

ACCOUNTABILITY REVIEW COUNCIL

Report to the School Reform Commission

**Charter School Accountability in the
School District of Philadelphia: Issues of Oversight and Performance**

September 14, 2015

Accountability Review Council

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Executive Summary

In the fall of 2001, the Commonwealth of Pennsylvania asserted its intention to take control of the School District of Philadelphia (SDP) to improve management and academic achievement. To avert the perception of a “hostile” takeover of SDP, the Governor of Pennsylvania and the Mayor of Philadelphia entered into a unique partnership to jointly manage SDP. The reform legislation enacted by the Commonwealth created the five-member School Reform Commission (SRC) and also mandated the establishment of an “independent assessment and reporting center” to evaluate the outcomes of the district’s reform efforts. The statutory obligation to establish an assessment and reporting center was fulfilled by SRC when it created the Accountability Review Council (ARC), an independent entity composed of national experts charged with monitoring the District’s reform efforts.

Over the last decade, the Accountability Review Council (ARC) has served as an independent entity that assesses key reform initiatives and their impact on student achievement in the School District of Philadelphia (SDP). The ARC summarizes its findings and recommendations in an annual report to the School Reform Commission (SRC). All ARC reports are available to the public on the SDP website.

This ARC Report focuses on charter school performance and charter accountability policy.

Given the ongoing public attention focused on charter school accountability and the fiscal implications of charters for the District, ARC examines two issues in this report:

- First, we examine charter school and SDP school performance by drawing on data available in the School Progress Report (SPR) for 2013-14. The SPR 2013-14 gathered school level data from both district schools and charter schools. Even though a few of the charter schools did not submit data to the SDP, the SPR database contains information for 72% of the charter schools in the district (or 62 out of 86 charter schools). The SPR enables us to compare academic performance in several domains for the first time between SDP and charter schools.
- Second, we focus on SDP policy pertaining to charter school accountability: How does SDP monitor charter school accountability? Are SDP monitoring functions adequate and comparable to other urban peer districts? Have the SDP monitoring functions evolved over time?

This ARC report draws on the SPR dataset to conduct a comparison of performance between SDP and charter schools. Using information on student progress, school climate and other domains, SPR categorizes school performance in terms of four performance tiers, namely, intervene, watch, reinforce, and model. Even though only 72% of the charter schools participated in submitting SPR data, ARC sees this report as a useful baseline for further investigation of charter and SDP school performance. The report also examines the continuing expansion of the monitoring functions performed by the district’s Charter School Office. The district’s Authorizing Quality Initiative (AQI) shows that SRC’s commitment toward stronger charter monitoring is making steady progress. ARC is fully supportive of SRC’s efforts to ensure complete transparency for charter schools.

This report also includes an Appendix that provides a brief overview of how charter monitoring and oversight in Philadelphia is comparable to other urban districts in a variety of ways. Specifically, the Appendix references charter oversight policies and practices in New York City, Chicago, Houston, the

Recovery School District (RSD) of New Orleans, and Philadelphia. All of which require charter schools to apply to an authorizing organization. ARC identified district similarities and variations on several monitoring functions, including:

- *Governance transparency*: charter application and agreement, charter board membership and board meetings, and whistleblower protection
- *Financial oversight*: charter disclosure on expenditures and contract services
- *Equal access*: student admissions information (such as lottery or selective practices), and student subgroup enrollment and retention
- *Discipline policy*: transparency of practice and reporting on suspension, expulsion, transfers and parental appeals
- *Quality oversight*: conduct site visits and information on teacher qualification
- *Performance oversight*: student academic performance (including subgroup performance)

ARC recommends further and more in-depth analysis to determine if there are areas in which charter schools tend to outperform comparable SDP schools and to identify charter school practices and policies that may negatively affect student achievement especially among special needs students. For example, SRC may take a closer look at suspension and expulsion practices and their impact on special needs students in schools that experienced higher than average rates in student suspension and expulsion.

To be sure, this ARC report does not resolve the issue of whether charter schools, as a group, are outperforming SDP schools. Clearly, ARC's study is constrained by several factors. First, only 72% of the charter schools participated in SPR data reporting for 2013-14. The non-participating charter schools (28% of the total) may be different from their peers in terms of socio-demographic characteristics, school climate, and student performance. Second, charter schools, as a group, when compared to the district as a whole, show disproportionately lower percentages of English Language Learners, students with disabilities, and low-income students. Measures used in SPR, such as the Average Growth Index (AGI), did take into consideration progress made by the lowest performing students. However, student characteristics are not taken into full consideration in determining the four performance tiers. For example, this ARC report shows that the lowest performing SDP schools in the Intervene category, on average, have 95% low-income students, as compared to 62% in the highest SDP performing category (Model schools). Third, policy and practice on student suspension and expulsion tend to vary among charter schools, which are overrepresented among schools that have the highest out-of-school and in-school suspension rates. These constraining factors hinder ARC from conducting a more complete analysis on performance between charter and SDP schools.

ARC supports SRC's cautious approach on charter school expansion.

In recognition of the severe financial challenges that continue to face the School District of Philadelphia, ARC commends SRC's cautious approach to granting approval for new charter applications and renewing existing charter schools. ARC recognizes the financial impact of charter expansion on the District as a whole. However, although the SRC is precluded by current law to take into account the financial impact of authorizing and reviewing charters, the ARC supports SRC's efforts to work with the state, city, business, and civic leadership to find a long term solution to address equity, fairness, and other structural shortcomings in the current school funding system in Philadelphia.

SRC's cautious approach toward charter school expansion is buttressed by ARC's analysis of school performance. This ARC report found that as a group charter schools are performing better than SDP schools when students' socio-economic characteristics and their learning needs are not fully considered. For example, of the 78 charter schools, 38.4% received the higher performance ratings of Reinforce and Model in 2013-14; of the 213 SDP schools, 19.7% received the higher performance ratings of Reinforce and Model in 2013-14. However, these findings clearly indicate that both sectors have much room for improvement. ARC encourages SRC to continue to closely monitor charter schools since, like SDP schools, a substantial majority fall into the "Intervene" and "Watch" categories of the SPR.

ARC supports SRC's efforts toward ensuring stronger charter school transparency and accountability policies and practices.

SDP is making steady progress in developing and implementing policies to ensure greater accountability for charter schools. ARC recognizes SRC's ongoing effort to strengthen the monitoring and oversight functions in the Charter School Office (CSO). This oversight function is particularly timely in light of the finding in this ARC report that charter schools tend to have a higher representation among schools that have the highest out-of-school and in-school suspension rates. When compared with the charter oversight policies of some of its peer urban districts, as shown in this ARC report, SDP could further develop and enhance its oversight activities in the area of site visits, teacher qualification, and whistleblower protection.

ARC supports CSO's ongoing effort to ensure charter school transparency in its admissions, enrollment and student retention practices, particularly because charter schools tend to enroll a lower percentage of special needs populations. Charter schools, when compared with the district overall, maintain a lower percentage of English Language Learners and students with disabilities (3% as compared to 7% and 11% as compared to 13% respectively). Charter schools, when compared with the district overall, also show a proportionately lower percentage of low-income students (77% as compared to 87% respectively). Therefore, ARC recommends that SRC monitor the admissions and related practices and their effects on equal access in charter schools.

ARC recommends the Pennsylvania Department of Education (PDE) take a stronger role in ensuring charter accountability.

Further, ARC recommends that the PDE provide the SRC and its Charter School Office with clear authority to investigate and report to the PDE on the inadequacies in charter school programs and operations as shown by the data. ARC commends the Charter School Office's effort to monitor improvements in charter school operations and programs. ARC believes that such improvement must be a condition of future renewal or continuation of the charter.

In analyzing the SPR dataset, ARC underscores the importance of requiring full participation of all charter schools in reporting data required by the SPR system. ARC recommends PDE require charter schools to submit SPR data to SRC. For example, contract renewal should be contingent on charter data submission. During 2014-15, 86 charter schools operated in Philadelphia at some point. Sixty-two charter schools (or 72%) participated in the SPR reporting and generated a total of 78 SPR reports for 2013-14. Of the 86 charter schools in operation during 2014-15, 18 (including 4 that were closed during 2014-15) did not agree to participate in the SPR. As an independent assessment center, ARC cannot fulfill its statutory responsibility to monitor school progress for the entire publicly supported school system unless all charter

schools are included in the SPR. In this regard, ARC recognizes CSO's ongoing effort to obtain data from all charter schools. Further, full charter school participation in SPR is necessary for stronger public accountability as annual data on performance and climate in each charter school becomes more transparent. These data will provide parents who exercise school choice more complete information to make an informed choice about the schools in which they enroll their children.

ARC supports PDE and SRC joint efforts to replicate effective “beating the odds” schools and their practices.

In reviewing school performance, ARC urges SRC to take a school-by-school approach (see previous ARC reports that used this approach to identify effective practices). This ARC report found that far too many SDP and charter schools remain in the lower performing categories. According to ARC's analysis of the overall SPR performance tier ratings, about 80% and 62% of the SDP and Charter schools respectively fall within the Intervene and Watch ratings. Fewer than 80% of the students, on average, graduated from SDP and charter schools. ARC recognizes that Action Plan 3.0 has provided a fairly comprehensive set of intervention initiatives in supporting SDP schools toward a higher SPR performance tier. ARC plans to revisit the effectiveness of these initiatives, such as READ! By 4th, in subsequent reports.

Given that 62% of the charter schools fall in the Intervene and Watch ratings, ARC urges the PDE to consider a set of targeted initiatives to improve charter school performance. PDE may collaborate with SDP's Charter School Office to provide technical assistance, data management tools, professional development, and evaluation services to the low performing charter schools. Such support would expand the current monitoring role of CSO and will need additional targeted funding from the PDE. Clearly, students who attend charter schools will benefit from these support programs.

