

## **Proposed Philadelphia School District Charter School Authorizing Policy**

### **Testimony from Public Citizens for Children and Youth**

**Submitted to the Philadelphia School Reform Commission March 19, 2014**

We commend the leaders of the District for crafting a thoughtful and comprehensive draft set of policies for the Authorizing Quality Initiative. It's especially useful that the District has crafted a policy that is reflective of the lessons learned over nearly 20 years of this work in Philadelphia. We believe that the policy moves toward a balanced approach that deploys the District authority's and resources in ways that put the needs of students first while recognizing the real organizational demands that both charters and the District face in their efforts to deliver a high quality learning environment for all of our students.

The District's approach for reviewing the academic, as well as fiscal, implications of authorizing charters shows a maturing of the review process and demonstrates a strong commitment to all students and to the prudent management of public resources.

We recommend that the final policy include explicit language that makes clear that the approval of new or renew charters must be based on the needs of all students enrolled in public schools and that new charter seats will be identified from the pool of seats generated by non-renewal, revocation or termination of failing charters. It is from these seats only that new charter seats can be made available to meet the needs of students in buildings that are overcrowded, where the District is seeking a charter to meet the needs of a special population of students and/or where Renaissance charter schools are considered optimal.

Further, while the policy clearly states that the Charter School Office will establish metrics, the vision for the policy could be improved by explicitly defining "high quality." An option would be to include language that reads, "High quality charters offer students a rigorous academic program that has demonstrable impact on student learning gains for all students enrolled." Likewise, the vision should explicitly state that the SRC is committed to ensuring all charters are open and welcoming to all students. As such, the vision statement could be clearer by stating that, "Charters authorized by the SRC shall have student bodies that reflect the diversity of students enrolled in the Philadelphia School District and that no charter has illegal or inappropriate barriers to enrollment."

We strongly support the language that reads, "Consistent with its mission to allocate limited financial resources to all schools in Philadelphia, the SRC shall consider the financial impact of any application to create a new charter." We also strongly support the language that reads, "The SRC may establish a preference for applicants proposing new charter schools that have a limited financial impact on the district through the applicant's proposed use of district resources, proposed recruitment of students from a District defined catchment area or other proposed cost savings to the District."

We are pleased for new charters the policy depends on the explicit "competitive preferences." While this sort of transparency is welcome, to ensure high quality charters are created to meet the preferences, it may be more prudent to establish the competitive preferences every two years so that external providers have time to put quality plans together to respond to those preferences and to ensure that there is thoughtful, long-range planning within the District to craft preferences in ways that respond to real student needs.

Finally we see this policy as the next step in creating a productive partnership between the charter school infrastructure and the District. To help build this partnership we suggest that the policy include explicit expectations of the District so that charters have clear, reasonable and enforceable expectations. We would suggest the inclusion of language such as timely release of school district payments to charters, a commitment to maintain consistent reporting requirements of the life of the charter, timely review of problems with the charter and reasonably quick decisions on the part of the district to solve charter payment and enrollment issues.

We note that the policy does not describe interim measures that can be imposed on charters where there is evidence of low performance. We recommend that the final policy include interim actions that can be taken to ensure that low performing charters improve so that revocation or termination can be avoided.

We believe that the District must make the decision about conversion to another charter or a district-run school based in part on the capacity of district-run or other charters schools that serve the same grade span, as well as by considering the closing charter's location. Given that there are many factors to consider, and each case will be different, we strongly urge the CSO to create a standardized decision-making matrix that guides how to handle the transfer of students enrolled in a closing charter.

With respect to charter expansion requests, we recommend that the CFO prepare a five year financial projection of the costs and present alternative cost effective scenarios for consideration by the SRC.

Further to the degree the District believes it is fiscally prudent to expand charter enrollment, it should make that decision every two years so that charter operators can be responsive and carefully plan for such expansion. We also believe that a two year process can ensure a more thorough review of applicants and expansion of the monitoring capacity needed to oversee charters.

We suggest that the SRC and CSO consider the adoption of a policy that ensures that when expansion requests are being considered and are fiscally possible, priority consideration be given to requests by charters seeking to expand their grade spans, if they are high performing and have a student body reflective of the concentration of at-risk students in the District. Research shows that most students do not handle transitions well, so efforts to decrease transitions and shifts in educational approaches can have a positive effect on students and should be considered an important system improvement in the overall operation of the District/Charter partnership.

We commend the District for being explicit about the urgent need to improve performance in under-performing District-run schools. We believe the Renaissance Charter model may be an effective model to employ in these circumstances; however, not every Renaissance Charter has shown the rate of desired or needed improvement. Meanwhile, research also demonstrates that the original Promise Academies model made impressive gains in student achievement in the early years of implementation when the model was fully supported and funded. As such, we believe that the preamble in this section should explicitly state that both charter and District-run models can be employed to turn around failing District schools.

Finally, we commend the approach to addressing barriers to entry in charters and strongly support the policy as drafted. We believe this section could be strengthened by directing the CSO to identify charters with student bodies that are significantly more advantaged than the overall District, and charge the CSO to develop a corrective action plan with each charter that needs one so that over a reasonable period of time every charter has a student body that is appropriately reflective of the district's student body.