

**From:** [Rachel Johnston](#)  
**To:** [OSSE OPCSFS Funding \(OSSE\)](#)  
**Cc:** [Ariel Johnson](#); [Tameria Lewis](#); [Anne Herr](#)  
**Subject:** Public Comment on Proposed Definition of "Significant Expansion" for CSP  
**Date:** Friday, January 6, 2023 4:58:03 PM  
**Attachments:** [Public Comment on OSSE's Proposed Changes to Charter School Programs Proposed Definition of Significant Expansion .pdf](#)

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Good afternoon,

Please find attached the DC Charter School Alliance's public comment on Proposed Definition of "Significant Expansion" for CSP.

Thank you,  
Rachel

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**Senior Director of Operations and School Support**  
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## **Public Comment on OSSE's Proposed Changes to Charter School Programs Proposed Definition of "Significant Expansion"**

The DC Charter School Alliance supports OSSE's proposed changes to the Charter School Programs (CSP) proposed definition of "significant expansion," which would lower the percentage of students and grade levels required for local education agencies (LEAs) to be eligible for the grant. We support the proposed change because it allows existing high performing charter LEAs, which have already been approved for expansion by the DC Public Charter School Board, to receive the funding they need to provide the resources for their new students to be successful. We look forward to continued engagement with OSSE to support policies that put equity at the center of everything we do, ensuring that every student in our city has the opportunity to receive a high-quality public education.

***Written by DC Charter School Alliance Senior Director of Operations and School Support  
Rachel Johnston***



Independent Research. Poverty Solutions. Better DC Government.

January 11, 2023

To: Office of the State Superintendent of Education (OSSE)  
From: DC Fiscal Policy Institute

**Re: The proposed changes to the definition of “significant expansion” in the Charter School Program Expansion Subgrant**

DCFPI urges OSSE to not change the definition of "significant expansion" at this time. The proposed change is from:

*"For the purposes of this subgrant, “significant expansion” means to increase current student enrollment (not the enrollment ceiling) by more than 50 percent or to add at least two new grade levels over the course of the grant."*

To:

*"Significant expansion" means to increase the enrollment ceiling by at least 20 percent or 100 students, whichever is fewer, or to add at least one new grade level, over the course of the two-year award period.*

The Deputy Mayor of Education (DME), Paul Kihn, has cautioned several times over the last three years that DC is heading towards a system of ‘unintentionally small schools’ resulting directly from continued school expansion and growth. The growth of the number of charter schools has nearly doubled the growth of the number of students attending charter schools in the last five years. This trajectory has contributed to an increasing number of small and under-enrolled, schools, forcing school leaders and Local Advisory School Teams to reduce or eliminate important programs and courses, disruptive shifts in instructional resources, and increased fiscal pressure on neighboring schools’ budgets – particularly schools serving predominately Black and brown students and students from families with low incomes. In future years, the harms of greater expansion may be even further exacerbated due to declining birth rates within the District.

The path of continued unchecked school growth in the District is unsustainable and the city risks harming students now and in the future with further expansion. At the very least, OSSE should wait until the DME completes and implements recommendations developed during the Master Facilities Plan and School Boundary Zone study set to be completed by the end of 2023. The DME is using these tools to specifically address concerns regarding school capacity, facility utilization, and program offerings. Changes to the expansion threshold may undermine these ongoing efforts.

**From:** [Valerie Jablow & William Horne](#)  
**To:** [OSSE OPCSFS Funding \(OSSE\)](#)  
**Cc:** [Kihn, Paul \(EOM\)](#); [Botstein, Clara \(EOM\)](#); [Griffin, Brianna \(OSSE\)](#)  
**Subject:** public comment on proposed changes in DC eligibility for CSP expansion grants  
**Date:** Sunday, January 8, 2023 4:36:26 PM

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Dear readers at OSSE,

As a DC taxpayer, I am providing comment on proposed changes in the definition of “significant expansion” for charter school eligibility for the federal government’s Charter Schools Program (CSP) expansion grants.

OSSE has proposed changing DC’s current definition for these grants of “significant expansion”—increasing current student enrollment by more than 50% or adding two or more new grade levels over the course of the 2-year award period—to this new definition:

““Significant expansion” means to increase the enrollment ceiling by at least 20 percent or 100 students, whichever is fewer, or to add at least one new grade level, over the course of the two-year award period.”

This change in definition would functionally ensure that charter schools in DC can get more money faster to expand, because the threshold to qualify for these grants would be much easier to achieve than before.

**There are many reasons that OSSE should not change the definition of "significant expansion" for these grants:**

1. First, it is unclear why OSSE is seeking to encourage expansion of charter schools in DC. As far as I can see, this grant program is not required of DC (or frankly any jurisdiction)—it is 100% optional. And DC currently has more than 35,000 unfilled seats at its existing, publicly funded schools, per the deputy mayor for education (copied above).

2. Second, the unconscionable waste of money represented by those >35,000 unfilled seats in DC decreases excellence in DC education because it affects funding. When schools endlessly proliferate—as they do in DC right now, all without a commensurate growth in student population—existing schools must make do both with decreasing enrollment AND decreasing funds to cover fixed costs.