Finally, ARC has identified high performing and “beating the odds” schools in both the District and the charter sector. ARC identifies “beating the odds” schools that are performing well in the SPR domains, even when they serve large percentages of at-risk students. Based on meetings with principals in a sample of charter and district schools, ARC sees the need for the two sectors to engage in an ongoing exchange of effective practices. Clearly, high performing and “beating the odds” schools provide a strong pool of resources and practices to promote a knowledge network in the district. In its previous reports, ARC has underscored the importance of disseminating effective practices among schools. ARC recommends that the Pennsylvania Department of Education (PDE) and SRC provide more personnel and financial resources to support replication of the “beating the odds” models in SDP and charter schools.

Introduction

In the fall of 2001, the Commonwealth of Pennsylvania asserted its intention to take control of the School District of Philadelphia (SDP) to improve management and academic achievement. To avert the perception of a “hostile” takeover of SDP, the Governor of Pennsylvania and the Mayor of Philadelphia entered into a unique partnership to jointly manage SDP. The reform legislation enacted by the Commonwealth created the five-member School Reform Commission (SRC) and also mandated the establishment of an “independent assessment and reporting center” to evaluate the outcomes of the district’s reform efforts. The statutory obligation to establish an assessment and reporting center was fulfilled by SRC when it created the Accountability Review Council (ARC), an independent entity composed of national experts charged with monitoring the District’s reform efforts.

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Since the 2013-14 school year, ARC has shared with the SRC and the Superintendent its continuing concern that the substantial gap in funding SDP schools at an adequate level will not only impede further improvement in education but will also result in a substantial backsliding on any progress in teaching and learning made over the last decade. More importantly, ARC urges state and city leaders as well as the public to work together to bring about longer term solutions to address several structural imbalances: 1) lack of a funding formula that recognizes the heavier burden faced by an urban school district with a large percentage of students living in poverty who require significant special education and other social services; 2) a crushing pension system; and 3) fiscal pressure from the growth in charter schools. Serious fiscal constraints faced by the District substantially limit its ability to provide even an adequate education to the students enrolled in District-run public schools.

ARC has a responsibility to continue to evaluate the extent to which all publicly funded schools in Philadelphia are accountable and transparent in providing education services to improve student outcomes in a safe environment. Charter schools should be required to share the same type of data about student performance, discipline, enrollment and other measures that SDP provides. To the extent that charters have been created and supported as innovative educational entities to encourage competition among publicly funded schools, they should be required to describe in detail and share their innovative practices broadly and demonstrate their effectiveness. Similarly, the District should be encouraged to consider those research-based and effective innovative practices in its Action Plan so as to enhance teaching and learning in District-run schools. To encourage and permit this type of competition and exchange among all publicly funded schools, the “field of play” must be leveled at a minimum through the type of increased and fair funding stream envisioned by the Wolf administration in Harrisburg.

Given the ongoing public attention focused on charter school accountability and the fiscal implications of charters for the District, ARC examines two issues in this report:

- First, we examine charter school and SDP school performance by drawing on data available in the School Progress Report (SPR) for 2013-14. The SPR 2013-14 gathered school level data from both

district schools and charter schools. Even though a few of the charter schools did not submit data to the SDP, the SPR database contains information for 72% of the charter schools in the district (or 62 out of 86 charter schools). The SPR enables us to compare academic performance in several domains for the first time between SDP and charter schools.

- Second, we focus on SDP policy pertaining to charter school accountability: How does SDP monitor charter school accountability? Are SDP monitoring functions adequate and comparable to other urban peer districts? Have the SDP monitoring functions evolved over time?

Charter School Performance: Using the School Progress Report (SPR) for 2013-14

In April 2015, SDP released the School Progress Report (SPR) for 2013-14. The SDP describes the SPR as “an innovative tool designed to help us support, respond to, and improve” Philadelphia’s schools (Philadelphia Public Schools, 2015). In this report, ARC draws on the SPR dataset to examine school performance in charter and District schools.

Recent studies on charter school performance in Philadelphia offer diverse perspectives. Two recent reports provide examples. First, Public Citizens for Children and Youth (2015) reviewed 40 charter schools whose management organizations sought contract renewal. This study used the Pennsylvania School Performance Profile (SPP) to assess charter performance at the school level in a purposeful sample of 40 schools. SPP combines standardized test scores, student growth, attendance, and graduation rates to generate a composite score for each school. The Pennsylvania Department of Education (PDE) considered schools with an SPP above 70 (on a scale of 0-100) to be on track. The SPP has replaced the Adequate Yearly Progress (AYP) in the No Child Left Behind Act as for the purpose of determining schools that are in need of intervention throughout the State of Pennsylvania.

Of this particular sample of 40 charter schools operated by the renewal applicants, the PCCY report found that most charter schools are not performing on track and that they are serving a smaller percentage of various student subgroups. The findings included:

- 40% had an SPP above 70 (or considered on track);
- 60% had an SPP below 70 (or considered not on track);
- 48% had fewer than half of their students on grade level in either reading or math;
- 40% served more economically disadvantaged students than the District’s average enrollment of low-income students;
- 60% served a smaller percentage of students from economically disadvantaged background than the District’s average enrollment for this subgroup;
- 75% served a smaller percentage of English Language Learners in comparison to the District’s average enrollment for this subgroup;
- 53% served a smaller percentage of African American students in comparison to the District’s average enrollment for this subgroup;
- 63% served a smaller percentage of Hispanic students in comparison to the District’s average enrollment for this subgroup.

A second study offers a different, more positive perspective on charter school performance in Philadelphia. *Urban Charter School Study* conducted by Stanford's Center for Research on Education Outcomes (CREDO 2015) examines student-level performance in charter schools in 41 urban regions, including Philadelphia. Each charter student in Philadelphia is matched with a comparison group of 7 students in the TPS (traditional public school), or the Virtual Control Record (VCR) protocol, that is based on demographic characteristics and test scores for multiple years (from 2006-07 to 2011-12). This matched database contains about 80% of all charter schools. Statistical methods are used to "control for" differences in student demographics and eligibility for program supports, such as free and reduced price lunch programs and special education status. Use of the VCR method is designed to make sure that the key remaining relevant difference between charter students and their comparison group is the decision to attend either a charter or TPS in the same urban region.

Unlike the PCCY study, CREDO's study on Philadelphia's charter performance showed generally positive results:

- Philadelphia charters performed 0.5 standard deviations higher than traditional public schools in both math and reading.
- In math, charters had a small positive effect on the subgroups, except for students in special education (SPED) and Asians.
- In reading, charters had a small positive effect on the subgroups, except for SPED.
- In Math, 19% of Philadelphia charter schools were performing worse than traditional public schools, 20% were about the same, and 61% were performing better.
- In Reading, 14% of Philadelphia charter schools were performing worse than traditional public schools, 25% were about the same, and 61% were performing better.

ARC recognizes that these diverse perspectives are due in part to the sampling selection of the two studies. While one targets on the 40 charters schools that were under SRC consideration for renewal in 2015, the other uses a much larger student sample with controls for socio-economic factors and with multiple years of performance data for both charter and district schools. With the availability of SPR, ARC sees a unique opportunity to contribute to this current literature. For the first time, SPR allows ARC to compare charter schools with district schools using the same criteria. SPR provides school data in four separate domains that address achievement, academic growth, school climate and readiness for postsecondary opportunities.

The SPR has several analytic features:

- The SPR looks at schools across multiple domains, taking into consideration the complexity of teaching and learning as well as management and engagement.
- Among the domains, the SPR puts the most emphasis on student growth, indicating the district's overall commitment to supporting all students. For example, the SPR includes the state's Average Growth Index (AGI) that measures growth for the lowest performing 20% of students.
- The SPR identifies each school's "peer group" schools that are serving similar student populations.
- The SPR can serve as a management and planning tool for both SDP and the school to conduct needs assessment, track progress on the anchor goals in Action Plan 3.0, and make decisions grounded in evidence.
- Most importantly for this ARC report, SPR includes performance data in each domain for both District and Charter schools so that a comparison across the two sectors can be made.

The SPR provides each school an overall rating as well as scores in four domains. Schools are also ranked in four distinct performance tiers.

The four domains of performance are:

- *Achievement*
 - The Achievement domain measures performance on standardized assessments, including the Pennsylvania System of School Assessment (PSSA), Keystone Exams, and Assessing Comprehension and Communication in English State-to-State for English Language Learners (ACCESS for ELLs), and reading assessments, including but not limited to Development Reading Assessment (DRA) and Fountas & Pinnell.
- *Progress*
 - The Progress domain measures growth on standardized assessments—including the PSSA, Keystone Exams, and ACCESS for ELLs—and (for high schools only) progress towards graduation. Growth on the PSSA and Keystone Exams is measured using the Pennsylvania Value-Added Assessment System (PVAAS) Average Growth Index (AGI). Progress towards graduation is measured using credit accumulation for students in grades 9-11.
- *Climate*
 - The Climate domain measures student engagement and school climate, focusing on student attendance, student retention, and in- and out-of-school suspensions. The SPR also introduces survey results measuring student and parent/guardian perceptions of school climate as well as parent/guardian engagement; however, survey metrics are not scored and do not contribute to a school’s overall or domain scores in 2013-2014.
- *College & Career (High School Only)*
 - The College & Career domain measures college and career readiness and post-secondary outcomes. In addition to the four-year cohort graduation rate and the first-fall college matriculation rate, The SPR includes three additional metrics: participation in and performance on advanced coursework (e.g., AP, IB), participation in and performance on standardized college entrance exams (e.g., ACT, SAT), and FAFSA completion rates. However, these additional metrics are not scored and do not contribute to a school’s overall or domain scores in 2013-2014.

