available to support schools in doing this type of analysis and brainstorming options. Partner with them to determine how to effectively go down this path with as little disruption to families as possible. For example, if a school needs to close its middle school, it might do so gradually, allowing current students to finish their middle school experience while not enrolling any new students in the middle school.

Make sure to inform the staff at My School DC, which operates the enrollment lottery, that you are considering this option so it may plan your school's place in the annual lottery accordingly.

Step 5: Communicate with teachers and staff, families, and community stakeholders to provide updates and solicit input that can inform the board's decision. As discussed above, it is essential that the board keep the staff and families informed about the school's data and the options for moving forward. Ask for input into how they think students can be best served given the school's chances at successful review/renewal and incorporate that feedback into the board's deliberations.

Step 6: Vote on a path forward and execute your communications plan. Take a charter school board vote in a public, open meeting on how to best proceed and create a communications strategy that informs all stakeholders of the next steps.

Step 7: Execute closure plan for the targeted grades/campuses, and monitor progress in the remaining grades/campuses to ensure success. Depending on the strategy discussed with DC PCSB staff, the board then oversees the school's execution of the plan to close or phase out parts of the school in order to minimize disruption to families. DC PCSB will support students and families in finding new schools for the coming year.

Step 8: Hold the school leader accountable for results by doing formal evaluations of their work.

Step 9: Share progress with the school community—staff and families—and DC PCSB so they know how the school's efforts are progressing.

Timeline

If a school is going to close targeted grades or campuses, it is important that this decision is made ahead of the lottery deadline. My School DC organizes the annual lottery for all DC public school students. Families enter the lottery each year, ranking the schools they most want their children to attend. The lottery opens in December for families to begin ranking their preferences and closes Feb. 1 for high school students and March 1 for everyone else. Parents who have not entered the lottery by March automatically re-enroll their children in their current schools or later have the option to transfer to their home DC public school or put their children on a wait list.

It is important for the charter school's board to have a clear plan about the direction it will take as early as possible, ideally by the end of October, and to launch its community engagement process—talking with stakeholders and DC PCSB.

Deep Dive: Takeover

As shown in the decision tree above, in a school takeover, otherwise known as an asset acquisition or restart, the charter school board determines that the best solution for its students is to keep them together in one school under a new operator. This can be an option either when the school's board decides to voluntarily relinquish its charter or when the DC PCSB Board votes for non-renewal or charter revocation. The new operator will assume responsibility for key assets of the closing school, which could include students, real estate, supplies, technology, etc. Once the charter expires, the board dissolves and the board of the school taking over will be responsible for the future performance of the school.

The primary benefit of a takeover is that students in the existing school are guaranteed a seat in the new school, eliminating the need for families to re-enter the enrollment lottery unless the student does not want to attend the school that is taking over the operations. In addition, high performing or key teachers and staff are often offered positions within the new operation, providing consistency for families and students through a potentially tumultuous time, as well as stability for many staff members.

Once the new operator takes over the school, it will restart the program according to its own mission and vision. For this reason, the board should carefully consider how any potential new operator's model and values align to the needs of the school community. The specifics of the takeover will be memorialized by a written agreement between the schools, and the transaction must be approved by the DC PCSB Board.

There is no single model for takeover. It could look like any of the following:

- Existing DC charter operator takes over your building and serves your students in that building.
- Existing DC charter operator agrees to absorb your students into its existing campuses.
- Charter school network that is not already working in DC¹⁵ takes over your building and serves your students.

Steps for Takeover

There are several overall steps for takeover. Like all of these options, this process is an art, not a science. The following steps are guidelines for a school board's consideration. The key question the board needs to continually ask is, "What is best for our students?" Sometimes the answer is not immediately clear. However, board members can ask for key information and do significant diligence to ensure they are making the best decision possible in service of students and families.

¹⁵Note that this option is available only if the outside charter network holds a charter with DC PCSB. If not, the outside network would need to apply for a charter, which would need to happen the year before the school's review. The timing constraints make this situation rare.

Ideally, steps for takeover include the following:



Note, charter school boards do not always come to takeover as a first option. Takeover can also be a viable path after a failed turnaround or after the DC PCSB Board has voted to close the school.

Consider each potential step in detail as follows.

Step 1: Decide whether takeover is the right path for students.

- **Solicit input from the community.** As discussed above, the board and leadership must be clear with their community—teachers and staff, families, and students—about where the school stands in relation to its goals for review or renewal and solicit ideas for how the community thinks the school should proceed. Create a communications plan that includes authentic opportunities for stakeholder input and external outreach.
- If the board decides takeover is the right option for students, **the board must vote** to search for another operator to take over the school.
- **Notify DC PCSB** about your decision to relinquish the charter¹⁷ and search for a candidate to assume responsibility for the students and program.

¹⁶In some cases schools, through pre-existing relationships or a natural alignment of program models, have identified a single takeover candidate and skipped Steps 2 and 3. While a formal selection process is recommended, it is not required. However, DC PCSB will generally not permit low-performing schools to engage in takeovers, so charter school boards should be confident in the high quality of the takeover candidate if they have identified only one.

¹⁷Again, while boards seeking takeover partners often voluntarily relinquish their charters, a board can also seek a takeover after a vote by the DC PCSB Board to revoke or not renew the school's charter.



FOCUS TIP: Tap into Experience

Consider contacting the board and leaders of other schools that have gone through takeovers before. Ask them about their lessons learned, recommendations for moving forward, referrals to attorneys, etc. Do what you can to not reinvent the wheel.

Step 2: Design a process the board will use to choose an operator. The ad hoc strategy committee, described above, can lead the board's efforts to explore options, communicate with stakeholders, and ultimately make a decision. As the board considers takeover options, it could be helpful to create two additional structures the board can lean on to make this decision:

- **Working group that includes ad hoc strategy committee members, faculty, and families to provide input to the board.** The choice of a takeover operator is solely the charter school board's decision, as the board holds the charter. However, it will be important for the board to get meaningful input from stakeholders with multiple perspectives to ensure that the board is making this decision while considering all angles. Consider creating a working group of ad hoc strategy committee members, faculty (two), and families (two) to serve as a formal source of input into the decision. Write a job description for the working group that clearly articulates what it will and will not do. Document norms of the group, including how you will handle confidentiality.
- **Master calendar for executing this work.** Schedule all committee meetings at the beginning of the process. All participants in this process are incredibly busy people. Set a cadence of meetings and schedule them up front so individuals can hold time on their calendars for these conversations.

Step 3. Identify priorities and release a Request for Proposals.