The predictable and terrible result is that we have more LEAs than ever in DC; our test scores have not risen commensurately with that increase; fixed costs have risen while closures have become inevitable; the number of empty seats has increased; and painful budget cuts and teacher attrition are commonplace every year in many of our publicly funded schools.

As the DC state education agency, OSSE should do nothing that would further this shameful record—and encouraging charter expansion does just that.

3. Third, context for this proposed change in definition is lacking, such that the public literally

has no public information about it, which affects the quality of public comment OSSE can get.

For instance, OSSE has publicly promulgated no reason for its proposal of this new definition—and has made no public effort as far as I can see to explain the impact of such a change.

OSSE has also not made publicly clear what the historical impact of these grants is, including the extent to which these grants have been used in DC; how and for what they have been used; and how much money, if any, has been returned to the federal government because it was not awarded.

As a result, there is literally no way for the public to understand the effectiveness of these grants in DC charters—and whether the prior definition of eligibility was, in fact, adequate relative to what the money was intended for.

4. Fourth, without that publicly announced context for this changed definition of eligibility, it appears that OSSE simply wants charter schools in DC to get more money faster—period.

But the idea of this federal money is to promote education quality—not just fund charters faster (and yes, those are two different things).

5. Finally, the opportunity for public comment around this change was announced in the DC Register on December 9, 2022. But I could find nothing on OSSE's website about it.

In fact, I learned of this public comment solicitation only because an acquaintance who knows DC education very well saw the announcement in the DC Register and told another acquaintance (who also knows DC education very well but apparently did NOT see the register announcement), who then emailed me and others about it on January 2, 2023.

Not having this public comment solicitation obviously listed on OSSE's website ensures that there are people who might have commented but for the lack of a clear way to do so.

That suggests OSSE doesn't want or care about public comment but is simply using the lowest threshold for public notification—a listing in the DC Register—as proxy for meaningful public engagement on this subject.

**For all of these reasons, I urge OSSE not to change the definition of "significant expansion" for these grants AND to ensure that public information around, and solicitation of comment on, this proposal is much more widely disseminated.**

Valerie Jablow

202-997-1563

**From:** [Griffin, Brianna \(OSSE\)](#)  
**To:** [Griffin, Brianna \(OSSE\)](#)  
**Subject:** FW: Comment on Definition of Significant Expansion for the CSP Expansion Grant  
**Date:** Thursday, January 5, 2023 12:58:16 PM

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Brianna Griffin  
Manager, Office of Federal Programs and Strategic Funding  
Office of the State Superintendent of Education (OSSE)  
(202) 355-8194

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**From:** Griffin, Brianna (OSSE) <brianna.griffin@dc.gov>  
**Sent:** Thursday, January 5, 2023 12:57 PM  
**To:** Griffin, Brianna (OSSE) <brianna.griffin@dc.gov>  
**Subject:** FW: Comment on Definition of Significant Expansion for the Charter Schools Program (CSP) Expansion Grant

Brianna Griffin  
Manager, Office of Federal Programs and Strategic Funding  
Office of the State Superintendent of Education (OSSE)  
(202) 355-8194

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**From:** Laura [REDACTED]  
**Sent:** Wednesday, January 4, 2023 1:13 PM  
**To:** OSSE OPCSFS Funding (OSSE) <[opcsfs.funding@dc.gov](mailto:opcsfs.funding@dc.gov)>  
**Subject:** Comment on Definition of 'Significant Expansion' for the Charter Schools Program (CSP) Expansion Grant

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Good afternoon,

I believe that the definition for "Significant Expansion" should not be changed from its current definition until we have more information on the Facilities plan and boundary changes that will be made in the upcoming year. These kinds of policy changes can have huge net effects on our overall system and should be done after we have a better set of plans that are determined by the community and government. This policy is part of a larger ecosystem and should be based on that. I don't see any harm in waiting a year or two to change the definition.

Laura Fuchs  
DCPS Teacher  
Ward 5 Resident

**From:** [Mary Levy](#)  
**To:** [OSSE OPCSFS Funding \(OSSE\)](#)  
**Subject:** CSP Expansion Grants  
**Date:** Monday, January 2, 2023 5:09:57 PM

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It does not matter what the definition of "significant expansion" is. With thousands and thousands of unfilled seats in both charter and DCPS schools, expansion of capacity in both sectors is utterly irrational. We need to expend our resources on better, richer services at existing seats, rather than continuing to spread them ever thinner.