The overall performance score, which totals 100, for each school is based on the following “weights” assigned to each domain for each of the four school types:

- | | |
|---|---|
| <ul style="list-style-type: none">• Elementary<ul style="list-style-type: none">○ Achievement: 30%○ Progress: 50%○ Climate: 20%• K-8 School<ul style="list-style-type: none">○ Achievement: 30%○ Progress: 50%○ Climate: 20% | <ul style="list-style-type: none">• Middle School<ul style="list-style-type: none">○ Achievement: 30%○ Progress: 50%○ Climate: 20%• High School<ul style="list-style-type: none">○ Achievement: 30%○ Progress: 40%○ Climate: 20%○ College & Career: 10% |
|---|---|

According to SDP, a school's progress at the overall, domain, and metric levels is categorized into four performance tiers based on the percentage of possible points earned (out of a total of 100%):

- Intervene: 0-24% of possible points (or the lowest performance tier)
- Watch: 25-49% of possible points
- Reinforce: 50-74% of possible points
- Model: 75-100% of possible points (or the highest performance tier)

An additional methodological note is the distinction between the number of charter schools and the number of SPR reports that are associated with grade span (or school types as mentioned above) in the charter schools.

During 2014-15, 86 charter schools operated in Philadelphia at some point. Sixty-two charter schools participated in the SPR reporting and generated a total of 78 SPR reports for 2013-14. Some schools had more than one reports due to grade span (for instance, all K-12 schools receive a K8 report and a HS report). In the following analysis, we will refer the SPR reports as schools. In other words, the total number of "charter schools" in the SPR reporting database was 78 for 2013-14.

Of the 86 charter schools in operation during 2014-15, 24 did not participate in the SPR for one reason or another. Legally, charter schools in Philadelphia are recognized by the State as independent entities governed by their own Boards. As such, some charters have exercised this independence as a form of discretion not to participate in the SPR data submission process. However, the SRC as the authorizer of charter schools in Philadelphia, has oversight responsibilities for charters that it carries out through its CSO. Below is the list of the 24 charter schools and their reasons for their not submitting data or having SPR reports:

Two schools agreed to participate but do not serve enough grades to receive a School Progress Report:

- Belmont Academy Charter School (grade K only)
- Youthbuild Charter School (grade 12 only)

Four schools agreed to participate but submitted data past the established deadline and therefore did not receive a School Progress Report:

- Christopher Columbus Charter School
- Global Leadership Academy Charter School
- Khepera Charter School
- Philadelphia Charter School for the Arts and Sciences at Edmunds

The remaining 18 schools decided not to provide data or participate in the School Progress Report process:

- ARISE Academy Charter High School*
- Community Academy of Philadelphia Charter School
- Discovery Charter School
- Esperanza Academy Charter High School

- Franklin Towne Charter Elementary School
- Franklin Towne Charter High School
- Green Woods Charter School
- Imani Education Circle Charter School
- Mariana Bracetti Academy Charter School
- New Foundations Charter School
- Pan American Academy Charter School
- Philadelphia Academy Charter School
- Richard Allen Preparatory Charter School
- Truebright Science Academy Charter School*
- Wakisha Charter School*
- Walter D. Palmer Leadership Learning Partners Charter School*
- West Oak Lane Charter School
- West Philadelphia Achievement Charter School
- (* denotes schools that closed during the 2014-15 school year)

Overall SPR Performance for Charter and District Schools

The overall performance of charter schools and SDP schools are summarized in Table 1:

- Of the 78 charter schools in the SPR dataset, 61.6% received the lower performance ratings of Intervene and Watch in 2013-14.
- Of the 213 SDP schools in the SPR dataset, 80.3% received the lower performance ratings of Intervene and Watch in 2013-14.
- Of the 78 charter schools, 38.4% received the higher performance ratings of Reinforce and Model in 2013-14.
- Of the 213 SDP schools, 19.7% received the higher performance ratings of Reinforce and Model in 2013-14.

Table 1: Overall SPR Tier Ratings for Charter and District Schools, 2013-14

	SDP Schools	% SDP Schools	<i>Charter Schools</i>	<i>% Total Charter Schools</i>	Overall District	% Overall District
Intervene	83	39%	12	15.4%	95	32.6%
Watch	88	41.3%	36	46.2%	124	42.6%
Reinforce	36	16.9%	27	34.6%	63	21.7%
Model	6	2.8%	3	3.8%	9	3.1%
Total	213	100% (N=213)	78	100% (N=78)	291	100% (N=291)

SPR Tier Ratings for SDP and, to some extent, charter schools are associated with the percentage of students who receive free or reduced price lunch (a measure of poverty) (see Table 2). ARC recognizes that student participation in the free and reduced price lunch program (FRPL) is not the most accurate and comprehensive measure of economic disadvantage. At the same time, FRPL is available in the school reports for both charter and SDP schools and provides a useful perspective on the relationship between poverty and school performance.

- Intervene SDP schools, those with the lowest SPR Tier rating, had 95% of the students in poverty.
- Model SDP schools, those with the higher SPR Tier rating, had 62% of the students in poverty.
- Intervene charter schools had 66% of the students in poverty.
- Model charter schools had 61% of the students in poverty.

Table 2: Low Income Characteristics in Charter and District Schools in each SPR Tier Category, 2013-14

	SDP Schools	% FRPL Students in SDP Schools	<i>Charter Schools</i>	<i>% FRPL Students in Charter Schools</i>	Overall District	% FRPL Students in Overall District
Intervene	83	95.1%	12	65.6%	95	91.4%
Watch	88	88.3%	36	60.3%	124	80.3%
Reinforce	36	72.6%	27	56.4%	63	65.8%
Model	6	61.7%	3	60.7%	9	61.3%
Total	213		78		291	

Schools with lower SPR Ratings experienced lower level of student attendance of 95% of instructional days during the academic year (see Table 3):

- Intervene SDP schools showed student attendance at a very low level of 27% of students who attended 95% or more of instructional days
- Model SDP schools experienced a much higher attendance rate of 66%
- Intervene charter schools also showed a low level of student attendance at 43%
- Model charter schools experienced a 68% student attendance rate.

Table 3: Attendance of Ninety-Five Percent or More of Instructional Days in Charter and District Schools in each SPR Tier Category, 2013-14

	SDP Schools	% Student Attendance in SDP Schools	<i>Charter Schools</i>	<i>% Student Attendance in Charter Schools</i>	Overall District	% Student Attendance in Overall District
Intervene	83	25.8%	11	43.1%	94	27.8%
Watch	88	41.4%	35	50.4%	123	44.0%
Reinforce	36	56.6%	27	60.2%	63	58.1%
Model	6	65.5%	3	68.5%	9	66.5%
Total	213		76		289	

High Performing Schools in Each Domain

In previous reports, ARC has taken a school-by-school approach in identifying high performance. In analyzing the SPR data, ARC has identified the top 10 performing schools in each of the 4 domains. A total of 27 schools are identified, including 15 District and 12 charter schools. In Table 4, schools with an X indicate their top performance ranking in a specific domain. Mathematics, Science, Technology Community Charter School is the only school in the entire district that achieves top performing status in all 4 domains. Julia R. Masterman School and Girard Academic Music Program were rated among the top 10 in three domains.

Table 4: Schools with High Performance in Each SPR Domains

School	Achievement	Progress	Climate	College & Career
Julia R. Masterman School	X		X	X
Sadie Alexander School	X		X	
Mathematics, Science, and Technology Community Charter School	X	X	X	X
Laboratory Charter School of Communication and Languages	X			
Central High School	X			X
Girard Academic Music Program	X		X	X
Keystone Academy Charter School	X			
William M. Meredith School	X			
Joseph Greenberg School	X			
Folks Arts Cultural Treasures Charter School	X	X		
Mastery Charter School at Cleveland		X		
Young Scholars Charter School		X		
High School of Engineering and Science		X		X

School	Achievement	Progress	Climate	College & Career
Mastery Charter School at Pastorius		X		
Mastery Charter School at Pickett Campus		X		
Mayfair School		X		
Mastery Charter School at Gratz		X		
Mastery Charter School at Shoemaker Campus		X		
Anne Frank School			X	
Philadelphia Performing Arts: A String Theory Charter School			X	
Elizabeth B. Kirkbride School			X	
Rhawnhurst School			X	
Ad Prima Charter School			X	
Science Leadership Academy				X
Philadelphia High School for Girls				X
William W. Bodine High School				X
Arts Academy at Benjamin Rush				X

“Beating the Odds” Schools in Each Domain

Equally important, ARC identifies schools that are performing well in the SPR domains, even when they serve large percentages of at-risk students. In Table 5, schools with an X in a box indicate that their domain score ranked high while serving high populations of at-risk students. These findings are based on statistical regressions that identify “outliers” when controlling for students’ at-risk characteristics in both the charter and the District schools for each domain. As Table 9 shows, 3 charter schools and 31 District schools are considered as “beating the odds” schools. Six schools showed strong performance in two domains. These schools include Lankenau High School, Young Scholars Charter School, Philadelphia High School for Girls, Philadelphia Military Academy, and William W. Bodine High School.