- Incorporating stakeholder feedback, **identify what qualities and characteristics in a new operator are most important to your board, teachers and staff, families, students, and community.** Is it academic outcomes in schools whose student demographics are similar to yours? Is mission most important? Is it keeping a specific part of your program?
- **Share that list of qualities and characteristics with teachers and staff, families, and other stakeholders who have been engaged.** Make sure they understand the path and priorities, and how the working group incorporated its feedback into this list. Consider having a board member share these qualities at a staff or family meeting and answer any questions that arise. It is important that the board stay visible throughout this process so the community understands who is managing the work, has a chance to continue to provide input, and sees progress.
- **Write a Request for Proposals (RFP)** that asks potential operators to answer questions about the school's priority characteristics and requires data on the operator's academic, financial, and compliance history. Make sure to share enough information about your school's academics, financial status, real estate status, and other key components of your school within the RFP so an operator can make an informed decision about whether this is a school it wishes to acquire. Be transparent.
- **Post the RFP publicly** according to procurement procedures that can be found on the DC PCSB website. (This whole process can take weeks, so plan accordingly.)



FOCUS TIP: Finding a Takeover Operator

- There are not a lot of operators who are interested in taking over schools in DC, at least in 2019.
- This is a more fluid process than these steps suggest. Operators show interest, and then interest may wane as they learn whether their interests align with what your school has to offer. Key stakeholders may have influence or make decisions you did not anticipate. Be ready for anything.
- You need to plan financially so that you have the resources—an estimated \$100,000—to close out the existing charter.
- Creativity is key in a takeover process. Understand what the operator needs for the takeover to be successful and what the school needs to do to set up the new operator for success.
- An infrequently used option is to look for an operator outside DC to take over your charter. Because this option calls for the **outside operator** to already have an approved charter in DC, it requires considerably more lead time. An outside operator would need to apply to DC PCSB no later than January of the year before the review year and receive approval in March to be eligible to participate in an asset acquisition.

Step 4. Evaluate prospective operators.

- Create a **rubric** based on your school's priority qualities and characteristics that you can use to evaluate incoming proposals.
- **Respond to questions** from potential RFP respondents. Chances are they will want to see additional data to evaluate their ability to take over a school.
- **Evaluate the RFP responses against your rubric.** Document where the responding operator does and does not meet your school's requirements. Identify follow-up questions.
- **See the highest-rated operators' work in action.** Schedule visits to takeover candidates' current campuses. Most takeover operators are other charter schools in DC, so they should be relatively easy to visit. Come prepared with questions raised after reading their response to the RFP. Meet faculty, leaders, and parents, and ask hard questions about their school. Make sure you understand student achievement data that shows potential operators' success in working with similar student populations. If the candidate has taken over schools in the past, ask them about their experience—this is very hard work and often very different from building a new school from scratch. Understand how they are going to manage this task.
- **Consult with DC PCSB.** DC PCSB oversees school takeovers. The acquiring school will generally require a charter amendment to facilitate the takeover, including adding the new campus(es) into the charter agreement. Many schools will also need an increase in their approved enrollment ceiling to serve the closing school's students. DC PCSB has a strict policy laying out which charter schools qualify for enrollment ceiling increases. However, this policy provides for some discretion, particularly in the case of takeovers. Nevertheless, DC PCSB will generally not approve low-performing operators to take over a school. It is therefore vital to have a clear sense of which operators will be able to secure required DC PCSB approvals.

Step 5. Make an informed decision on how to proceed with a takeover.

- **Debrief as a working group** to discuss what members saw and heard, make sure all questions are answered, and fill in any missing pieces or new information into the decision-making rubric.
- **Share working group input** with your full charter school board about which operator, if any, it recommends.
- **School's board votes whether to enter into a takeover relationship** and negotiates an asset transfer agreement with a new operator, which outlines the process, roles/responsibilities of each party, vision for a successful transfer, etc., and governs the transfer of the school's assets. Ideally, this meeting is open to the public to ensure full transparency.

Step 6. Execute communications plan. At this point, your school stakeholders should be expecting a decision from the board already, so the announcement itself should not be a surprise. Be thoughtful and thorough in your communications to ensure that you meet stakeholders where they are. Collaborate with the new operator to ensure that your communications are in sync. For example:

- *Families.* Schools should use every means possible to contact their families: text, email, flyers in backpacks, parent meetings, etc. Be sure to update family contact information throughout the year. This makes it easier to notify families.
- *Teachers and staff.* Depending on the provisions of the asset acquisition agreement, the staff most likely is not guaranteed a job at the school for the coming year and more likely will need to interview for a position in the new school. Be as clear as possible with staff about the implications of this process for them. Lean on the operations team at the school level to ensure that you know the biggest questions and concerns of the staff and can explain the process, benefits, hiring, and other key questions staff will need to know. Do not wait to send out these communications. Give your staff clarity as soon as possible. They deserve that.
- *Elected officials.* Ensure that they understand the change so that they can respond when they get questions from their constituents.
- *Landlord.* If the school has a landlord, communicate with your landlord to ensure clarity on the terms of the asset transfer agreement and be able to answer how this decision will affect the lease.

Step 7. Finalize asset acquisition agreement and any other necessary agreements or arrangements between the closing school and the takeover school. A school takeover is a complicated process; at its core, it involves the legal transfer of assets from a closing school to an acquiring school, along with a guarantee that the acquiring school will enroll the closing school's students at the start of the following school year. The two schools must memorialize the details of the transfer in an asset acquisition or asset transfer agreement, which is a binding legal agreement. It is important that the board engage legal counsel as early as is feasible to help guide the school through this process.

An asset acquisition agreement must be negotiated directly between the two schools involved in the transaction, so no two agreements will be identical. For example, a school that owns its facility and is transferring the building to the acquiring school will need an agreement that looks different from that of a school that rents its facility, or a school whose students are being absorbed into the existing campuses of the acquiring school. Generally, however, the agreement will address in detail at least the following:

- The specific assets being transferred, including any assets to be excluded, as well as any liabilities, and the specific manner of such transfer;
- Any conditions required for the agreement to be final;

- The roles and responsibilities of the two schools, including during the closing year and closure process;
- The acquiring school's enrollment of the closing school's students and details around the process;
- The dissolution of the closing school; and
- Any provisions regarding the treatment of staff, including retention or hiring opportunities for staff and handling staff benefits and contracts.

This part of the process will likely take several months and will involve a thorough assessment of the school's finances, including any loan agreements, bonds, or other outstanding obligations.

Again, a school may seek guidance from an attorney and other qualified professionals as needed for this process to be successful. When considering takeover, the board should account for both the time and the expense it will require.

Step 8. Current board continues to oversee the school throughout the school year, meeting regularly and ensuring that the school's leadership is managing what will be a difficult end of the year. Pay close attention to the following indicators of a successful transition:

- **Staff stay through the end of the school year.** An announcement of a takeover will cause uncertainty with your staff (see above). Ensure that your communication includes all of the details they will need to understand the situation, their options, and how to proceed. Include contact details, consider hosting office hours to answer questions, and if the new operator is planning to recruit heavily from the school, perhaps even share when they will be on campus to interview. Do what you can to minimize uncertainty. Consider offering a "stay bonus" through the end of the year for teachers and staff who finish the year strong according to a specific set of expectations.
- The two schools partner to **work out the details of the agreement.**
- **Oversee a successful closure of the existing school.** The board continues to be active through the completion of the asset transfer agreement, meeting regularly and managing asset transfer activities. See the DC PCSB Closure Manual for details. One board member will need to remain on the board and be responsible for the final wind-down of the current school's 501(c)(3), which usually occurs in February, after the school has closed.