Mary Levy



**From:** [Suzanne Wells](#)  
**To:** [OSSE OPCSFS Funding \(OSSE\)](#)  
**Cc:** [Mendelson, Phil \(COUNCIL\)](#); [Nadeau Brianne K. \(Council\)](#); [bpinto@dccouncil.gov](#); [mfrumin@dccouncil.gov](#); [jlewisgeorge@dccouncil.gov](#); [zparker@dccouncil.gov](#); [Allen, Charles \(COUNCIL\)](#); [Gray Vincent \(Council\)](#); [twhite@dccouncil.gov](#); [abonds@dccouncil.gov](#); [Councilmember Kenyan R. McDuffle](#); [Kihn, Paul \(EOM\)](#)  
**Subject:** Comments on Definition of Significant Expansion  
**Date:** Friday, January 6, 2023 6:13:06 AM  
**Attachments:** [DME Charter Application Needs Analysis 2020.pdf](#)

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Dear Office of Public Charter School Funding and Support, OSSE,

This comment is being submitted regarding the change in definition OSSE intends to adopt for determining “significant expansion” when determining the eligibility of public charter schools applying for a Charter Schools Program (CSP) Expansion Grant.

OSSE intends to change the definition of “significant expansion” from

*“For the purposes of this subgrant, “significant expansion” means to increase current student enrollment (not the enrollment ceiling) by more than 50 percent or to add at least two new grade levels over the course of the grant.”*

to

*“For the purposes of this subgrant, “significant expansion” means to increase the enrollment ceiling by at least 20 percent or 100 students, whichever is fewer, or to add at least one new grade level, over the course of the two-year award period.”*

In its Request for Public Comment, OSSE provides no explanation of why it is proposing to make these changes to the ‘significant expansion’ definition, and it does not explain the impact these changes are expected to have in the award of CSP Expansion Grants. As a public agency, OSSE should explain why it is proposing to make what appear to be significant changes to its “significant expansion” definition.

**I urge OSSE not to change the definition of "significant expansion" at this time.** The District of Columbia currently has 69 Local Education Agencies, and 248 schools. The Deputy Mayor for Education has raised concerns about the number schools operating with relatively small enrollment because small schools bring relatively high fixed costs (see attached). In DC, there is overcapacity in the number of seats currently available compared to the number of students, and the existing schools are competing for a relatively limited number of students especially at the middle and high school level. Reducing the threshold for expansion at this time as the city wrestles with more capacity than students is unfair to all existing schools and students, and does not make sense from a public policy or fiscal responsibility perspective.

The Deputy Mayor for Education will be gathering input and then submitting an Education Master Facilities Plan (MFP) this calendar year. The MFP and Boundary review process will

be looking closely at quality and capacity. Any proposed change on expansion should be informed by this work which is expected to be completed by December 2023. The work by OSSE and the State Board of Education on changes to the school report card and the way we define quality will also be able to inform any further decision on what should be considered significant charter expansion eligible for this grant.

Sincerely,

Suzanne Wells, President  
Ward 6 Public Schools Parent Organization

## MEMORANDUM

**TO:** Board Members of the DC Public Charter School Board

**FROM:** Paul Kihn, Deputy Mayor for Education

**CC:** Scott Pearson, Executive Director of the DC Public Charter School Board

**DATE:** March 12, 2020

**SUBJECT:** 2020 Charter Application Need Analysis

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At the current moment, our city is experiencing extraordinary uncertainty and anxiety. The presence of COVID-19 (coronavirus) in our community has caused our schools to shift energy and urgent attention to actions and planning designed to keep students, teachers and staff safe, including the possibility of unprecedented school closures to contain the spread of the virus. I am deeply grateful to all the charter school leaders, and the staff and Board members of the Public Charter School Board, for their (and your) planning work, and their (and your) collaboration as we tackle big, new challenges together.

At the same time, we also know we have to keep the long-term needs of our families and our public school system in mind as we make significant decisions. It is our understanding that you are still planning to vote on new charter school approvals on Monday, March 16. Because of this, we are conveying this memo in a spirit of collaborative input into that decision – with the humble acknowledgment that much of our attention and work, most of our thoughts and prayers, are currently consumed with matters of public and school-community health.

\* \* \* \* \*

In 2020, Washington, DC has one of the most sophisticated and well-regarded system of schools in the nation. We are seeing gains in enrollment, student achievement, and family satisfaction driven by both our by-right schools and citywide schools. Public charter schools provide our students and families with strong additional school options and offer unique and innovative programming. Our choice schools, inclusive of citywide DC Public Schools (DCPS) and all charter schools, play an important role in complementing our by-right neighborhood schools.

Now, our goal is to ensure we continue building a cohesive system of high-quality schools that works for all students and families. To help us do that, in June 2019, the Office of the Deputy Mayor for Education launched EdScape, a set of public interactive visualizations and downloadable datasets to inform and support program and school planning in Washington, DC. The purpose of the analysis in this memo is to use the data and information in EdScape, as well as the recently released [Master](#)



[Facilities Plan \(MFP\) 2018](#) and [MFP Supplement 2019](#),<sup>1</sup> to inform school planning decisions, like now as you prepare to vote on the new charter school applications in March 2020.

In addition to the analysis below, I want to be clear that we continue to be concerned that our school system is tipping too heavily towards a large number of unintentionally “small schools.” Our concern is based on the understanding that resources and facilities are finite, and that in duplicating costs and stretching resources too thin, we are ultimately doing a disservice to our students, families, and existing schools.