Table 5: “Beating the Odds” Charter and District Schools

School	Achievement	Progress	Climate	College & Career
Murrell Dobbins Career and Technical High School	X			
Academy for the Middle Years at Northwest	X			
Mastery Charter at Clymer	X			
Spring Garden School	X			
Lankenau High School	X			X
Motivation High School	X			X
Austin Meehan School	X			
High School of the Future	X			
Abraham Lincoln High School	X			
Add B. Anderson School	X			
Young Scholars Charter School		X	X	
Mastery Charter School at Pastorius		X		
Mayfair School		X		
Philadelphia High School for Girls		X		X

School	Achievement	Progress	Climate	College & Career
John B. Kelly School		X		
Philadelphia Military Academy		X		X
Juniata Park Academy		X		
Thurgood Marshall School		X		
Allen Stearne School		X		
John Barry School		X		
Rhawnhurst School			X	
Francis S. Key School			X	
Louis H. Farrell School			X	
Kennedy C. Crossan School			X	
Solomon SolisCohen School			X	
J. Hampton Moore School			X	
William W. Bodine High School			X	X
Franklin S. Edmonds School			X	
Southwark School			X	
Parkway Center City High School				X
Parkway Northwest High School				X
Parkway West High School				X

School	Achievement	Progress	Climate	College & Career
Franklin Learning Center				X
Jules E. Mastbaum Area Vocational Technical High School				X

Student Suspension in Charter and SDP Schools

In reviewing the suspension rates, ARC found that charter schools tend to have higher representation among the schools that have the highest out-of-school suspension rates. Out-of-school suspension is defined as: student is to remain off school property for the duration of the suspension. Of the 74 schools with the highest out-of-school suspension rates in 2013-14 (or the highest 25% of all the schools), there were 26 charter schools (or 33% of all the charter schools) and 48 SDP schools (or 22.3% of all the SDP schools). In contrast, of the 74 schools with the lowest out-of-school suspension rates in 2013-14, there were 15 charter schools (or 19.2% of all the charter schools) and 59 SDP schools (or 27.4% of all the SDP schools).

Further, ARC found that charter schools tend to have higher representation among the schools that have the highest in-school suspension rates. In-school suspension is defined as: student is not allowed in general classroom but must report to the school building for the duration of the suspension. Of the 74 schools with the highest in-school suspension rates in 2013-14 (or the highest 25% of all the schools), there were 40 charter schools (or 51.3% of all the charter schools) and 34 SDP schools (or 16% of all the SDP schools).

Four-Year Graduation and College Matriculation

An analysis of the four-year cohort graduation rates in the 46 SDP and 24 charter high schools in the SPR data files shows that the average graduate rate is comparable, but there is a wider gap among SDP schools:

- The four-year cohort graduation rates for SDP high schools range from 36% to 100%.
- The average four-year cohort graduation rate for SDP high schools is 79.5%.
- The four-year cohort graduation rates for Charter high schools range from 55% to 96%.
- The average four-year cohort graduation rate for Charter high schools is 78.3%.

An analysis of the first-fall college matriculation rates in the 46 SDP and 24 charter high schools in the SPR data files shows that the average matriculation rate for SDP schools is lower and that there is a wider gap among SDP schools:

- The first-fall college matriculation rates for SDP high schools range from 15% to 89%.
- The average first-fall college matriculation rate for SDP high schools is 50%.
- The first-fall college matriculation rates for Charter high schools range from 27% to 86%.
- The average first-fall college matriculation rate for Charter high schools is 61%.

Monitoring and Oversight Functions on Charter Schools in the School District of Philadelphia

Charter Oversight Expansion in Philadelphia

Over 64,000 or 31.1% of Philadelphia public school students attend one of the city's 86 charter schools (School District of Philadelphia, 2015). Established in 1997, the Charter School Office (CSO) in the School District of Philadelphia monitors charter school educational and financial accountability in addition to providing general support. According to a report by The Annenberg Institute for School Reform, "as of spring 2014, a staff of only six in the district's Charter Schools Office is responsible for reviewing every application for a new charter and providing oversight to the city's eighty-six existing charter schools." The CSO must also revise its own authorizing practices every three years. The CSO is under the CSO executive director. Both the CSO and its executive director report to the SRC.

The SRC is Philadelphia's charter authorizer. The Authorizing Quality Initiative, which was adopted by the SRC in 2014, incorporates three principles for charter schools: high standards, autonomy, and protection of student rights and the public interest. The initiative has three phases, namely policy development, performance standards development, and procedures development.

The SRC also renews all of Philadelphia's charter school contracts. In May of 2015, the SRC renewed 12 charters and denied 2. The nonrenewal vote can be appealed, and a charter school may not actually close for several years after that due to the appeals process. Based on the Authorizing Quality Initiative, the SRC imposed conditions on renewals related to services to special needs/English learner students, admissions policies, and the transparency of governing boards. Families are encouraged to "contact the schools directly for open house dates, 12th and 8th grade graduate reports, teacher and student stability data and other school-specific information that they desire" (School District of Philadelphia, 2015).

Since it was first established, in 1997, the Charter School Office in SDP has undergone several reorganizations. Following the creation of the School Reform Commission (SRC) in 2001, the SRC located the Charter School Office ("CSO") within the Office of Accountability, Assessment and Intervention. The primary CSO functions included:

- Responding to Complaints/Concerns from the Public
- Reviewing Requests to Amend Charters
- Conducting Site Visits
- Providing Annual Assessments
- Scheduling Audits
- Preparing Annual Report Compliance Summaries
- Reviewing the Charter Policy

In April 2010, the Office of the Controller of the City of Philadelphia conducted a Fraud Vulnerability Assessment of charter schools. At the time, the CSO had oversight of 63 charter schools. The Assessment indicated the following: "Our review revealed that the School District's Charter School Office (CSO) is only providing minimal oversight of charter schools except during the time leading up to the charter renewal" (Office of the Controller, 2010). The Assessment found that 81% of charter schools' files maintained by CSO were incomplete, and that the CSO was not following through on reporting mandated by the SRC. Further, the Assessment concluded that the use of public funds could not be properly tracked.

“The CSO had no record of nor had any communication with the charter schools board of trustees, even though they are the ones legally entrusted with proper use of public funds” (Office of the Controller, 2010). A former executive director of the CSO said that maintaining files for all 63 charter schools was too big a task for the staff. Until 2012, the CSO had only three staff members including the executive director

The Assessment further stated that the CSO also does not monitor charter facilities or leases, so there is no guarantee that fair rates are being paid. In a review of 13 charter schools, 10 had obtained leases through a related party indicating a potential conflict of interest. For example, the Office of the Controller noted that “one school owned the building but leased it to a for-profit entity who then subleased the building back to the school” (2010). The Office of the Controller also noted that the charter school board and school leadership often did not have proper corporate separateness. In other words, there existed a relationship that suggested the opportunity for conflicts of interest and self-dealing. There were also cases of non-profit charters partnering with for profit education management organization under the same leadership as the charter school. Again indicating the potential for conflicts of interest and self-dealing.

In 2014, the Office of the Controller followed up on its assessment of the CSO’s charter school oversight responsibilities. The Controller found that the required documentation for charter schools was on file. They also noted that oversight still seemed to be focused mainly on the period just preceding the renewal process. At the time of this second assessment, only four staff worked at the CSO, and there was no executive director on the CSO staff. The issue of corporate separateness was still a concern and several charter schools failed to provide minutes of their board meetings as required by Pennsylvania state law.

In 2014, an amendment to state law required the School Reform Commission to annually review and act on charter applications (Public Citizens for Children and Youth, 2015). According to the School District of Philadelphia, on July 1, 2014, the Charter Schools Office and its Executive Director began to report directly to the SRC and the Executive Director held a cabinet position within senior District leadership. In response to the newly enacted amendment the District adopted a policy that stated: “The District shall ensure that the CSO has a staffing level appropriate and sufficient to carry out all authorizing responsibilities. The SRC shall ensure appropriate and sufficient funding of the CSO” (School District of Philadelphia, “Charter Schools Office” Adopted by SRC, April 24, 2014).

A major development in charter accountability policy took place in 2012 with the launching of the Authorizing Quality Initiative (AQI). In November of 2012, the CSO began the three-phase roll out and development of the AQI. The first phase developed policies for charter school oversight based on extensive national research. These proposed policies were made available for public comment through March 2014. The second phase involved the creation of a framework for analyzing a charter school’s academics, organizational compliance, and finances annually and stakeholder meetings took place in 2013 to provide for additional public input on the proposed framework. The third phase involved the development of procedures to use as improved tools for ensuring a high quality authorization process.

The AQI was adopted by the SRC in April 2014. Public Citizens for Children and Youth observed that the AQI “marks significant progress in standardizing the review of charter applications and in creating reasonable and appropriate processes for examining charter applications and performance.” As shown in Table 3, AQI and SRC’s direct supervision of the charter school office has contributed to substantial changes in the district’s charter school monitoring functions between January 2014 and May 2015. Some of the key changes are related to the following oversight functions (see Table 6):

- Governance transparency: charter applications, adjudications and resolutions with conditions are now available on the CSO website
- Financial Oversight: CSO has begun to request financial information of all charter schools
- Equal Access: SRC now requires monitoring of barriers to entry
- Discipline Policy: CSO is in the process of uploading all the school codes of conduct to the CSO website
- Quality Oversight: charter school are now participating in providing and reporting data required for the School Progress Report (SPR)
- Performance Oversight: Charter reporting for SPR 2014-15 is in progress.