Timeline

If a school is going to do a takeover, it is important that this decision is made ahead of the lottery deadline. My School DC organizes the annual lottery for all DC public school students. Families enter the lottery each year for their students, ranking the schools they most want their children to attend. The lottery opens in December for families to begin ranking their preferences and closes Feb. 1 for high school students and March 1 for everyone else. Parents who have not entered the lottery by March automatically re-enroll their children in their current schools or later have the option to transfer to their home DC public school or put their children on a wait list.

It is important for the charter school's board to have a clear plan about the direction it will take as early as possible, ideally by the end of October, and launch its community engagement process—talking with stakeholders and DC PCSB.

Voices from the field:

Two operators experienced with takeover answer two questions:

“What is important for you when you are looking for a new school to acquire?”

- **Mission fit.** “Is the mission of this school aligned to my school’s mission? We were founded to serve students who do not have a lot of choices or options. Does this school operate in service of that guiding principle? Do they value our program focus?”
- **Facilities.**
 - “Your lease can be your #1 asset or your #1 liability. What options do we have there? Are there opportunities for expansion—flexibility in facility design that makes it work? Is it right on top of a sister school or similar program?”
 - “Facility is important, but can we run the program without the facility?”
- **Enrollment.** “Is there any kind of enrollment risk? Are there enough kids in this neighborhood to fill our school?”
- **Board priorities.** “Is the board committed to keeping this group of students together for a particular reason?”
- **Access to students, families, and staff.** “Can I have access to students, families, and staff to understand what they want in their school and assess whether or not we can give that to them?”
- **Location:** “Can a school survive in this location? Is there a Metro or other transportation so kids can get to school?”
- **Age band:** “Can we effectively serve this age band of students, and how does this fit into our charter’s plans for scale?”
- **Current leadership.** “Is there a high-quality leader at the school who can provide continuity? Is there a change agent in the building to help with the transition? Is there someone in the school who can facilitate the engagement process? Someone with connections in the community who can be the broker? The day-to-day leader to the school is a key player.”
- “Does this board and leadership team have the self-awareness to know that they want to improve, need help, and ultimately a takeover will be good for our students?”

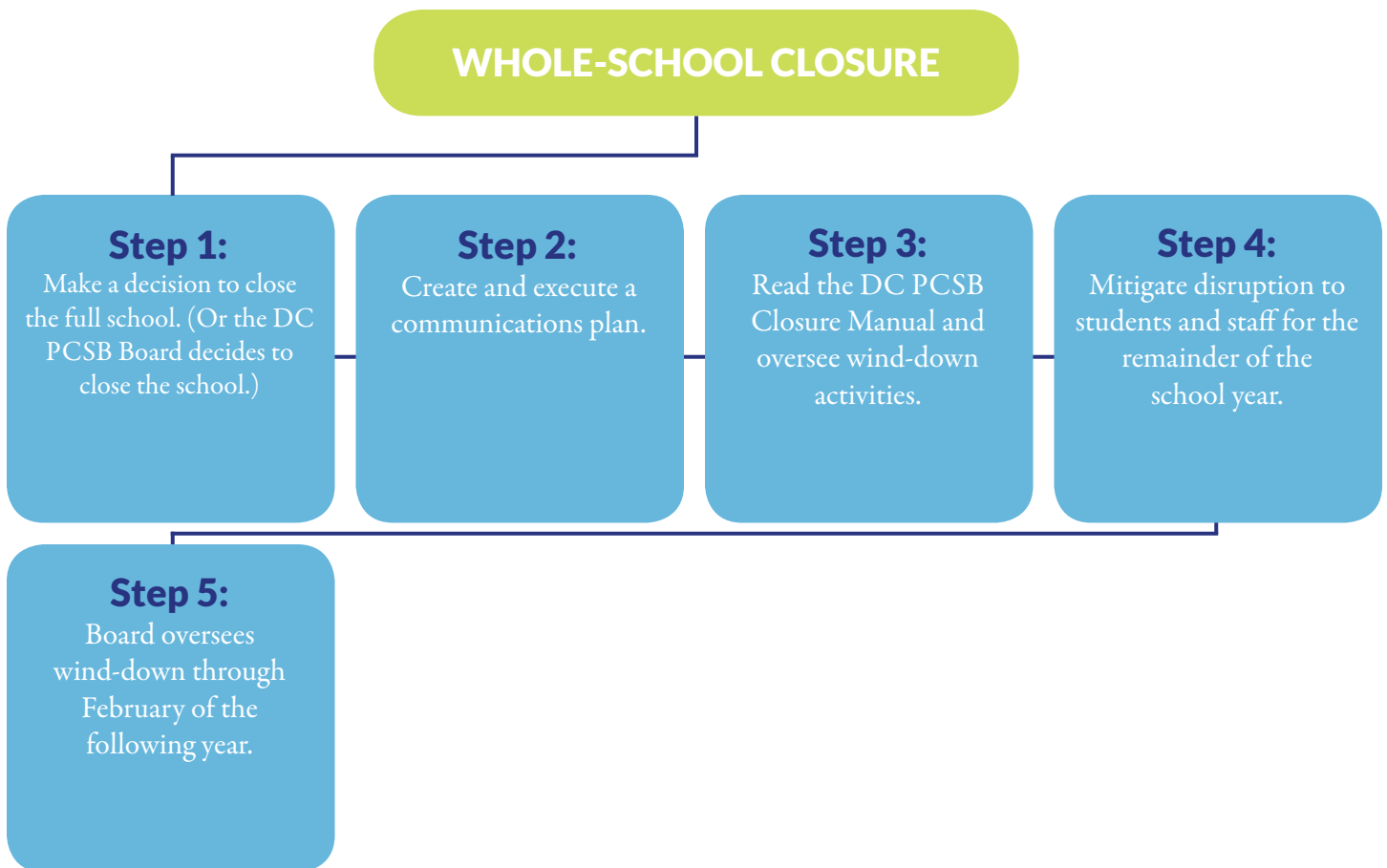
“What advice do you have for schools considering takeover?”

- **Be clear on what matters to your school community.**
 - “Issue an RFP. It helps us know what you care about most and whether from our perspective it could be a good match.”
 - “Request qualifications. Ensure mission fit. You should also include a statement of values, priorities for your community, answering “This is who we are.”
- **Be proactive.** “Do it early. If at the end of Year 3 you don’t think the school is going to be successful in their review, do [the asset transfer] then.”
- **Be aware that operators are paying attention to who is up for review and renewal.** “We are paying attention to the performance of schools entering a high-stakes review, whether they are on track to be successful, and whether we can assist schools with an asset transfer that benefits both schools.”