At the same time, an ongoing analysis of our system does suggest that we will likely need additional school capacity and programming over the coming decade in particular parts of the city, both to meet demand and ensure we are preparing all students for post-secondary success. While our existing schools continue to improve – and improvement at existing schools is by far our collective priority – our ask is that you consider how the proposed new schools fit into and complement the existing education school landscape.

We are proud to be your partner in this work. We have consulted with DC PCSB staff in the development of the analysis, and we look forward to even closer collaboration among DC PCSB, DCPS, charter LEAs, and OSSE moving forward.

### **Summary of Charter School Applicants**

As you are aware, four operators submitted applications to become new public charter schools in SY21-22. These include two elementary school dual language programs: one offering Mandarin and Spanish that is interested in locating in Wards 7 or 8; and one offering Arabic that is interested in locating in Ward 6 (or, alternatively, Wards 1, 4, or 5). These elementary schools are requesting enrollment ceilings of 525 and 544 students, respectively. There are also two secondary school applicants: an inquiry-based learning immersion middle school/high school (grades 6 through 12) interested in locating in Ward 6 with a proposed enrollment ceiling of 700 seats, and a business and entrepreneurship model high school (grades 9 through 12) interested in locating in Ward 8 with a proposed enrollment ceiling of 410 students.

### **Considerations**

#### Dual Language Elementary Schools

Determining whether the public school system needs more elementary schools or dual language elementary schools in Wards 6, 7, and 8 is not clear cut.

Currently, Wards 6, 7, and 8 have an excess amount of elementary school capacity, with approximately 622, 1,400, and 1,800 unfilled seats in each ward, respectively. Of these unfilled seats, more than two-thirds are in 3, 4, or 5 STAR elementary schools with 416 seats in Ward 6, 492 seats in

<sup>1</sup> The DME relied on the most recent, publicly-available data for this analysis including SY18-19 audited student enrollment at the school facility or campus level, SY18-19 facility programmatic capacities, the location of dual language programs as of SY19-20 (found on DME’s website), and a 2019 My School DC application analysis. Grades and grade levels are based on the Uniform per Student Funding Formula designations in the audited enrollment files.

Ward 7, and 524 seats in Ward 8. Opening any new elementary school in these wards could exacerbate enrollment stressors and hamper robust school programs already in place. Conversely, new schools may help relieve instances where schools are on the edge of overcrowding, particularly in Ward 6, but there are far fewer of those instances. Even taking forecasted population growth into account, excess DCPS elementary space is still anticipated in Wards 7 and 8 (with estimated surpluses of over 1,500 elementary school seats in each ward). Furthermore, existing public charter LEAs (located across the city) are approved to add an additional 3,500 elementary seats based on their existing enrollment ceilings that could be added in those wards as well. If we assume that only 80% of the enrollment ceilings would be actualized, this results in a little more than 2,800 more public elementary charter seats that could be used to address any future overcrowding due to forecasted population growth.

I have mentioned my concern around having too many “small schools” in our system. It is worth noting that of the 100 schools in our community with fewer than 300 students, nearly a quarter (23%) are elementary schools located in Wards 6, 7, and 8. Again, the concern is that resources end up being spread too thin, to the detriment of the students and educators in these schools.

From a programmatic perspective, Wards 6 and 7 have only three dual language programs (one in Ward 6 and two in Ward 7) and there are no dual language programs in Ward 8. This means students and families in these wards need to travel farther should they enroll in the existing dual language programs located in Wards 1, 4, and 5. For instance, elementary students living in Wards 7 and 8 and attending dual language schools (anywhere in the city) travel a median distance of 4 miles; elementary students living in Wards 7 and 8 attending non-dual language schools (anywhere in the city) travel a median distance of 1.4 miles. Opening new dual language schools in Wards 6, 7, or 8 could provide families living in these wards with program options that are located closer to their homes.

However, it should not be a foregone conclusion that offering a dual language program will result in enough interested students to have a viable school. Recent My School DC [analysis](#) shows that the demand for the existing Spanish programs in the dual language schools located in Wards 6 and 7 are relatively low compared to the Spanish programs located in other parts of the city, and demand for languages other than Spanish is typically lower than Spanish-speaking programs.

### Secondary Programs

The analysis of the secondary programs is more definitive. The amount of unfilled seats in our public high schools continues to be substantial – there are approximately 3,600 unfilled seats in high schools and another 1,400 to 1,500 unfilled seats in secondary education campuses serving grades 6-12. Of the unfilled high school seats, 780 are at 3, 4, or 5 STAR schools (44% of these 3+ STAR high school seats are located in Ward 5).

To the issue of unintentionally small schools, of the 10 high schools that enroll fewer than 300 students, 70% are located in Wards 6, 7, and 8 (two in Ward 6, two in Ward 7, and three in Ward 8). Further, both of the small secondary education campuses are also located in these wards (one in Ward 6 and one in Ward 7).

It is also very important to note that up to 850 new high-performing seats will be added to the public high school supply over the next two years, and as many as 600 of those seats will be in Wards 7 or 8. This calls into question the need to add more high school seats at this time, particularly seats in new



schools that do not purport to solve specific needs. Some stakeholders believe that additional innovative programs will entice more families to enroll in public high schools but we do not have sufficient evidence to make this assumption. From a citywide perspective, this becomes a trade-off between investing in new and untested models – with the associated enrollment effects on other secondary schools – or investing in improvements, expansions, or replications of existing secondary schools.