Table 6: SDP Monitoring and Oversight Functions on Charter Schools: Changes in District Policy and Practice between January 2014 and May 2015

SDP Monitoring and Oversight Functions	January 2014	January 2015	May 2015	Examples of Key Changes
<i>Governance Transparency:</i> Charter application and charter agreement	Charter application and charter agreements available to public through Right to Know Requests	No Change	Charter applications, adjudications and resolutions with conditions are available on the CSO website	Charter applications received in 2014 along with hearing documents and resolutions have been made available on the CSO website
<i>Governance Transparency:</i> Charter board membership and board meetings	Renewal (five year) review of board membership adherence to bylaws, conflicts of interest policy, and board compliance with the Sunshine Act	4/2014 SRC policy requires annual monitoring of organizational compliance; anticipated annual review of board membership adherence to bylaws, conflicts of interest policy, and board compliance with the Sunshine Act, starting with 2015 Annual Report	CSO issued requests for board bylaws, board policies, board minutes, board agendas and other information pertinent to the Sunshine Act; substantive board information to be included on District CSO website	New SRC policy; first annual report anticipated for December 2015 release; new CSO commitment to a website with transparent information on charter school board composition and action

SDP Monitoring and Oversight Functions	January 2014	January 2015	May 2015	Examples of Key Changes
<i>Governance Transparency:</i> Protect whistleblowers	Confidential conversations with CSO staff and, if applicable, referral to the Office of the Inspector General	No Change	No Change	No change.
<i>Financial Oversight:</i> Disclosure on expenditures and contract services	Charter schools submit Annual Financial Reports which indicate school expenditures across budgetary categories and audited financial statements; and review of contract services for 5-year charter renewal	4/2014 SRC policy requires annual monitoring of financial performance; performance indicators will be based on information in audited financial statements; and review of contract services for 5-year charter renewal	CSO has begun to request financial information of all charters for annual report	New SRC policy; first annual report anticipated for December 2015 release
<i>Equal Access:</i> Student admissions (lottery or selective practice)	Renewal (five year) review of charter application, lottery and enrollment procedures	4/2014 SRC policy requires monitoring of barriers to entry; Anticipated annual review of charter application, lottery and enrollment procedures, starting with 2014 pilot and 2015 Annual Report	4/2014 SRC policy requires monitoring of barriers to entry; Anticipated annual review of charter application, lottery and enrollment procedures, starting with 2014 pilot and 2015 Annual Report	No change.

SDP Monitoring and Oversight Functions	January 2014	January 2015	May 2015	Examples of Key Changes
<i>Equal Access:</i> Monitor enrollment and retention of subgroups (ELL, students with IEP, etc.)	No active process to monitor enrollment and retention of subgroups	4/2014 SRC policy requires monitoring of barriers to entry; District participating in tentative conversations on development of equity reports	4/2014 SRC policy requires monitoring of barriers to entry; equity reports conversations revealed capacity constraints – on hold pending capacity	Update to equity report conversation
<i>Discipline Policy:</i> Transparency of practice	Renewal (five year) review of codes of conduct to determine availability within school community and due process procedural requirements for expulsions and certain suspensions.	4/2014 SRC policy requires annual monitoring of organizational compliance; anticipated annual monitoring of code of conduct availability and procedural requirements	CSO has rolled out the discipline requirement and will upload all school codes of conduct to CSO website	New SRC policy; first annual report anticipated for December 2015 release; CSO website with transparent information on discipline policies
<i>Discipline Policy:</i> Reporting on suspension, expulsion, transfers, and parental appeals	Annual charter reporting of serious incidents to the state	4/2014 SRC policy requires monitoring of barriers to entry; School Progress Report data collection includes submission of suspension data; and the development of equity reports	No change. Equity report development on hold in consideration of additional capacity	New SRC policy; SPR academic assessment; potential for new reports (capacity permitting)

SDP Monitoring and Oversight Functions	January 2014	January 2015	May 2015	Examples of Key Changes
<i>Quality Oversight:</i> Conduct site visits (with regular frequency)	Renewal (five year) site visits to charter schools with focus groups of Board members, administrators, teachers and parents	No Change	CSO has submitted proposal to SRC for a field coordinator to conduct regular site visits; outcome pending based on FY16 budget	No change anticipated without additional funding or staffing
<i>Quality Oversight:</i> Teacher qualification	Renewal (five-year) review of charter adherence to certification and qualification requirements in PA Charter Law & NCLB	Renewal (five-year) review of charter adherence to certification and qualification requirements in PA Charter Law & NCLB	Renewal (five-year) review of charter adherence to certification and qualification requirements in PA Charter Law & NCLB	New SRC policy; pilot year for charter participation in the SPR
<i>Performance Oversight:</i> Student academic performance, including subgroups	Student academic performance assessed by using PSSA/Keystone achievement and growth metrics across the Charter term; subgroup performance data provided	4/2014 SRC policy requires monitoring of academic performance; SPR assessment to be produced for most charters; SPR will include analysis of achievement and growth for the bottom quintile of each school	School Progress Reports developed for 62 charter schools; non-compliance notices sent to non-participating schools	Execution of pilot year SPR; process for 2014-2015 school year already underway

The ongoing development of SDP charter accountability policy continues to shape SRC decisions on charter approval and reauthorization. In recent years, the SRC has taken an increasingly prudent approach to authorizing new charter schools. Superintendent Hite had recommended the SRC not approve new charter schools due to ongoing financial challenges. However, as part of the legislative compromise in adopting a new cigarette tax to address SDP deficit in 2014, the legislature required the SDP to start reviewing new charter school applications. As shown in Table 7, in February 2015, there were 39 charter applications, and the SRC approved six to become new charter schools. These approved applications were submitted by existing nonprofits that already ran successful charter schools in Philadelphia: KIPP, Mastery, Freire, Independence, and MaST. Until its action in February 2015, the SRC had not approved any new non-Renaissance charter schools since 2007 (see below).

Between 2010 and 2013, the SRC created renaissance charter schools. These were existing low-performing SDP schools that were transformed into charter schools. Seven schools were transformed in 2010, six were transformed in 2011, four were transformed in 2012, and three in 2013. Further, while the SRC denied renewal of 10 charters between 2011 and 2015 (see Table 7), the SRC process for closing a charter school is lengthy; it may often take two to three years or longer to complete the process of closure (Mezzacappa, 2008).

Table 7: School Reform Commission Votes on Charter Schools, 2009-10 to 2014-15

School Year	New Charter Applicants Approved	New Charter Applicants Denied	Charter Renewal Approved*	Charter Renewal Denied	Renaissance Charter Created
2009-10	0	N/A	10	0	7
2010-11	0	N/A	5	0	6
2011-12	0	N/A	21	3	4
2012-13	0	N/A	14	2	3
2013-14	0	N/A	8	3	0
2014-15	6	33**	11	2	0

Notes:

These figures do not include conversions and schools that closed without an official non-renewal action.

**Delayed Renewal Actions: Discovery (12-13); Philadelphia Academy (12-13); Ad Prima (13-14); Russell Byers (14-15); Richard Allen (14-15); and Stetson (14-15).*

***The SRC received two resubmitted applications (both among the 33 denied) and will vote on these by September, 2015.*

Conclusions and Recommendations

This ARC Report focuses on charter school performance and charter accountability policy.

Given the ongoing public attention focused on charter school accountability and the fiscal implications of charters for the District, ARC examines two issues in this report:

- First, we examine charter school and SDP school performance by drawing on data available in the School Progress Report (SPR) for 2013-14. The SPR 2013-14 gathered school level data from both district schools and charter schools. Even though a few of the charter schools did not submit data to the SDP, the SPR database contains information for 72% of the charter schools in the district (or 62 out of 86 charter schools). The SPR enables us to compare academic performance in several domains for the first time between SDP and charter schools.
- Second, we focus on SDP policy pertaining to charter school accountability: How does SDP monitor charter school accountability? Are SDP monitoring functions adequate and comparable to other urban peer districts? Have the SDP monitoring functions evolved over time?

This ARC report draws on the SPR dataset to conduct a comparison of performance between SDP and charter schools. Using information on student progress, school climate and other domains, SPR categorizes school performance in terms of four performance tiers, namely, intervene, watch, reinforce, and model. Even though only 72% of the charter schools participated in submitting SPR data, ARC sees this report as a useful baseline for further investigation of charter and SDP school performance. The report also examines the continuing expansion of the monitoring functions performed by the district's Charter School Office. The district's Authorizing Quality Initiative (AQI) shows that SRC's commitment toward stronger charter monitoring is making steady progress. ARC is fully supportive of SRC's efforts to ensure complete transparency for charter schools.

This report also includes an Appendix that provides a brief overview of how charter monitoring and oversight in Philadelphia is comparable to other urban districts in a variety of ways. Specifically, the Appendix references charter oversight policies and practices in New York City, Chicago, Houston, the Recovery School District (RSD) of New Orleans, and Philadelphia. All of which require charter schools to apply to an authorizing organization. ARC identified district similarities and variations on several monitoring functions, including:

- *Governance transparency*: charter application and agreement, charter board membership and board meetings, and whistleblower protection
- *Financial oversight*: charter disclosure on expenditures and contract services
- *Equal access*: student admissions information (such as lottery or selective practices), and student subgroup enrollment and retention
- *Discipline policy*: transparency of practice and reporting on suspension, expulsion, transfers and parental appeals
- *Quality oversight*: conduct site visits and information on teacher qualification
- *Performance oversight*: student academic performance (including subgroup performance)

ARC recommends further and more in-depth analysis to determine if there are areas in which charter schools tend to outperform comparable SDP schools and to identify charter school practices and policies

that may negatively affect student achievement especially among special needs students. For example, SRC may take a closer look at suspension and expulsion practices and their impact on special needs students in schools that experienced higher than average rates in student suspension and expulsion.

To be sure, this ARC report does not resolve the issue of whether charter schools, as a group, are outperforming SDP schools. Clearly, ARC's study is constrained by several factors. First, only 72% of the charter schools participated in SPR data reporting for 2013-14. The non-participating charter schools (28% of the total) may be different from their peers in terms of socio-demographic characteristics, school climate, and student performance. Second, charter schools, as a group, when compared to the district as a whole, show disproportionately lower percentages of English Language Learners, students with disabilities, and low-income students. Measures used in SPR, such as the Average Growth Index (AGI), did take into consideration progress made by the lowest performing students. However, student characteristics are not taken into full consideration in determining the four performance tiers. For example, this ARC report shows that the lowest performing SDP schools in the Intervene category, on average, have 95% low-income students, as compared to 62% in the highest SDP performing category (Model schools). Third, policy and practice on student suspension and expulsion tend to vary among charter schools, which are overrepresented among schools that have the highest out-of-school and in-school suspension rates. These constraining factors hinder ARC from conducting a more complete analysis on performance between charter and SDP schools.