Deep Dive: Make a Plan for Whole-School Closure

In whole-school closure, the school's charter agreement is relinquished, revoked, or not renewed and the school is no longer able to operate past June 30 of the school year. Without a valid charter agreement, the school will not receive funding from the DC government.

As discussed in the decision tree above, whole-school closure typically happens after the school's board and leadership have neglected to act early enough to address performance issues. The earlier and more proactive boards can be, the more options they have available to them, including turnaround or takeover as discussed above. Often whole-school closure ends up being the last option available when boards have failed to acknowledge their school's reality. As with all paths discussed in this toolkit, boards must rely on a careful analysis of their data and proactive communication with their stakeholders in order to make this decision or be prepared in case the DC PCSB Board decides to close the school.



Consider each potential path in detail.

Step 1. Make a decision to close the full school.

Closure could come about in one of two ways:

A. The **board of the school votes to relinquish its charter because of** lack of confidence in the long-term success of the school—whether that is defined as an inability to meet charter goals, lack of sustainable financial model, unacceptable compliance violations, and/or turnaround and takeover are no longer options. In this scenario, the board realizes it is in the best interest of students for the school to proactively close and support students in finding new and hopefully more effective schools.

B. **DC PCSB Board revokes a charter as a result of a poor charter review or the Board elects not to renew a school's charter for another 15-year term**, forcing it to close. In this scenario, the DC PCSB Board determines that it is in the best interest of students for the school to close and for students to enroll in different, hopefully more effective schools.

Details for both paths to closure are as follows:

Path A: Charter school board votes to relinquish its charter.

As discussed in the decision tree above, boards should carefully track data-specific progress toward their 5-, 10-, and 15-Year goals, and work their way through the available options. When viable options for the school's success narrow, the board may come to understand that the school is not serving the best interest of students and not going to achieve review/renewal. At this time, the board should have a hard conversation about whether proactive closure is the best course of action for students.

A school can prepare for closure and takeover simultaneously, working to determine if another school wants to take it over while it prepares for closure. The key is timing. In any scenario where closure might be the outcome, timing becomes a fundamental driver to give students a chance to find a new school. Even if the board chooses not to proactively surrender its charter, a responsible board will be realistic about the likelihood that the DC PCSB Board will vote to close the school, and will take steps to prepare the school community and plan for students to find other schools.

If the charter school board decides closure is the right option for students, the board must vote to relinquish its charter. That meeting must have a quorum, and a majority of the board must vote in approval. It is best practice to hold this vote in a public meeting so that the community can understand the deliberations and witness the decision.

Next, notify DC PCSB staff. Once the staff has a copy of the minutes from the board meeting including the motion, the staff will begin helping the school wind down. The DC PCSB Closure Manual outlines each step that needs to be taken to wind down the school. Also, notify My School DC and OSSE about your decision and plans.

Path B: DC PCSB revokes or fails to renew a school's charter.

If the charter school board takes no action, the DC PCSB Board will proceed with the review or renewal process as outlined at the beginning of this document.



FOCUS TIP: Risks of Not Taking Prompt, Decisive Action

- DC PCSB will close your school.
- Closure may have been avoidable if you took steps earlier.
- Passively waiting—or aggressively fighting—makes the process worse for students, families, and staff.

Step 2. Create and execute a communications plan.

Create a communications plan that updates the community on the next steps. The DC PCSB Closure Guide includes multiple draft communications to key stakeholders outlining not only what information they will want to understand more about, but also what the school is legally accountable for communicating. Be prepared to deal with the media by identifying one member of your board responsible for communications with the media and clarifying talking points on behalf of the board.

Also consider hosting two board-led community events—one for staff and one for families to help them understand what has happened, how that will affect them, and next steps. Expect to deal with frustrated stakeholders who may disagree with the closure decision. Be honest that, as a board, you ultimately take responsibility for this outcome.

Step 3: Read the DC PCSB Closure Manual.

If the decision is made to close the school, DC PCSB will send you a detailed closure manual on how to wind down the school and will provide extensive support as your board works through the process. Consider creating a closure working group made up of staff and board members who are working toward a concrete project plan.

As part of this wind-down work, get clarity on how your students will find new school placements. Depending on when this decision is made, DC PCSB's family engagement coordinators, OSSE, and your school's family engagement team will create a plan for ensuring that all students have concrete supports to enroll in a new school.

Step 4: Mitigate disruption.

If a school is closing, it is likely to trigger anxiety in school stakeholders. This uncertainty can lead to staff leaving midyear, family confusion about school future/impact on their students, and negative media coverage. Many schools in this situation have seen staff and student attendance drop, discipline issues increase as substitute teachers play bigger roles in the school, and overall challenges to school culture. Do what you can to mitigate these disruptions.

Consider creative options such as “stay bonuses” in which staff who meet expectations for employment for the remainder of the year are paid upon completion of their contract. Reach out to DC PCSB for ongoing support through this process.

Step 5: Confirm commitment from charter school board members through February of the following year.

Identify at least one board member who is committed to serving on the board through February the year after the school closes. Activities do not end until the last federal W-2 form is disseminated and the organization is fully dissolved. You will need board presence until the end of that process.

Timeline

If a school is going to close, it is important that this decision is made ahead of the lottery deadline. My School DC organizes the annual lottery for all DC public school students. Families enter the lottery each year for their students, ranking the schools they most want their children to attend. The lottery opens in December for families to begin ranking their preferences and closes Feb. 1 for high school students and March 1 for everyone else. Parents who have not entered the lottery by March automatically re-enroll their children in their current schools or later have the option to transfer to their home DC public school or put their children on a wait list.

The earlier this decision is made, the more time families and staff have to make arrangements for the coming year. The worst possible outcome is to announce between March and June that a school will close at the end of June that year. Families will have missed their chance to enter the lottery and will have to scramble to find a school. If closure seems like the best option, announce the decision in the fall.

If your school is considering closure, contact My School DC as soon as possible so you can partner to make a plan that will ensure that your students have a fair shot at re-enrolling in the lottery. Consider the sample timeline for closure activities below.

Sample Timeline for Whole-School Closure

By October	November	March	June	September	November	February
School relinquishes its charter, and families and staff are notified.	School is removed from My School DC lottery. Families may enter the lottery in December.	My School DC closes. School has worked hard to ensure every student has enrolled in the lottery.	Last day of school, staff close the year.	Most closure activities are complete, estimated 1 FTE on staff, board continues to meet to oversee closure activities.	Audit conducted, perhaps 0.5 FTE on staff.	Final W-2s sent, organization dissolved, board dissolves.

Conclusion

Overseeing a charter school as a board member is incredibly difficult, complicated, and important work. It is the board's responsibility to know whether their school is on track to meet its goals and take decisive action when needed. Students across Washington, DC, depend on board members to make hard decisions that are in their best interests. FOCUS and DC PCSB stand ready to support charter school board members in analyzing data, understanding its implications, and identifying the options for moving forward to ensure DC charter school students have access to the excellent education they deserve.

