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**COALITION FOR DC PUBLIC SCHOOLS & COMMUNITIEs**

Dear Members of the Student Assignment Advisory Committee of 2023-2024,

As we come to the last few meetings of the Student Assignment Advisory Committee, we have suggestions for the recommendations that will come from the Systems Level discussion which could potentially provide more clarity and coordination around school openings and expansions. We would like to see these seriously considered by the full committee for inclusion in the recommendations.

Specifically, the advisory committee is tasked as noted in DC Law 20-61; D.C. Official Code § 38-221 with ensuring adequate capacity to guarantee the right to attend DCPS schools at each grade level, taking current and future population and enrollment trends into account**.**

Strengthening programming opportunities and safe spaces in all eight wards to the standard seen at DCPS schools in the northern and western neighborhoods will support stronger enrollment in the DCPS neighborhood schools. The investment has to come first. Citywide charter and DCPS schools were meant to enhance not weaken the DCPS schools of right. It is time to restore the balance and prioritize the DCPS neighborhood schools primarily in wards 5, 7 and 8.

Even if the excess capacity in the DCPS schools in the eastern neighborhoods were all utilized, it is still inadequate to meet population needs. The task is to fulfill the guarantee of the right to attend a DCPS neighborhood school for those living within its boundary. The right to a quality DCPS school with equitable levels of programming applies whether they currently attend or not.

The proliferation of charter schools in these areas–many in former DCPS school buildings–means ensuring adequate capacity in remaining DCPS schools of right will entail more intentional and comprehensive planning and the option of a path to conversion from charter to DCPS. The city government can, if it chooses to, fulfill the guarantee of the right to attend a high quality DCPS school close to home supplemented by a citywide lottery system and application schools.

The lack of adequate capacity to guarantee this right vs the chance to enter a lottery (in mainly, though not limited to, wards 5, 7 and 8) can be corrected by a binding requirement for planning among the 70 separate LEAs and 251 separate public schools across the District.

We need a binding requirement for planning because, currently, both DCPS and charters are able to expand and open new citywide schools without any concern of overlap or enrollment issues. This leads to a high number of unfilled seats in both sectors. This is costly and inefficient as well as ineffective at providing the education and support needed for all students.

In addition, while DCPS schools have the option of converting to a charter school, there is no process in place for DC charter schools to convert to a DCPS school. There have been two charter-to-DCPS conversions in recent years: Dorothy Height and Excel. These conversions were done through high-level agreements instead of through an established process.

It is imperative that school planning and charter conversion ensure adequate capacity for DCPS schools of right and are handled in a fiscally rational way. We suggest the following policy considerations:

1. **There should be a requirement that an impact statement must be considered before the PCSB authorizes a new charter LEA, expands the enrollment (schedule i) of an existing LEA, locates a charter school, or relocates a charter school. That statement should include enrollment data as well as fiscal data. This statement should also be required of DCPS opening or expanding a citywide school.**

Initial Draft of Possible Impact Statement required with School Expansion -

Any impact statement must include the following:

* Rationale for opening or expanding a public school. The DC PCSB currently includes this in the application. ([see page 20](https://dcpcsb.egnyte.com/dl/XQttgOaCSP)).
* Whether there is enrollment capacity in a DCPS school to serve the student enrollments being proposed by the charter LEA in the location(s) being proposed.
* The location of the DCPS neighborhood school or schools likely to be affected by the charter LEA’s or DCPS proposed action with current data on their enrollment capacity, school demographics and community uses.
* A description of the DCPS program, buildings, and grounds of the schools likely to be impacted by the charter LEA proposed action.
* A profile of the students and neighborhoods likely to be impacted by the charter LEA or DCPS proposed action.
* Racial Equity Impact statement to be submitted and reviewed by the Chief Equity Officer
* A transportation analysis which identifies the likely amount of additional trips taken on various modes, the availability of transit, pedestrian, or bicycle options from the locations of likely students' homes, the environmental impact of additional car trips, and a Transportation Demand Management plan in coordination with DDOT which identifies methods of reducing traffic and pollution.

The impact statement should also delve into fiscal matters:

* The expected amount of the charter’s facilities allowance, DCPS expected capital needs.
* Any loss of real property tax revenue from private facilities or land converted to public education use, if part of the proposed expansion or opening.
* Projected administrative and operations costs as a percentage of total per pupil expenditures. (see adequacy study)

Finally, any application along with the impact statement for expanding, opening, locating, or relocating a charter school must be submitted to the DC Council, the DC register and Chancellor of DCPS at the same time it is provided to the PCSB and a formal response submitted to the application by DCPS. There should then be a public input period and ANC input based on the impact statement. For the expansion of DCPS citywide schools, the submission should also be made to the PCSB.

1. **Strengthen programming opportunities and safe spaces in all eight wards to the standard seen at DCPS schools in the northern and western neighborhoods. This will support stronger enrollment in the DCPS neighborhood schools**. The investment has to come first. Citywide charter and DCPS schools were meant to enhance not weaken the DCPS schools of right. Prioritize the DCPS neighborhood schools primarily in wards 5, 7 and 8.

1. **Charter LEAs can initiate a conversion to become a DCPS school through an application to DCPS, which would include any or all of the following processes:**

* A petition with signatures of 65% of the full-time charter school-based staff and 65% of the parents or guardians from the students’ households is provided to the charter LEA, PCSB and Chancellor of DCPS.
* The charter LEA board of directors votes at an open public meeting of staff and families to seek a conversion to become a DCPS neighborhood school, with a 2/3rd board vote in favor of seeking a conversion.
* Following the closing of a charter LEA, the LEA or PCSB requests that DCPS incorporate the charter school into DCPS. If the charter school is in a former DCPS building and owned or leased by the charter LEA, the building will revert back to a DCPS building.

DCPS would then have a series of options upon receiving the application for conversion:

1. Deny the application based on clear factors - enrollment, building condition etc
2. Accept the application, which would
   1. Convert the charter to a DCPS citywide school OR
   2. Convert the charter to a DCPS neighborhood school of right OR
   3. Grant the charter a measure of autonomy within DCPS.

The decision by DCPS will be made using data around current enrollment trends and the capital budget. As a DCPS school, a charter would be covered by union contracts and the DCPS capital budget.

1. **A pause in opening or expanding citywide schools until a binding requirement is in place.** This agreement shall include as noted above, the transparency and public input with third party Impact statements as outlined, investments in program in DCPS under enrolled neighborhood schools primarily in wards 5, 7 and 8 and the policy for a path for charter schools to transition to DCPS schools.

Sincerely,

Members of the [C4DC Coalition](https://www.c4dcpublicschools.org/about)