ARC supports SRC's cautious approach on charter school expansion.

In recognition of the severe financial challenges that continue to face the School District of Philadelphia, ARC commends SRC's cautious approach to granting approval for new charter applications and renewing existing charter schools. ARC recognizes the financial impact of charter expansion on the District as a whole. However, although the SRC is precluded by current law to take into account the financial impact of authorizing and reviewing charters, the ARC supports SRC's efforts to work with the state, city, business, and civic leadership to find a long term solution to address equity, fairness, and other structural shortcomings in the current school funding system in Philadelphia.

SRC's cautious approach toward charter school expansion is buttressed by ARC's analysis of school performance. This ARC report found that as a group charter schools are performing better than SDP schools when students' socio-economic characteristics and their learning needs are not fully considered. For example, of the 78 charter schools, 38.4% received the higher performance ratings of Reinforce and Model in 2013-14; of the 213 SDP schools, 19.7% received the higher performance ratings of Reinforce and Model in 2013-14. However, these findings clearly indicate that both sectors have much room for improvement. ARC encourages SRC to continue to closely monitor charter schools since, like SDP schools, a substantial majority fall into the "Intervene" and "Watch" categories of the SPR.

ARC supports SRC's efforts toward ensuring stronger charter school transparency and accountability policies and practices.

SDP is making steady progress in developing and implementing policies to ensure greater accountability for charter schools. ARC recognizes SRC's ongoing effort to strengthen the monitoring and oversight functions in the Charter School Office (CSO). This oversight function is particularly timely in light of the finding in this ARC report that charter schools tend to have a higher representation among schools that

have the highest out-of-school and in-school suspension rates. When compared with the charter oversight policies of some of its peer urban districts, as shown in this ARC report, SDP could further develop and enhance its oversight activities in the area of site visits, teacher qualification, and whistleblower protection.

ARC supports CSO's ongoing effort to ensure charter school transparency in its admissions, enrollment and student retention practices, particularly because charter schools tend to enroll a lower percentage of special needs populations. Charter schools, when compared with the district overall, maintain a lower percentage of English Language Learners and students with disabilities (3% as compared to 7% and 11% as compared to 13% respectively). Charter schools, when compared with the district overall, also show a proportionately lower percentage of low-income students (77% as compared to 87% respectively). Therefore, ARC recommends that SRC monitor the admissions and related practices and their effects on equal access in charter schools.

ARC recommends the Pennsylvania Department of Education (PDE) take a stronger role in ensuring charter accountability.

Further, ARC recommends that the PDE provide the SRC and its Charter School Office with clear authority to investigate and report to the PDE on the inadequacies in charter school programs and operations as shown by the data. ARC commends the Charter School Office's effort to monitor improvements in charter school operations and programs. ARC believes that such improvement must be a condition of future renewal or continuation of the charter.

In analyzing the SPR dataset, ARC underscores the importance of requiring full participation of all charter schools in reporting data required by the SPR system. ARC recommends PDE require charter schools to submit SPR data to SRC. For example, contract renewal should be contingent on charter data submission. During 2014-15, 86 charter schools operated in Philadelphia at some point. Sixty-two charter schools (or 72%) participated in the SPR reporting and generated a total of 78 SPR reports for 2013-14. Of the 86 charter schools in operation during 2014-15, 18 (including 4 that were closed during 2014-15) did not agree to participate in the SPR. As an independent assessment center, ARC cannot fulfill its statutory responsibility to monitor school progress for the entire publicly supported school system unless all charter schools are included in the SPR. In this regard, ARC recognizes CSO's ongoing effort to obtain data from all charter schools. Further, full charter school participation in SPR is necessary for stronger public accountability as annual data on performance and climate in each charter school becomes more transparent. These data will provide parents who exercise school choice more complete information to make an informed choice about the schools in which they enroll their children.

ARC supports PDE and SRC joint efforts to replicate effective "beating the odds" schools and their practices.

In reviewing school performance, ARC urges SRC to take a school-by-school approach (see previous ARC reports that used this approach to identify effective practices). This ARC report found that far too many SDP and charter schools remain in the lower performing categories. According to ARC's analysis of the overall SPR performance tier ratings, about 80% and 62% of the SDP and Charter schools respectively fall within the Intervene and Watch ratings. Fewer than 80% of the students, on average, graduated from SDP and charter schools. ARC recognizes that Action Plan 3.0 has provided a fairly comprehensive set of

intervention initiatives in supporting SDP schools toward a higher SPR performance tier. ARC plans to revisit the effectiveness of these initiatives, such as READ! By 4th, in subsequent reports.

Given that 62% of the charter schools fall in the Intervene and Watch ratings, ARC urges the PDE to consider a set of targeted initiatives to improve charter school performance. PDE may collaborate with SDP's Charter School Office to provide technical assistance, data management tools, professional development, and evaluation services to the low performing charter schools. Such support would expand the current monitoring role of CSO and will need additional targeted funding from the PDE. Clearly, students who attend charter schools will benefit from these support programs.

Finally, ARC has identified high performing and "beating the odds" schools in both the District and the charter sector. ARC identifies "beating the odds" schools that are performing well in the SPR domains, even when they serve large percentages of at-risk students. Based on meetings with principals in a sample of charter and district schools, ARC sees the need for the two sectors to engage in an ongoing exchange of effective practices. Clearly, high performing and "beating the odds" schools provide a strong pool of resources and practices to promote a knowledge network in the district. In its previous reports, ARC has underscored the importance of disseminating effective practices among schools. ARC recommends that the Pennsylvania Department of Education (PDE) and SRC provide more personnel and financial resources to support replication of the "beating the odds" models in SDP and charter schools.

APPENDIX A

Monitoring and Oversight Functions on Charter Schools in Several Urban Districts

Charter Schools as a Growing Sector in Urban Districts

Charter schools are providing school services to a substantial percentage of the students in the School District of Philadelphia and other major urban centers. For illustrative purpose as suggested in Table 1, tens of thousands of students are attending charter schools in Philadelphia and a sample of its urban peers, including New York, Chicago, Houston and New Orleans. More importantly, charter school enrollment accounts for a substantial percentage of the school population in Philadelphia and New Orleans (Recovery School District), namely 31% and 97% of the student population respectively. In contrast, New York and Chicago have a relatively smaller percentage of their students attending charter schools, namely 7% and 13% of the student population respectively.

Further, charter schools, when compared with their city districts, maintain a higher representation of African American students in Philadelphia, New York, Chicago, and Houston (see Table A-1). In Philadelphia and New Orleans, low income students are not as well represented in charter schools when compared with the city district overall. In Philadelphia, charter schools also show a lower percentage of English Language Learners and student with disabilities (3% as compared to 7% and 11% as compared to 13% respectively).

Table A-1: Student Characteristics in Charter Schools: Philadelphia and Selected Urban Districts

Charter Characteristics	New York City	Chicago	Houston	New Orleans (Recovery School District)	Philadelphia
Charter Enrollment	83,200 (projected 6/14)	52,450	49,885 (2013-14)	29,106(2012-13)	64,301
Total District Public Enrollment (including charter)	1,121,201	396,683	211,522 (2013-14)	30,109(2012-13)	206,567
Charter as Percentage of District Total	7.4%	13.2%	23.6% (2013-14)	96.7%(2012-13)	31.1%
Number of Charter Schools	197	131	31 (not including 41 Texas Education Agency charters)	57 (2012-13)	86
Racial/Ethnic Characteristics: Charter/District	59/28 African American 34/40 Latino	55/39 African American 39/46 Latino	32/25 African American 61/63 Latino (2011-12)	94/97 African American (2010)	62/51 African American 17/19 Latino

Charter Characteristics	New York City	Chicago	Houston	New Orleans (Recovery School District)	Philadelphia
Percent Free/Reduced Price Lunch: Charter/District	77/78	91/86	78/74*	82/97*	77/87*
Percent Special Education: Charter/District	13/18	12.4/12.2	6/8*	6/6*	11/13*
Percent EL: Charter/District	6/14	10/13	13/19*	1/1*	3/7*

*Note: *Center for Research on Education Outcomes, Stanford University. (2015). Urban Charter School Study Report on 41 Regions.*

District Policy on Charter Oversight

As student enrollment increases in charter schools, the School District of Philadelphia and its urban peers have assumed a greater role in monitoring charter school accountability. ARC has reviewed the charter school monitoring policy in Philadelphia as well as New York, Chicago, Houston, and New Orleans. Based on this review, ARC identified district similarities and variations on several monitoring functions, including (see Table A-2):

- *Governance transparency*: charter application and agreement, charter board membership and board meetings, and whistleblower protection
- *Financial oversight*: charter disclosure on expenditures and contract services
- *Equal access*: student admissions information (such as lottery or selective practices), and student subgroup enrollment and retention
- *Discipline policy*: transparency of practice and reporting on suspension, expulsion, transfers and parental appeals
- *Quality oversight*: conduct site visits and information on teacher qualification
- *Performance oversight*: student academic performance (including subgroup performance)

Using these six aspects of accountability policy, the School District of Philadelphia has developed a system of charter school oversight that is at least comparable or even stronger than its urban peers. As illustrated in Table A-2, SDP is performing the key monitoring functions as of May 2015, with the exception of implementing a disclosure policy on charter contract services. In contrast, Houston does not provide whistleblower protection, lacks school-level reporting on disciplinary issues, and does not engage in quality oversight on teacher qualification. The following section provides an overview on the development of charter accountability policy in each of the districts and then discusses the SDP role in oversight in greater details.