The attached appendices provide a detailed analysis supporting this summary.



## APPENDICES

## Appendix 1: Dual Language Elementary School Need Analysis

### *Facility Capacity Analysis*

Determining whether the public school system needs more dual language elementary schools in Wards 6, 7, and 8 is not clear cut. From a facility capacity perspective, there are excess elementary school seats that are already available for students.<sup>2</sup> As of SY18-19 (the most recent audited enrollment data available), there are approximately 1,400 and 1,800 unfilled seats in Wards 7 and 8 schools serving primarily PK through 4<sup>th</sup> or 5<sup>th</sup> grades, respectively, and one additional new public charter school expected to open next year in Ward 7 as well (planning on enrolling 110 students in its first year). In Ward 6, there are 622 unfilled elementary school seats.<sup>3</sup> This does not include those schools with unfilled elementary space in primary education campuses (those offering PK through 8<sup>th</sup> grade) (see Appendix Table 1). Most of the unfilled seats in Wards 6, 7, and 8 are located in DCPS elementary schools (88% of the approximately 3,800 unfilled seats in those wards).

The unfilled seat analysis relies on facility programmatic capacity, which for specific LEAs may be higher than the LEA's enrollment ceiling. The DC PCSB calculates "true capacity" that relies on whichever of the two metrics are lowest (an LEA's enrollment ceiling or total LEA facility capacity). Taking PCSB's methodology of "true capacity" into account, the unfilled seats citywide are reduced from 20,766 seats to 19,200 seats. The challenge of relying on enrollment ceilings when looking at information by grade level and location of the school is that enrollment ceilings are for an entire LEA and if an LEA has multiple schools offering different grade levels or are located in different parts of the city then enrollment ceilings cannot be disaggregated to account for this. The DME reported unfilled seats by true capacity where possible and we look forward to working with PCSB to determine if there are ways to use true capacities for multi-school LEAs in the future.

In SY18-19, there are 100 school campuses with fewer than 300 students out of a total of 255 school campuses. Of those 100 small schools, 44 are elementary, 20 are middle schools, 10 are high schools, 10 are education campuses (either primary or secondary), and the remaining 16 are adult, alternative, or exclusively special education schools. Of the 44 elementary schools across the city that have an enrollment of fewer than 300 students, 23 of those schools are in Wards 6, 7, and 8 at five, nine, and nine schools, respectively. Eight additional primary education campuses are considered small, with three located in the target wards.

Taking Office of Planning (OP) ages 3 to 17 population forecasts into account in the SY23-24 DCPS enrollment projections (provided in the 2019 MFP supplement) as well as the anticipated future DCPS facility capacity (included budgeted modernizations), DCPS elementary schools in aggregate will

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<sup>2</sup> For this analysis, we relied on "unfilled seats," which measures the number of available seats by subtracting audited enrollment from a facility's programmatic capacity. Schools that are overcrowded do not count as negative "unfilled seats," but are set to zero. Schools that have not reached their maximum grade span have been excluded since their excess space may be filled as they open new grades. Portable DCPS capacity has also been excluded. Unfilled seats differ by another measure, "absolute gap." The absolute gap allows overcrowded schools to be negative, which offsets any additional excess seats in surrounding schools.

<sup>3</sup> In SY18-19, several DCPS schools were undergoing modernization and did not have a reported programmatic capacity for that school year. For purposes of this analysis, the last known capacity was used for those schools.

continue to have a surplus of unfilled seats, potentially as many as 5,500. However, pressures vary across the city: in Wards 2, 3, and 4 there may be either not enough or very few surplus DCPS elementary seats, and in Wards 7 and 8 there will continue to be surpluses of over 1,500 seats each, if current enrollment patterns persist. The estimated number of excess additional seats in Ward 6 is estimated at approximately 500 seats.

To understand how much more the public charter sector could grow without amending their current charter agreements, we use approved enrollment ceilings out to SY2023-24. Again, enrollment ceilings apply to the LEA and are not disaggregated by grade spans or by a specific geography; therefore, we are unable to provide the specific enrollment ceilings at just the elementary school level or for the wards of interest. However, a LEAs enrollment ceiling can be broken out proportional to their grade level enrollment. Using this methodology and looking out to SY23-24, the existing public charter LEAs have approved enrollment ceilings estimated to be approximately 31,212 elementary seats which is 3,565 seats above the SY19-20 charter enrollment ceiling (see Appendix Table 2). Even if we assume that only 80% of the enrollment ceilings would be actualized, this results in 2,852 more elementary public charter seats that could be used to address the increased 3 to 10 year old population.