Appendix

A: Review and Renewal Calendar: When is your school's next high-stakes review?

Charter reviews and renewals through 2025 - 26
 Charter reviews and renewals are conducted on a rolling basis beginning in the fall, with the goal of completing all reviews and renewals in January.

	Five-Year Review	Ten-Year Review	Fifteen-Year Renewal	Twenty-Year Review	Twenty-Five Year Review	Thirty-Year Renewal
2018-19	1. Academy of Hope PCS (P) 2. DCI (P) 3. Democracy Prep PCS (P) 4. DC Prep PCS (P) 5. Lee Montessori PCS (P)	National Collegiate Preparatory PCS	1. DC Bilingual PCS (P) 2. EL Haynes PCS (P) 3. Early Childhood Academy PCS (P) 4. City Arts and Prep PCS	1. Ideal PCS (MP) 2. Meridian PCS (P) 3. Penry Street Prep PCS (MP) 4. Roots PCS	No schools undergoing 25-year review	No schools undergoing 30-year renewal
2019-20	1. Children's Guild PCS 2. Kingsman Academy PCS 3. Landon Center PCS 4. Washington Global PCS (P)	No schools undergoing 10-year review	1. AppleTree PCS (P) 2. Early Childhood Academy PCS (P) 3. Hope Community PCS (P) 4. Howard University PCS 5. Renaissance PCS (P) 6. YoungBuild PCS	1. Capital City PCS (P) 2. Cedar Tree PCS (P) 3. DC Prep PCS (P) 4. IDEA PCS (P)	No schools undergoing 25-year review	No schools undergoing 30-year renewal
2020-21	1. Breakthrough Montessori 2. Goodwill Excel Center PCS 3. RocketShip DC PCS 4. Washington Leadership Academy PCS	1. Inspired Teaching Demonstration PCS (P) 2. Mundo Verde PCS 3. Richard Wright PCS (P) 4. Shining Stars PCS (P)	1. Briya PCS 2. Washington Latin PCS (P) 3. St. Coletta PCS	1. KIPP DC PCS 2. TMA PCS	1. Next Step PCS	No schools undergoing 30-year renewal
2021-22	No schools undergoing 5-Year Review	1. BASIS DC PCS (P) 2. DC Scholars PCS (P) 3. LAYC Career Academy PCS 4. Creative Minds PCS	No schools undergoing 15-year renewal	No schools undergoing 20-year review	No schools undergoing 25-year review	No schools undergoing 30-year renewal
2022-23	1. Digital Pioneers Academy PCS (P) 2. Straitsman Academy PCS (P) 3. The Family Place PCS (MP)	1. Community College Prep Academy PCS (MP) 2. Ingenuity Prep PCS (P) 3. Sela PCS (P)	1. Achievement Prep Academy PCS (P) 2. Center City PCS (P) 3. Washington Yu Ying PCS (P)	1. DC Prep PCS 2. Eagle Academy PCS (MP) 3. LAMB PCS (P)	1. Carlos Rosario PCS 2. César Chavez PCS (MP) 3. EW Sokolow PCS (MP) 4. Maya Angelou PCS 5. SEED PCS (P)	No schools undergoing 30-year renewal
2023-24	No schools undergoing 5-year review	1. Academy of Hope PCS (P) 2. DCI (P) 3. Harmony PCS (P) 4. Lee Montessori PCS (P)	No schools undergoing 15-year renewal	1. DC Bilingual PCS (P) 2. EL Haynes PCS 3. Two Rivers PCS (P)	1. Meridian PCS 2. Penry Street Prep PCS (MP) 3. Roots PCS	No schools undergoing 30-year renewal
2024-25	1. Capital Village PCS 2. Kingsman Academy PCS 3. Landon School PCS 4. Social Justice Project PCS 5. The Sojourner Truth School PCS	1. Children's Guild PCS 2. Kingsman Academy PCS 3. Mountaintop PCS 4. Washington Global PCS (P)	No schools undergoing 15-year renewal	1. AppleTree PCS (P) 2. Briya PCS (P) 3. Early Childhood Academy PCS (P) 4. Hope Community PCS (P) 5. Howard University PCS 6. Renaissance PCS (P) 7. YoungBuild PCS	1. Capital City PCS (P) 2. Cedar Tree PCS (P) 3. DC Prep PCS (P) 4. IDEA PCS (P)	No schools undergoing 30-year renewal
2025-26	1. LEARN PCS	1. Breakthrough Montessori 2. Goodwill Excel Center PCS 3. RocketShip DC PCS 4. Washington Leadership Academy PCS	1. Inspired Teaching Demonstration PCS (P) 2. Mundo Verde PCS 3. Richard Wright PCS (P) 4. Shining Stars PCS (P)	1. Briya PCS 2. Washington Latin PCS (P) 3. St. Coletta PCS	1. KIPP DC PCS 2. TMA PCS	1. Next Step PCS

(P) means that a school adopted the PMF as goals.

(MP) means that a school adopted a modified PMF as goals.

Updated 09/09/19

B: Introduction to Finance and Compliance Requirements in DC Public Charter Schools

DC charter schools are held accountable in three main areas: goals and academic expectations, finance requirements, and compliance requirements. The toolkit dives deeply into goals, but what are the requirements for finance and compliance? Consider the summary below, and do not hesitate to reach out to DC PCSB directly for more information.

Finance Requirements

DC PCSB must revoke the charter of a school for any of three financial reasons.

1. **The school has engaged in a pattern of non-adherence to generally accepted accounting principles.** A school should work with its auditors to ensure that it is compliant with this requirement.
2. **The school has engaged in a pattern of fiscal mismanagement.** DC PCSB occasionally cites a school for an “instance” of fiscal mismanagement. This could occur, for example, if a school is in default on a loan, or if a school that has a Financial Corrective Action Plan (FCAP) with DC PCSB misses targets on this FCAP. An accumulation of such citations would constitute a pattern. A school does not necessarily have to accumulate multiple formal citations of fiscal mismanagement to run afoul of this requirement. For example, DC PCSB revoked the charter of a school where an investigation revealed a multiyear pattern of self-dealing and enrichment by the school’s founder, among other issues.
3. **The school is no longer economically viable.** If a school is insolvent, it will be closed. DC PCSB recently revoked the charter of a school when a financial forecast showed that the school would not be able to meet payroll through the end of the school year and DC PCSB had to use its own funds to keep it from closing midyear. DC PCSB tries to anticipate schools at risk of not being economically viable by imposing an FCAP to guide the school back to fiscal health. But the primary responsibility for financial solvency lies with the school’s board, and the absence of DC PCSB imposing an FCAP does not remove the requirement of charter revocation.

DC PCSB issues a Financial Analysis Review (FAR) Report each year that shows how schools perform against certain financial metrics. A poor FAR result will not automatically lead to school closure. However, it could result in DC PCSB imposing an FCAP. Failure to adhere to the financial targets in the FCAP are considered instances of fiscal mismanagement. And deteriorating FAR results over time are certainly an indicator of concern.