Table A-2: Monitoring and Oversight Functions on Charter Schools in May 2015: Selected Large Urban Districts

Monitoring and Oversight Functions	New York City	Chicago	Houston	New Orleans (Recovery School District)	Philadelphia
<i>Governance Transparency:</i> Charter application and charter agreement	Yes	Yes	Yes	Yes	Yes
<i>Governance Transparency:</i> Charter board membership and board meetings	Yes	Yes	Yes	Yes	Yes
<i>Governance Transparency:</i> Protect whistleblowers	Yes	Yes	No in Past, Yes possible in future	General, State level	General, State level
<i>Financial Oversight:</i> Disclosure on expenditures and contract services	Expenditures: Yes Contract: N/A	Expenditures: Yes Contract: N/A	Yes	Yes	Expenditures: Yes Contract: N/A
<i>Equal Access:</i> Student admissions (lottery or selective practice)	Yes	Yes	Yes	Yes	Yes
<i>Equal Access:</i> Monitor enrollment and retention of subgroups (ELL, students with IEP, etc.)	Yes	Yes	Yes	Yes (IEP)	Yes
<i>Discipline Policy:</i> Transparency of practice	Yes	Yes	N/A	Yes	Yes
<i>Discipline Policy:</i> Reporting on suspension, expulsion, transfers, and parental appeals	Yes	Yes	District level, not charter school specific	Yes Centralized hearings	Yes
<i>Quality Oversight:</i> Conduct site visits (with regular frequency)	Yes	Right to visit, unclear frequency	N/A	Yes	Right to visit, unclear frequency, visit upon reapplication
<i>Quality Oversight:</i> Teacher qualification	Yes	Yes	No	No	Yes
<i>Performance Oversight:</i> Student academic performance, including subgroups	Yes, unclear if by subgroup	Yes, unclear if by subgroup	Yes	N/A	Yes

New York City

Over 83,000 students attend public charter schools in New York City (NYC), or 8.4% of the total public school enrollment (New York City Charter School Center, 2014). The Office of School Design & Charter Partnerships (OSDCP) oversees 197 charter schools and is housed in the New York City Department of Education. The OSDCP has an 8-person staff (NYCDOE, 2015). In addition to oversight, the OSDCP also authorizes 69 of these schools. Other authorizers in the state include the New York State Department of Education and the State University of New York Charter Schools Institute. Ninety-eight charter schools are run by charter management organizations, 94 are run independently, and 5 are run by education management organizations.

Charter schools, regardless of authorizer, are assigned to one of three cohorts. A senior director in the OSDCP leads the support for each cohort. In addition to the OSDCP, the NYC Charter School Center, a non-profit, supports existing and developing charter schools by providing a resource library, events, and data management. The NYC Charter School Center also provides information to families about individual charter schools. The New York City Comptroller monitors finances.

Each charter school must meet a 5-year performance contract. If a school does not meet all Regents standards and performance goals, it could be closed (New York City Department of Education, 2015). For NYC DOE authorized schools, the OSDCP accountability framework considers academic success, financial soundness, regulatory compliance, and future plans (New York City Department of Education, 2015).

Chicago

Over 50,000 students attend 131 charter schools in Chicago, representing 13.2% of the total public school student population (Chicago Public Schools, 2014). Chicago Public Schools (CPS) and Illinois State Charter School Commission, under the Illinois Board of Education, authorize charter schools, and reevaluate charters every five years. Charters first apply to the local district, and then may appeal to the Commission if denied (Illinois State Charter School Commission, 2015). The Commission currently has two members.

Within CPS, the Office of New Schools (ONS) is in charge of reviewing charter, contract, and applications and renewals of the district's schools that operate under diverse management models. ONS supports existing schools with budgets, operations, and special education services. ONS also develops and evaluates performance contracts through the use of school level data (Chicago Public Schools, 2015). Each year, the charter school board of each school is required to evaluate the school based on the district's School Performance, Remediation and Probation Policy (Chicago Public Schools, 2011). CPS then categorizes each school as Remediation, Probation or Good Standing after review (Chicago Public Schools, 2011)

Facilities have been a recent source of public contention in Chicago. In 2013, CPS closed 50 schools, citing a need to reallocate resources more effectively. At the time, the Chicago Board of Education noted that charter schools would not replace the district schools in those buildings. Recently, hearings have been held in order to determine if charter schools can use former district school buildings. Chicago public schools are currently operating under a 1.1 billion dollar deficit, and some analysts suggest charter use of school

buildings would be more efficient since CPS pays each charter school that is housed in a private building \$750 per student.

Houston

In the 2013-2014 school year, nearly 50,000 students in Houston attended one of the city's 31 charter schools, representing 21% of total public school students in the city. According to the Houston Independent School District (2015), "five chief schools officers oversee HISD elementary, middle, high and alternative/charter schools (respectively). A total of 26 school-support officers and 12 lead principals report to the five chiefs." The district also has a charter school compliance officer, "responsible for creating and maintaining high-quality instructional teams and programs in HISD charter schools and making sure all schools comply with federal and state regulations and requirements"(Houston Independent School District 2015).

New Orleans - Recovery School District

New Orleans has the highest percentage of students attending charter schools among urban districts in the country. Over 90% percent of students in the Recovery School District (RSD) of New Orleans attend charter schools, totaling 46,409 students. New Orleans has had two separate districts since Hurricane Katrina, the Orleans Parish School Board (OPSB), which operates 6 district schools and 12 charter schools, and the Recovery School District, which operates as a portfolio district running 12 district schools and, through contractual arrangements with diverse providers, 58 charter schools in the 2013-2014 school year. As a portfolio district, the RSD also oversees independent schools with performance contracts (Zubrzycki, et al, 2013 & Cowen Institute, 2013). "In the 2012-13 school year, RSD oversaw three- quarters of the schools and enrolled 70 percent of all public school students in New Orleans" (Cowen Institute, 2013).

Both the OPSB and RSD have separate superintendents and report to the Louisiana Board of Elementary and Secondary Education (BESE) and State Superintendent of Education. The BESE authorizes charter schools for the RSD; the OPSB authorizes their own charter schools.

According to the Louisiana BESE, the Charter School Performance Compact (CSPC) of 2013 is the "accountability mechanism for all BESE-authorized charter schools" (2014). It establishes performance criteria and "also ensures that the Louisiana Department of Education is held accountable for implementing a rigorous and fair oversight process that respects the autonomy vital to charter school success" (Louisiana Department of Education, 2014).

This large variety of governing bodies could be confusing to families, so in order to align systems, the RSD created the OneApp to standardize school choice applications. The RSD and OPSB also attempted to create continuity by using the same expellable infractions and created a centralized expulsion hearing office within the RSD. Although the centralization of applications and expulsions are important steps, there are still long-term challenges to governance, including long-term planning and data maintenance (Cowen Institute, 2013).

Comparable Accountability Policy across Urban Districts

Charter monitoring and oversight in Philadelphia is comparable to other urban districts in a variety of ways. New York City, Chicago, Houston, the RSD of New Orleans, and Philadelphia all require charter schools to apply to an authorizing organization. Upon approval, they must follow a charter agreement or a performance contract. All five cities also require each charter school to have a charter board and the board meetings are required to be open to the public.

Financial oversight slightly varies among the five districts. The funding and expenditures related to each charter school in Philadelphia must be reported to CSO. The same requirement applies to New York City and Chicago. Houston and the RSD. In addition, charter schools in Philadelphia are required to obtain competitive bids from licensed and insured vendors and businesses in submitting proposals for contracts in delivering a wide range of services, including janitorial, painting, landscaping, among others.

Other types of quality oversight vary by district. New York City and New Orleans send district oversight teams to visit their charter schools annually. District administrative teams in Chicago and Philadelphia have the right to conduct site visits, but the frequency is unclear. Fraud detection practices also vary among districts. In Pennsylvania, whistleblowers are a primary source of fraud detection for charter schools (Center for Popular Democracy, et al, 2014). Chicago and New York City have specific policies in place to protect whistleblowers in education, but Philadelphia still lacks these protections. Philadelphia, Houston, and the RSD in New Orleans have general state-level whistleblower protections, but are not education specific. One Houston court case, Ohnesorge v. Winfree Academy (328 S.W.3d 654 (Tex. App. – Dallas), November 2010), did not uphold protections under the general state policy. A later case, Pegasus v. Ball-Lowder (No. 05-13-00482-CV (Tex. App. – Dallas), November 18, 2013), established a precedent in Texas that may allow for charter school whistleblower protection in the future. The Center for Popular Democracy recommends that Philadelphia implement “reporting procedures that include conflict disclosure, whistleblower protections, and a clear investigation process” in order to encourage accountability (2014).

Charter school teacher qualifications also vary in each district. Houston and the RSD of New Orleans do not regulate charter school teacher qualifications. Chicago stipulates that 75% must be certified. New York City maintains that a “small” number of charter school teachers may be uncertified if they meet the subject portion of the “high quality” definition in the No Child Left Behind requirements and the teaching assistant is certified.

Although all five districts promote equal student access in charter admissions and to some extent monitor the characteristics of the charter student populations, the socio-economic and other demographic characteristics of charter students tend to differ from the district overall (see Table 1). Philadelphia charter schools, like those in the RSD in New Orleans and New York City, serve proportionately fewer students living in poverty (as measured by free/reduced price lunch status) than traditional district schools. Charter schools in Philadelphia, the RSD in New Orleans, New York City, Houston, and Chicago all serve fewer English Learners and Special Needs students than their traditional district schools counterparts. Philadelphia and Houston monitor the academic outcomes of these subgroups of students, but it is unclear if New York City, Chicago, and the RSD in New Orleans have policies in place to monitor subgroup academics.

Student discipline policies also slightly vary by district. New York City, Chicago, the RSD in New Orleans, and Philadelphia all require transparency in discipline policies. These four cities also require reporting on expulsions and suspensions. Charter schools in the RSD conduct all expulsion hearings in the central office.