### *Quality Analysis*

Some believe that the existence of unused space is not a compelling argument when students are enrolled in lower quality schools. We do know that a greater number and share of students going to school in Wards 7 and 8 are enrolled in the lowest-rated schools, STAR 1 and 2 per OSSE's school rating system. For instance, 2,969 elementary school students are enrolled in 1 and 2 STAR schools in Ward 7 (or 38% of all elementary school students going to school in Ward 7), and another 5,460 elementary school students are enrolled at 1 and 2 STAR schools in Ward 8 (or 51% of all elementary students going to school in Ward 8).<sup>4</sup>

But it is worth noting that of the 6,880 unfilled DCPS and public charter elementary seats in the city, 45% of them are in elementary schools rated 3, 4, or 5 in the STAR ratings (referred to as 3+ STAR). That is, there are 3,089 available elementary seats in 3+ STAR rated schools. Of that citywide number, 1,432 seats are available in Wards 6, 7, and 8 at 416, 492, and 524 seats, respectively.<sup>5</sup> These opportunities offset some of the need from an exclusively quality perspective.

Some stakeholders have pointed out that the unfilled seats in 3+ STAR schools may reflect the fact that families and students made enrollment decisions based on the school's previous STAR ratings. As we showed in an [Edsight](#), 20 more schools in SY18-19 were rated as either a 4 or 5 STAR school compared to the year prior. We look forward to reanalyzing the unfilled seats in the future to see if the number of unfilled seats decreases.

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<sup>4</sup> Enrollment in 1 STAR and 2 STAR rated schools and total enrollment in Wards 7 and 8 include all elementary students and is not restricted by facility type or whether a school has not reached their maximum grade span.

<sup>5</sup> Some of these unfilled seats may reflect a school's policy to not enroll past a particular grade (e.g., some dual language programs do not enroll in later grades).

### *Family Demand Analysis*

The third perspective to consider is that the two elementary school applicants are offering dual language programs. In SY19-20, the 17 dual language programs offering elementary grades were largely concentrated in 21 facilities across Wards 1, 4, and 5, which is also approximately [where the most English learner students live](#). The majority of the dual language programs offered thus far are primarily Spanish. Of the 17 school facilities, 15 offer Spanish, two offer French, one offers Chinese, and one offers Hebrew.<sup>6</sup>

There are just three existing dual language programs in the wards where the applicants are prioritizing locating: one in Ward 6, two in Ward 7, and none in Ward 8. Two offer Spanish and the third offers Spanish and French. Therefore, students who live in these parts of the city have fewer nearby dual language options than their peers in other parts of the city and have to travel longer distances to attend dual language programs. In SY18-19, Ward 7 and Ward 8 elementary students attending dual language schools (anywhere in the city) travel nearly three times farther in walking distance than those Ward 7 and 8 elementary students attending non-dual language schools (anywhere in the city) at 4.0 miles compared to 1.4 miles, respectively.

Anecdotally, dual language programs are considered to be in high demand by parents (this sentiment is reported at community meetings), and this seems to be supported by some dual language schools' long waitlists. However, waitlists in and of themselves are not a definitive expression of absolute demand; as we wrote in a recent [Edsight](#), a little more than half of families offered a match at the time of the lottery or a placement off of a waitlist accepted.

In addition, the My School DC (MSDC) team recently released an [analysis](#) showing more nuanced findings based on how highly students rank the dual language schools compared to other non-dual language schools on their lists. They found that demand for dual languages varies depending on the school, location, and grade level. And, approximately half of the time, those interested in dual language programs ranked a non-dual language school over a dual language school meaning that they preferred the non-dual language program more.

Another consideration is the type of language offered. We do not have any quantitative information about the demand for languages such as Arabic, but looking at the other programs that offer a language other than Spanish, the range of demand varies significantly. The MSDC [analysis](#) shows that the number of applications per PK3 seat offered in the common lottery for each of the non-Spanish dual language programs (regardless of the ranking order) varies widely: from two applications per PK3 seat offered for the Hebrew program to 25 applications per PK3 seat offered for the Ward 5 location of the French program. The number of applications for the new campus of the French program in Ward 7 was almost 5 applications per PK3 seat offered. Given the analysis, it should not be a foregone conclusion that offering a dual language program will result in enough interested students to have a viable school given that demand for languages other than Spanish is typically lower than Spanish-speaking language programs.

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<sup>6</sup> The sum of individual elementary school programs by language offered is greater than 21 because some schools offer more than one language.

## Appendix 2: Secondary School Need Analysis

The analysis is more definitive regarding secondary programs. The other two operators submitted applications to open secondary campuses, one with grades 6 through 12 prioritizing Ward 6, and a stand-alone high school offering grades 9 through 12 potentially in Ward 8. Similar to our analysis submitted last year, the amount of unfilled seats at the secondary level continues to be substantial – there are 3,642 unfilled seats in high schools alone and another 1,490 unfilled seats in secondary education campuses (or those offering 6<sup>th</sup> through 12<sup>th</sup> grades). (The number of unfilled seats in secondary education campuses is lowered to about 1,370 if we use the PCSB’s method of taking the lower LEA enrollment ceiling into account rather than the higher facility programmatic capacity for one public charter school.) The majority of the unfilled seats at the high school level are in DCPS schools, with 3,188 of the seats (or 88%) located in DCPS high schools. The number of unfilled seats in secondary education campuses is shared fairly evenly between DCPS and charter schools. At the ward level, Wards 8, 5, and 6 had the most unfilled high school seats at 905 seats, 875 seats, and 647 seats, respectively. Wards 2 and 3 are the two areas of the city where unfilled high seats are very low – they total to less than 100 seats each.