Compliance

Annual compliance reports are sent to the charter school board in January or February. Additionally, OSSE sends schools compliance results throughout the year around service to students with disabilities. Each year your board should review your school’s compliance reports from both DC PCSB and OSSE. Even beyond these compliance reports, schools must broadly comply with the terms of their charters and with all applicable laws.

Failure to improve compliance issues after notices from DC PCSB and/or egregious or outright fraudulent compliance issues could be grounds for charter revocation. As noted above, compliance failures, even if remedied, are also considered by the DC PCSB board as a factor when exercising discretion over charter revocation if a school has failed to meet one or more of its goals.

C: Language from the School Reform Act re: DC PCSB Authorities in Review and Renewal Process

Review (Every 5 years)	Renewal (15 years)
<p>§ 38-1802.13. Charter revocation</p> <p>(a) Charter or law violations; failure to meet goals. — Using the record established by the eligible chartering authority, an eligible chartering authority that has granted a charter to a public charter school may revoke the charter if the eligible chartering authority determines that the school:</p> <ul style="list-style-type: none"> (1) Committed a violation of applicable law or a material violation of the conditions, terms, standards, or procedures set forth in the charter, including violations relating to the education of children with disabilities; or (2) Has failed to meet the goals and student academic achievement expectations set forth in the charter. <p>(b) Fiscal mismanagement. — An eligible chartering authority that has granted a charter to a public charter school shall revoke the charter if the eligible chartering authority determines that the school:</p> <ul style="list-style-type: none"> (1) Has engaged in a pattern of non-adherence to generally accepted accounting principles; (2) Has engaged in a pattern of fiscal mismanagement; or (3) Is no longer economically viable. 	<p>§ 38-1802.12. Charter renewal</p> <p>(b) Application for charter renewal. — In the case of a public charter school that desires to renew its charter, the Board of Trustees of the school shall file an application to renew the charter with the eligible chartering authority that granted the charter not later than 120 days nor earlier than 365 days before the expiration of the charter. The application shall contain the following:</p> <ul style="list-style-type: none"> (1) A report on the progress of the public charter school in achieving the goals, student academic achievement expectations, and other terms of the approved charter; (2) All audited financial statements for the public charter school for the preceding 4 years; and (3) The articles of incorporation and bylaws of the nonprofit corporation operating the charter school, which shall contain provisions satisfying the requirements of § 38-1802.13a. <p>(c) Approval of charter renewal application. — The eligible chartering authority that granted a charter shall approve an application to renew the charter . . . except that the eligible chartering authority shall not approve such application if the eligible chartering authority determines that:</p> <ul style="list-style-type: none"> (1) The school committed a material 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; or (2) The school failed to meet the goals and student academic achievement expectations set forth in its charter.

D: DC PCSB Charter Review Process FAQs

Please visit the DC PCSB website to review the most recent version of this document, as it is updated periodically.



Charter Review Process FAQs

What is a charter review?

A charter review is an assessment required by the School Reform Act (SRA) of a school’s academic performance, legal compliance, and fiscal management. The DC Public Charter School Board (DC PCSB) produces a review report detailing its assessment of the school in these areas, with the charter review culminating in the DC PCSB Board voting whether to continue or revoke a school’s charter.

Why does my school need to undergo a charter review?

- DC PCSB is required by the SRA to review each school **at least** once every five years.
- DC PCSB generally conducts charter reviews during each school’s fifth and tenth year in operation
- DC PCSB may perform additional reviews of schools outside of this schedule.

What does DC PCSB assess in a charter review?

The SRA requires DC PCSB to assess a school in the three areas detailed in the table below.

Areas Assessed during Charter Review	Documents PCSB will review to assess each area
The extent to which the school has met the goals and student academic achievement expectations detailed in its charter	<ul style="list-style-type: none"> - The school’s annual reports (note that the SRA requires schools to report on the extent to which they are meeting their goals and expectations in their annual report.) - The school’s PMF report (to the extent it corresponds with the school’s goals) - Accountability Plans, if applicable - Other supporting data and evidence (as requested by DC PCSB) regarding certain goals and expectations that cannot be captured using publicly available data
The school’s legal compliance , including compliance with special education laws	<ul style="list-style-type: none"> - Annual compliance reports produced by DC PCSB - Determinations and Findings forms for procurement contracts - Special Education compliance reports produced by OSSE - Any other pertinent documents, such as lawsuits, grievances, and noncompliance findings from local agencies
The school’s fiscal management, adherence to generally accepted accounting principles, and economic viability	<ul style="list-style-type: none"> - Annual audits - Any other pertinent financial documents



What are the potential outcomes of a charter review?

After reviewing the charter review report, the DC PCSB Board will vote whether to continue or revoke the school’s charter. The SRA allows the DC PCSB Board some discretion with this decision:

- If the Board finds that the school has not fully met its goals, or determines that a school has committed a material legal violation, it may **elect** to revoke the school’s charter or to instead grant it charter continuance (with or without conditions).
- However, if the Board finds the school to have a material financial insufficiency (specifically, if the school: (1) did not adhere to generally accepted accounting principles; (2) engaged in a pattern of fiscal mismanagement; or (3) is not economically viable), the Board is **required** to revoke the school’s charter.

What is the charter review process?

The steps of the review process are detailed in the table below.

Action Item	Description
Pre-review meeting	DC PCSB meets with schools that will undergo review to discuss the process
Qualitative Site Review (QSR)	<ul style="list-style-type: none"> - DC PCSB visits every school campus to observe the school’s instructional program - DC PCSB publishes a QSR report of its findings and issues it to the school - QSR report findings can be referenced by DC PCSB as evidence that the school has met its goals and expectations
DC PCSB provides a preliminary charter review report to the school	This report includes an assessment of the school’s academic performance, legal compliance, and fiscal management, and a recommendation to the Board regarding whether it should vote to continue the school’s charter.
School is invited to respond to the preliminary review report	Schools are invited to correct any factual inaccuracies and/or submit a written response to the preliminary review report before it is made public. Submitted responses will be included in the report’s appendix.
DC PCSB Board votes whether to continue the school’s charter	If possible, the DC PCSB Board will vote on the school’s continuance during a regularly scheduled board meeting.



How can a school prepare for a charter review?

1. Ensure that the school's charter is up-to-date, particularly its goals and expectations.
2. Ensure that the school has cured any points of legal noncompliance identified by DC PCSB or OSSE.

Can a school amend its charter prior to charter review?

A school may submit a petition to amend its charter at any time. The DC PCSB Board generally will not approve amendments to a school's goals and expectations unless they are submitted more than one year before the school's scheduled charter review.

DC PCSB staff contact for reviews:

Laterica Quinn, Senior Manager
School Quality and Accountability
lquinn@dcpcsb.org

E: DC PCSB Charter Renewal Process FAQs

Please visit the DC PCSB website to review the most recent version of this document, as it is updated periodically.