Overall, SDP charter monitoring functions follow the trends of other large urban districts. Governance transparency, access, discipline, and academic oversight are comparable. At the same time, SDP has fewer specific plans for site visits and whistleblower protections than some districts.

References

Table 7: School Reform Commission Votes on Charter Schools, 2009-10 to 2014-15

- <http://thenotebook.org/blog/102637/all-11-charters-recommended-renewal>
<http://thenotebook.org/blog/135986/district-puts-action-most-charter-renewals>
<http://thenotebook.org/april-2011/113517/four-charters-get-renewals-many-wait-expansion-requests>
<http://thenotebook.org/blog/147424/cigarette-tax-philly-schools-clears-major-hurdle-pa-house>
School District of Philadelphia. (2015). Pending Non-renewal/Revocation.
http://webgui.phila.k12.pa.us/offices/c/charter_schools/pending-nonrenewals/revocations
School District of Philadelphia. (2015). Renaissance Schools.
<http://webgui.phila.k12.pa.us/offices/r/renaissance-schools>
Mezzacappa, D. (2008). SRC is asking more from charter operators.
<http://thenotebook.org/summer-2008/08237/src-asking-more-charter-operators#>
Woodall M. & Graham K. (2015). SRC approved 5 new charter schools.
http://articles.philly.com/2015-02-20/news/59309431_1_five-new-charter-schools-mastery-charter-operator

Table A-1: Student Characteristics in Charter Schools: Philadelphia and Selected Urban Districts

- *Center for Research on Education Outcomes, Stanford University. (2015). Urban Charter School Study Report on 41 Regions.
<https://urbancharters.stanford.edu/download/Urban%20Charter%20School%20Study%20Report%20on%2041%20Regions.pdf>
New York City Department of Education. (2015). NYC Data: Demographic Snapshots.
<http://schools.nyc.gov/Accountability/data/default.html>.
<http://schools.nyc.gov/AboutUs/schools/data/stats/default.html>.
New York City Charter School Center. (2014). Charter School Facts, 2014-2015.
<http://www.nyccharterschools.org/facts>
Chicago Public Schools. (2015). School Data: Racial/Ethnic Report 2014-2015.
<http://cps.edu/SchoolData/Pages/SchoolData.aspx>
Chicago Public Schools. (2015). School Data: Limited English Proficiency, Special Ed, Low Income, IEP Report 2014-2015. <http://cps.edu/SchoolData/Pages/SchoolData.aspx>
Educate Now! (2015). New Orleans by the Numbers: Public School Enrollment.
<http://educatenow.net/2015/01/28/new-orleans-by-the-numbers-public-school-enrollment/>
Philadelphia Public School District. District & Charter Schools.
<http://www.philasd.org/about/#schools>
National Alliance for Public Charter Schools. (2014) http://www.publiccharters.org/wp-content/uploads/2014/12/2014_Enrollment_Share_FINAL.pdf
The Cowen Institute for Public Education Initiatives at Tulane University. (2013). NOLA by the Numbers: School Enrollment and Demographics, Oct. 2013.
Houston Independent School District. (2015). Advanced search: charter.
http://www.houstonisd.org/_selectASchool

Table A-2: Monitoring and Oversight Functions on Charter Schools in May 2015: Selected Large Urban Districts

Chicago Public Schools. (2010). Office of New Schools 2010-2011 Charter/Contract School Compliance Chart.

Chicago Public Schools. (2011). Chicago Public Schools Policy Manual: Code of Ethics.

Illinois State Board of Education (2015). Legal Division: Charter Schools. Legislation, Rules, and Policy. <http://www.isbe.net/charter/>

Louisiana Association of Public Charter Schools (2015). Resources.

Louisiana Department of Education (2014). Raising the Bar: Louisiana Type 2, 4, and 5 Charter Schools 2014-2015 Annual Report.

Louisiana Department of Education (2015). Charter School Performance Compact: Model Master Discipline Plan

Louisiana Department of Education (2015). Louisiana Charter School Performance Compact (Types 2, 4, and 5 Charter Schools)

Louisiana Department of Education Charter School Performance Compact: Public Bid Law

New York City Charter School Center (2014). Charter School Facts, 2014-2015. <http://www.nyccharterschools.org/facts>

New York City Department of Education. (2013). Accountability Handbook for DOE-Authorized Charter Schools- School year 2013-2014.

New York City Department of Education. (2013). Charter Schools Accountability & Support. Student Discipline: What Your Charter School Needs to Know About Suspensions, Expulsions, and Due Process

New York City Department of Education. (2015). Charter Schools. <http://schools.nyc.gov/community/planning/charters/default.htm>

Office of the Controller, City of Philadelphia Pennsylvania. (2014). Charter School Oversight School District of Philadelphia

Ohnesorge v. Winfree Academy, 328 S.W.3d 654 (Tex. App. – Dallas), November 2010.

Pegasus v. Ball-Lowder, No. 05-13-00482-CV (Tex. App. – Dallas), November 18, 2013

Public Citizens for Children and Youth. (2015). The Legal, Fiscal and Oversight Challenges of Granting New Charters in Philadelphia.

Texas Association of School Boards. (2009). Charter Schools in Texas: Facts and Figures. <https://www.tasb.org/Legislative/Issue-Based-Resources/documents/charters.aspx>

Texas Charter Schools Association.

Texas Education Agency. (2015). Charter School Reports. http://tea.texas.gov/Texas_Schools/Charter_Schools/Charter_Schools_-_Reports/

Texas Government Code: Title 5: Open Government, Subtitle A: Open Government, Chapter 551 Open Meetings.

The School District of Philadelphia (2014). Proposed Charter Schools Policy.

The School District of Philadelphia. (2014). Charter Schools Office. Philadelphia Charter Schools and the Authorizing Quality Initiative.

The School District of Philadelphia (2015). Charter Schools Office. Charter School FAQs.

The School District of Philadelphia. (nd). Authorizing Quality Initiative – Charter School Background and Context

New York City Charter School Accountability

New York City Department of Education. (2015). DOE Charter Schools Team Contacts
http://schools.nyc.gov/NR/rdonlyres/9C546214-BDC7-4238-AFE1-07EFCACA1AED/0/CSASContactInformation_082014.pdf
New York City Charter School Center (2015). Approval, Accountability, and Oversight of NYC Charter Schools. <http://www.nyccharterschools.org/sites/default/files/resources/OversightOct14.pdf>
New York City Charter School Center. (2014). Charter School Facts, 2014-2015.
<http://www.nyccharterschools.org/facts>
New York City Department of Education. (2015). NYC DOE OSDCP Accountability & Oversight.
http://schools.nyc.gov/community/planning/charters/Accountability_Oversight.htm
New York City Department of Education. (2015). Accountability Handbook for NYC DOE Chancellor-Authorized Charter Schools. http://schools.nyc.gov/NR/rdonlyres/CF2A3660-1A41-4A0A-A694-9628E36DF71D/0/NYCDOEAccountabilityHandbook201415_FINAL.pdf

Chicago Charter School Accountability

Chicago Public Schools. (2011). Charter Accountability Plan- 2010-2011 SCHOOL YEAR
Chicago Public Schools. (2015). Office of New Schools.
<http://cps.edu/NewSchools/Pages/WhoWeAre.aspx>
Fitzpatrick, L. (2015). Reversing its promise, CPS may allow charters to move into closed school buildings
Illinois State Charter School Commission. (2015). Frequently Asked Questions
<http://www.isbe.net/scsc/pdf/faq.pdf>

Houston Charter School Accountability

Houston Independent School District. (2015). Charter School Compliance Officer.
<http://www2.houstonisd.org/HISDConnectDS/v/index.jsp?vgnextoid=774fa7e0e8718210VgnVCM10000028147fa6RCRD&vgnnextchannel=c7782f796138c010VgnVCM10000052147fa6RCRD>
Houston Independent School District. (2015). Advanced search: charter.
http://www.houstonisd.org/_selectAschool
Houston Independent School District. (2015). Facts and Figures.
Houston Independent School District. (2015). HISD Organization.
<http://www.houstonisd.org/Page/31690>

New Orleans Charter School Accountability

The Cowen Institute for Public Education Initiatives at Tulane University. (2013). NOLA by the Numbers: School Enrollment and Demographics, Oct. 2013.
Louisiana Department of Education (2014). Expanding Quality Options: Louisiana Type 2, 4, and 5 Charter Schools 2013-2014 Annual Report.
Zubrzycki, J., Cavanagh, S., & McNeil, M. Charter Schools' Discipline Policies Face Scrutiny. Education Week. http://www.edweek.org/ew/articles/2013/02/20/21charters_ep.h32.html

Philadelphia Charter School Accountability

The School District of Philadelphia. (2015). District Schools.

<http://www.phila.k12.pa.us/about/#schools>

The School District of Philadelphia. (2015). Charter Schools.

<http://www.phila.k12.pa.us/about/#charter-schools>

The School District of Philadelphia (2014). Charter Schools Office. Adopted by SRC, April 24, 2014.

The School District of Philadelphia (2014). Proposed Charter Schools Policy.

Mezzacappa, D. (2015). SRC renews 12 charters and denies 2 in May vote.

<http://thenotebook.org/summer-2015/158588/src-renews-12-charters-and-denies-2-may-vote>

The School District of Philadelphia. (2015). Authorizing Quality Initiative – Charter School Background and Context.

Hardy, D (2015). How are Charter Schools Funded in Pennsylvania? The Public School Notebook.

Center for Popular Democracy, Integrity in Education, & Action United. (2014). Fraud and Financial Mismanagement in Pennsylvania’s Charter Schools.

Office of the Controller. (2010). Fraud and Special Investigations: Review of Charter School Oversight, a Fraud Vulnerability Assessment.

Public Citizens for Children and Youth, (2015). The Legal, Fiscal, and Oversight Challenges of Granting Charters in Philadelphia.