Of the ten high schools that enroll fewer than 300 students, over two-thirds are located in Wards 6, 7, and 8 with two schools located in Ward 6, two in Ward 7, and three in Ward 8. Further, both of the small secondary education campuses are located in these wards, with one in Ward 6 and one in Ward 7.

Focusing on just the standalone high schools, the majority of unfilled seats in high schools are rated as 1 or 2 STARs – a total of 2,800 seats while another 780 unfilled seats are in high schools rated 3+ STAR. Many of these unfilled 3+ STAR seats are in Ward 5 at 345 seats. In addition, Ward 6 has 99 unused 3+ STAR high school seats and Ward 7 has 47 unused 3+ STAR high school seats. Ward 8 has only 18 unused 3+ STAR high school seats. See Appendix Table 1 for more details.

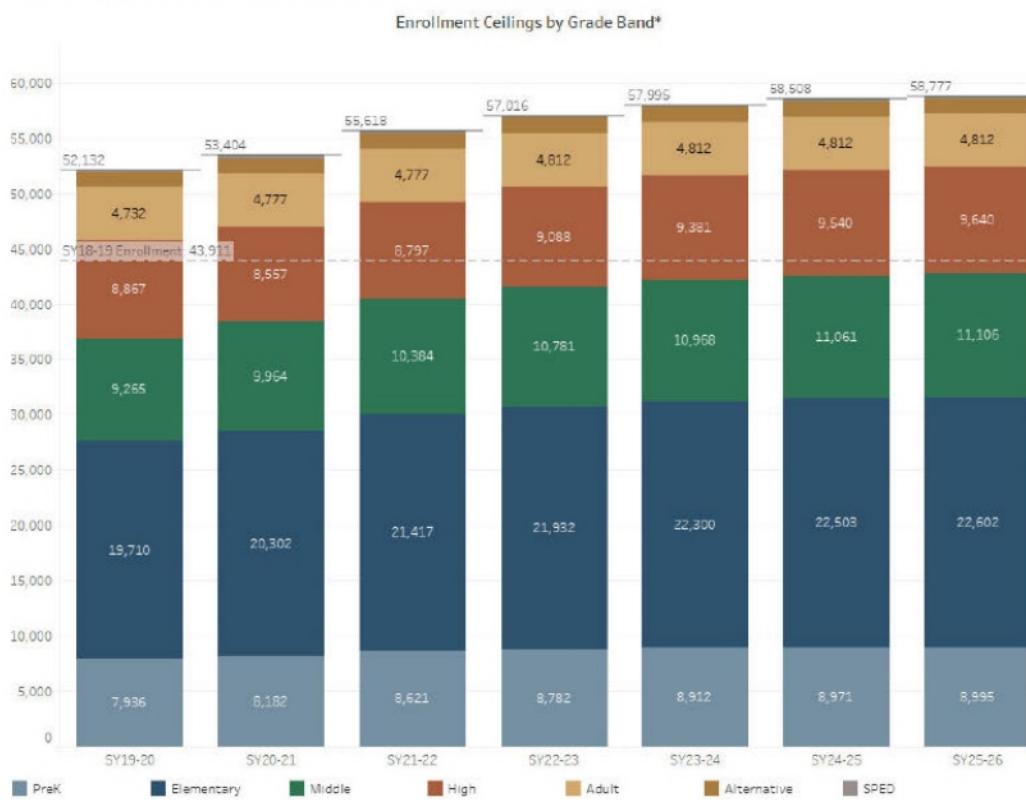
We also have to remember that additional high school capacity is on the horizon for schools with recognized strong performance: Bard HS will open their remaining 10<sup>th</sup> and 12<sup>th</sup> grades this coming school year, KIPP DC is planning on opening a new high school located in the former Ferebee-Hope building targeted to open in the next few years, and Banneker HS’s new modernized building will hold an additional 300 students as of SY22-23. This will add as many as 850 high-performing seats to our public high school supply in the next two years, and as many as 600 will be in Wards 7 and 8. This additional expected high school capacity does not include Girls Global Academy PCS, a new all-girls high school opening in Ward 2 next year, which could have capacity for as many as 300 additional students. Conversely, we should remember that this influx of new seats will be offset by the closure of National Collegiate Preparatory PCS in June 2020, which will remove 300 low-performing seats from the high school supply. Some believe that the opening of additional innovative programs and schools will spur family investment in public high schools but we do not have sufficient evidence at this point to make this assumption. From a citywide perspective, this becomes a trade-off between investing in new, potentially innovative, yet untested models – with the associated enrollment effects on other secondary schools – or investing in improvements, expansions, or replications of existing secondary schools.