Charter Renewal Process FAQs

What is a charter renewal?

Every DC charter school executes a charter agreement with a term of 15 years. If a school wants to continue operating beyond these 15 years, it is required by the School Reform Act (SRA) to submit an application to the DC Public Charter School Board (DC PCSB) to renew its charter for another 15-year term. In turn, DC PCSB is required by the SRA to renew a school's charter, unless it makes a finding that the school:

- Has committed a material violation of applicable laws (including special education laws) or the terms, conditions, standards, or procedures of its charter;
- Failed to meet its goals and student academic achievement expectations;
- Did not adhere to generally accepted accounting principles;
- Engaged in a pattern of fiscal mismanagement; and/or
- Is not economically viable.

What does DC PCSB assess to decide whether to renew a school's charter?

The SRA requires DC PCSB to assess a school in the three areas detailed in the table below. A school should speak to its performance in these areas in its renewal application.

Areas Assessed during Charter Renewal	Documents DC PCSB will review to assess each area
Whether the school has met the goals and student academic achievement expectations detailed in its charter	<ul style="list-style-type: none">- The school's PMF report (to the extent it corresponds with the school's goals)- Other supporting data and evidence (as requested by DC PCSB) regarding certain goals and expectations that cannot be captured using publicly available data
The school's legal compliance , including compliance with special education laws	<ul style="list-style-type: none">- Annual compliance reports produced by DC PCSB- Special Education compliance reports produced by OSSE- Any other pertinent documents, such as law suits, grievances, and noncompliance findings from local agencies
The school's fiscal management, adherence to generally accepted accounting principles , and economic viability	<ul style="list-style-type: none">- Annual audits- Any other pertinent financial documents

When must a school submit its renewal application?

The SRA allows a school to submit a renewal application to DC PCSB between 365 and 120 days before its charter expires. **DC PCSB requests that schools submit renewal applications in the fall of their 15th year in operation to allow adequate time for the charter renewal process and so that families can participate in school lotteries in the spring if a school's charter is not renewed.**

What is the renewal process?

The steps of the renewal process are detailed in the table below.

Action Item	Description	Date
Pre-Renewal Meeting	DC PCSB meets with schools preparing for renewal to discuss the process	Spring of the school's 14th year in operation
Qualitative Site Review (QSR)	<ul style="list-style-type: none"> - DC PCSB visits every school campus to observe the school's instructional program - DC PCSB publishes a QSR report of its findings and issues it to the school - QSR report findings can be referenced by DC PCSB as evidence that the school has met its goals and expectations 	Any time during two years before the school's charter expires
Submission of renewal application	Schools will submit applications and supporting documentation electronically to Epicenter.	DC PCSB requests schools to submit it in the fall of their 15th year in operation
DC PCSB informs the school of its right to an informal renewal hearing	The SRA affords schools the right to request an informal, public renewal hearing before the DC PCSB Board.	DC PCSB must send this notice not later than 15 days after receipt of a school's renewal application.
DC PCSB provides a preliminary charter renewal report to the school	This report includes an assessment of the school's academic performance, legal compliance, and fiscal management, and a recommendation to the DC PCSB Board regarding whether it should renew the school's charter.	Contemporaneous with the notice of right to a renewal hearing
School elects whether to request a hearing	Schools can submit their request for a hearing via email.	The school must request a hearing within 15 days of receiving notice of its right to a hearing from DC PCSB
DC PCSB Board conducts the informal renewal hearing (if requested)	School leaders and board members may present any information they wish to the DC PCSB Board and should be prepared to answer questions the DC PCSB Board may have regarding their school's performance and proposed renewal.	DC PCSB Board must hold the informal hearing no later than 30 days after the school requests it.
DC PCSB Board votes whether to renew the school's charter	If possible, the DC PCSB Board will vote on the school's renewal during a regularly scheduled board meeting.	<p>If the school does not request a hearing, the vote must occur no later than 30 days after DC PCSB informed the school of its right to such a hearing.</p> <p>If the school requests a hearing, the vote must occur no later than 30 days after the date of the hearing.</p>

What are Potential Renewal Outcomes?

The DC PCSB Board may vote to:

1. Renew the school's charter for another fifteen-year term;
2. Renew the school's charter but (in the event that the performance of one or more of a school's campuses is negatively affecting the performance of the Local Education Agency) under the condition that one or more of the school's campuses that do not meet the standard for renewal be closed; or
3. Not renew the school's charter. Per the SRA, schools have the right to appeal a nonrenewal decision to "an appropriate court of the District of Columbia."

What happens after a school's charter is renewed?

DC PCSB will work with the school to update its charter agreement for the next fifteen years, including updates to its goals and academic achievement expectations. Renewed charter agreements must be executed by the time the school's initial charter agreement expires to ensure the school receives its first quarterly payments on time.

How can a school prepare for a charter renewal now?

1. Ensure that the school's charter is up-to-date, particularly its goals and expectations.
2. Begin analyzing its performance in meeting its goals and expectations and drafting the charter renewal application.
3. Ensure that the school has cured any points of legal noncompliance identified by DC PCSB or OSSE.

Can a school amend its charter, particularly its goals and expectations, prior to charter renewal?

A school may submit a petition to amend its charter. The DC PCSB Board will generally not approve amendments to a school's goals and expectations unless they are submitted more than two years before the school's charter expires.

Can I discuss the renewal process with DC PCSB staff?

DC PCSB encourages schools to plan for the renewal process well in advance, and DC PCSB staff is available to discuss the renewal process in general, or as it applies to your school.

DC PCSB staff contact for charter renewals:

Laterica (Teri) Quinn, Senior Manager
School Quality and Accountability
lquinn@dcpcsb.org

F: Looking Back: A Summary of Charter School Reviews and Renewals

It can be instructive to examine the outcomes from schools that have been up for review or renewal in previous years. The chart below examines reviews in school years 2017-18 to 2018-19. Visit the DC PCSB website at <https://dcpcsb.org/charter-school-growth-and-closures> for historical growth and closure information.

	Public Charter School	Review or Renewal	Goal Type	Continued / Renewed?	DC PCSB Reasoning	Notes
School Year 2018-2019	Academy of Hope	5-year review	Adult Education PMF	Yes	Met goals	
	DC International	5-year review	PMF	Yes	Met goals	
	Democracy Prep	5-year review	PMF	No	Failure to meet goals	Engaged in external turnaround plan October of their 5th Year, too late to demonstrate results.
	Harmony	5-year review	PMF	Yes with conditions	Improvement provision ¹	Engaged in turnaround.
	Lee Montessori	5-year review	PMF	Yes	Met goals	
	National Collegiate Prep	10-year review	Other	No	Failure to meet goals	The school was Tier 3 on the PMF for three consecutive years, and there was no significant evidence of improvement or a turnaround plan.
	DC Bilingual	15-year renewal	PMF	Yes	Met goals	
	EL Haynes	15-year renewal	Other	Yes	Met goals	
	Two Rivers	15-year renewal	PMF	Yes	Met goals	

¹ The Improvement Provision for Fifth-Year Reviews in the PMF as Goals Policy states “In cases where a school has not achieved the above threshold, the DC PCSB Board may, at its discretion, determine that a school has met its goals and student achievement expectations if the School Corporation has demonstrated consistent improvement on overall PMF scores over the four-year period. In exercising its discretion, the DC PCSB Board shall also consider the strength of un-tiered measures.”