**Appendix Table 1: Citywide Unfilled Seats by STAR Rating as of SY18-19**

| School Grade Band Based on UPSFF Enrollment | Total         | 3+ STAR      | 1 & 2 STAR    | Multi-STAR | No STAR      |
|---|---------------|--------------|---------------|------------|--------------|
| Elementary                                  | 6,880         | 3,089        | 3,436         | -          | 355          |
| Middle                                      | 3,582         | 1,078        | 2,504         | -          | -            |
| High  | 3,642         | 780          | 2,800         | -          | 62           |
| Primary Education Campus                    | 3,604         | 1,814        | 1,744         | 46         | -            |
| Secondary Education Campus                  | 1,490         | 409          | 785           | 296        | -            |
| Elementary through High                     | 22            | 22           | -             | -          | -            |
| Multiple Grade Bands                        | 670           | 345          | 200           | 125        | -            |
| Adult/Alt/Special education schools         | 876           | n/a          | n/a           | n/a        | 876          |
| <b>Total</b>                                | <b>20,766</b> | <b>7,537</b> | <b>11,469</b> | <b>467</b> | <b>1,293</b> |

**Definitions:**

- **Multiple Grade Bands:** collocated facilities (or facilities with more than 1 LEA) where the grades offered span multiple grade bands (i.e. PK3-5<sup>th</sup> and 9<sup>th</sup>-12<sup>th</sup>).
- **Multi-STAR:** facilities with multiple schools with different STAR ratings that could not be grouped into either 4 & 5 STAR or 1 & 2 STAR.
- **No STAR:** Facilities with schools that did not receive a rating as part of the OSSE STAR Framework because they were either a new school, had a particular grade configuration that is not rated, or their enrollment was too small.

**Appendix Table 2: Approved Potential New Public Charter Seats from SY19-20 Enrollment Ceilings Estimated by Grade Band**


\* Enrollment ceilings broken out by grade band proportional to SY19-20 projections (same methodology PCSB used)

**From:** [REDACTED]  
**To:** [OSSE OPCSFS Funding \(OSSE\)](#)  
**Subject:** Charter School Expansion Through Definition Change  
**Date:** Thursday, January 5, 2023 12:33:15 PM

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To Whom It May Concern at OSSE:

My name is Mark Simon. I have been an active parent and LSAT member in four DCPS schools over the past 30 years. I have supported and advocated for a real Master Facilities Plan at least since 2007, when DC's ability to have a plan and to promote equity across the city declined with the advent of an approach that allowed for 64 LEAs and almost half our schools to operate as if they are small businesses without a connection to the school system as a whole.

I urge you not to change the definition of school expansion as proposed. It would deepen the problem of each school being able to make decisions to expand regardless of the impact on neighboring schools or the school system as a whole. Actually, the opposite is needed. A real master facilities plan is what we need and this definition change works against having a master plan.

Presently, we have a problem of underutilization of facilities, across both sectors and all LEAs. That means that any school that expands the number of grades or students, without consideration of an actual master plan will make the problem worse. It contributes to waste of taxpayer dollars and inefficiency. I urge you to take a look at the excellent work the 21st Century Schools Fund did in the early 2000's on the inequities that were created by not having a real Master Facilities Plan. They developed real expertise in how to study this issue and the kind of solutions that are needed.

A system of neighborhood schools is needed and must be central to any real master plan. Opening, closing and expansion of schools, willy nilly, without consideration of that master plan is a problem. So I urge you, if you're going to use the term Master Facilities Plan and are serious about creating one, not to at the same time take an action that undermines the concept of actually building one. It would be the height of hypocrisy.

— Mark Simon  
[REDACTED]

**From:** [Cathy Reilly](#)  
**To:** [OSSE OPCSFS Funding \(OSSE\)](#)  
**Subject:** Charter School Expansion Definition change comment  
**Date:** Wednesday, January 4, 2023 3:09:12 PM

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To: OSSE on proposed change

This comment is to be considered regarding the proposed definition change for determining eligibility of public charter schools for a Charter School Program Expansion Grant.

I urge OSSE not to change the definition of "significant expansion" at this time. The proposed change is from

*"For the purposes of this subgrant, "significant expansion" means to increase current student enrollment (not the enrollment ceiling) by more than 50 percent or to add at least two new grade levels over the course of the grant."*

to

*"Significant expansion" means to increase the enrollment ceiling by at least 20 percent or 100 students, whichever is fewer, or to add at least one new grade level, over the course of the two-year award period.*

The Deputy Mayor for Education will be gathering input and then submitting an Education Master Facilities Plan this calendar year. We currently have 69 Local education agencies and 248 schools. The number of small schools in both sectors has meant reduced programming and reduced enrichment at many campuses. Reducing the threshold for expansion at this time as the city wrestles with more capacity than students is unfair to all existing schools and students.

The MFP and Boundary review process will be looking closely at quality and capacity. Any proposed change on expansion should wait until this work is completed (December 2023). The work by OSSE and the SBOE on changes to the report card and the way we define quality will also be able to inform any further decision on charter expansion through this grant. There is a 5 year window for these subgrants so the time can be taken to

get this right.

THank you,

Cathy Reilly

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S.H.A.P.P.E.

Senior High Alliance of Parents, Principals and Educators

Cathy Reilly - Executive Director

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