	Public Charter School	Review or Renewal	Goal Type	Continued / Renewed?	DC PCSB Reasoning	Notes
School Year 2018-2019	City Arts and Prep	15-year renewal	PMF	No	Failure to meet goals	Because the school did not meet its 15-year goals and the law provides no discretion to DC PCSB Board at renewal, the Board had no choice but to revoke the school's charter.
	Ideal	20-year review	PMF/MS	N/A		Before the review occurred, the school's board anticipated that the DC PCSB Board would not approve its review, and proactively organized a takeover by Friendship Public Charter Schools.
	Meridian	20-year review	PMF	Yes with conditions	Improvement Provision	School engaged in external turnaround over two years before the review (June 2016).
	Perry Street Prep	20-year review	PMF/MS	Yes with conditions	Improvement Provision	School engaged in external turnaround several years ahead of the review.
	Roots	20-year review	Other	Yes with conditions	Met goals	DC PCSB Board voted to continue the school's charter with conditions to fix its compliance violations regarding the federal Individuals with Disabilities Education Act (IDEA) and procurement contracting.

	Public Charter School	Review or Renewal	Goal Type	Continued / Renewed?	DC PCSB Reasoning	Notes
School Year 2017-2018	Sustainable Futures	N/A	Other	N/A	N/A	The school's board voluntarily relinquished its charter after one year of operations because of fiscal, academic, and operational challenges.
	Washington Mathematics Science and Technology	Preparing for 20-year review	PMF	N/A	Revoked before review for being no longer economically viable	The school was up for its 20-year review in March 2018. The January 2018 DC PCSB preliminary review found the school had met its goals but that the school was insolvent. By law the DC PCSB Board was required to revoke the school's charter.
	Community College Prep Academy	5-year review	Adult Education PMF	Yes	Met Goals	
	Ingenuity Prep	5-year review	PMF	Yes	Met Goals	
	Sela	5-year review	PMF	Yes	Met Goals	
	Somerset Preparatory Academy (Now operates as KIPP DC Somerset College Preparatory Academy)	10-year review	PMF	Yes with conditions	Turnaround underway	At the December 2017 review, the DC PCSB Board determined the school was not meeting its goals, but could continue to operate with conditions, since a turnaround effort was "well underway." The school failed to meet these conditions the following year, and DC PCSB notified the school's board that it must relinquish its charter by December 2018. Anticipating this possibility, the school's board had already begun talks with KIPP:DC to takeover the school, which it was approved to do beginning in summer 2018.

	Public Charter School	Review or Renewal	Goal Type	Continued / Renewed?	DC PCSB Reasoning	Notes
School Year 2017-2018	Achievement Prep	10-year review		Yes with conditions	Met middle school goals but not elementary school goals	<p>At the November 2017 review the DC PCSB Board conditionally continued the school for the following reasons:</p> <ul style="list-style-type: none"> The elementary school campus is in its fifth year of operation. The elementary school campus, when approved, opened its enrollment to all of the boys from a closing low-performing school and simultaneously enrolled several scholars from a neighboring low performing charter school that was closing its doors. The middle school campus, while currently just 2.2 points above Tier 3, was, in the early years of this review cycle among the highest-performing charter schools in the city. <p>The elementary school had to meet specific PMF targets in 2017-18, 2018-19, and 2019-20 or it would close. It has met all of these targets.</p>
	Center City	10-year review	PMF	Yes	Met goals	
	Excel	10-year review	PMF	No	Failure to meet goals	DC PCSB closed the school, and the school's board turned the school over to DC Public Schools.

	Public Charter School	Review or Renewal	Goal Type	Continued / Renewed?	DC PCSB Reasoning	Notes
School Year 2017-2018	Washington Yu Ying	10-year review	PMF	Yes		
	DC Prep	15-year renewal	PMF	Yes		
	Eagle Academy	15-year renewal	PMF	Yes		
	LAMB	15-year renewal	PMF	Yes		
	Carlos Rosario	20-year review	Other	Yes		
	César Chavez	20-year review	PMF	Yes with conditions	Met some goals but not others	DC PCSB Board determined the school did not meet its PMF goals and did not comply with all procurement and special education regulations. The board required key conditions in order to remain open including closing one campus (aka partial turnaround + partial closure), hitting PMF targets for two campuses, and improvements to internal controls.
	EW Stokes	20-year review	PMF	Yes		
	Friendship	20-year review	PMF	Yes		
	Maya Angelou	20-year review	Other	Yes with conditions	Met some goals but not others	Conditions required each campus to meet key goals and create a corrective action plan that addresses special education compliance concerns.
SEED	20-year review	PMF	Yes with conditions	Met some goals but not others	Conditions required closing the middle school by '19-20 (aka partial turnaround + partial closure), decreasing the enrollment ceiling until retention rates improved, and meeting key academic targets.	

G: Quick Reference to DC PCSB Charter Application Guidelines, Including Goal Setting

Go to the DC PCSB website, <https://dcpcsb.org/2019-charter-application-guidelines>.

H: Sample Job Description for Ad Hoc Strategy Committee

Consider the sample job description for a charter school ad hoc strategy committee below. It will be important to tweak the language to be more specific if your school knows which path you are exploring in order to meet review/renewal goals.

The [INSERT NAME] Public Charter School Ad Hoc Strategy Committee is responsible for leading the Board of Trustees through the process of voting to choose the strategic path that will achieve two objectives:

- Ensure our students have access to the best education possible, and
- Ensure the school is taking early action to identify how we can provide that education—either by performing strongly in our current configuration, turning around our program, partially closing underperforming parts of our school, selecting a takeover operator, or closing our entire school.

The Ad Hoc Strategy Committee will achieve these goals by collecting information, drafting documents, meeting key stakeholders, and managing the process for the board to vote on a path forward that serves our students effectively.

Specifically, the Ad Hoc Strategy Committee will:

- Collect lessons learned from other schools that have gone through a similar transition.
- Draft a communications and community engagement plan for the board's input and approval and execute that plan.
- If needed, manage any Request for Proposals release or external partner selection process.
- Make a recommendation to the board. The full board will vote on the path forward.
- Play a lead role in interactions with the DC PCSB.
- [Add other specifics related to your school]

This Ad Hoc Committee will disband once the board has completed this exploration and made a decision for how to move forward.



This toolkit was prepared in collaboration between
Friends of Choice in Urban Schools and the
DC Public Charter School Board