

DISTRICT OF COLUMBIA PUBLIC CHARTER SCHOOL BOARD

Staff Proposal	School Request
<input type="checkbox"/> Charter Application Approval (Full)	<input type="checkbox"/> Enrollment Ceiling Increase
<input type="checkbox"/> Charter Application Approval (Conditional)	<input type="checkbox"/> Change in LEA Status
<input type="checkbox"/> Charter Application Denial	<input type="checkbox"/> Lift Board Action
<input type="checkbox"/> Charter Continuance	<input type="checkbox"/> Approve Accountability Plan
<input type="checkbox"/> Proposed Revocation	<input type="checkbox"/> Operate in a New Location
<input type="checkbox"/> Revocation	<input type="checkbox"/> Charter Amendment
<input type="checkbox"/> Lift Board Action	<input type="checkbox"/> Approve E-Rate Plan
<input type="checkbox"/> Board Action, Charter Warning	
<input type="checkbox"/> Board Action, Notice of Concern	
<input type="checkbox"/> Board Action, Notice of Deficiency	
<input type="checkbox"/> Board Action, Notice of Probation	
<input type="checkbox"/> Proposed Revisions to PCSB Existing Policy	
<input type="checkbox"/> New PCSB Policy/Decision Memo—Open for Public Comment	
<input checked="" type="checkbox"/> New PCSB Policy/Decision Memo—Vote	
<input type="checkbox"/> Other	

PREPARED BY: **Rashida Tyler, Manager of School Quality and Accountability**
 Mikayla Lytton, Manager of Systems and Strategy

SUBJECT: **Designation for Eligibility for Alternative Accountability Framework**

DATE: **February 19, 2014**

Proposal

The District of Columbia Public Charter School Board (“PCSB”) staff recommends that the Board vote to approve the Designation for Eligibility for Alternative Accountability Framework (“AAF”) policy.

The PCSB Board voted to open this policy for public comment at the December 16, 2013 board meeting. During the 30-day public comment period, which included an opportunity for comments to be given at the January 22, 2014 board meeting, PCSB received comments from Maya Angelou PCS (“MAPCS”), which is appended to the policy along with PCSB responses.

In response to the public comment, PCSB staff amended the policy in the following ways:

- Expanded the list of risk factors for eligibility
- Lowered the threshold for eligibility to 60%
- Defined the length of time that a school’s AAF’s eligibility lasts

Background

Although some public charter schools strive to provide alternative programs in order to serve highly at-risk students, currently no public charter school is designated as alternative for accountability purposes by either PCSB or OSSE. Several schools, including LAYC Career Academy PCS, Maya Angelou PCS – Evans High School, Next Step/El Próximo Paso PCS, YouthBuild PCS, and the high school population of Booker T. Washington PCS, have received alternative designation by OSSE for funding purposes.¹

Without an official way of classifying a school's population as "alternative" for accountability purposes, all K-12 programs use the Elementary/Middle School and/or the High School Performance Management Framework ("PMF") as the primary instrument for measuring their academic performance and, starting in the 2013-14 school year, all Adult Education and Early Childhood programs use the Adult Education PMF and the Early Childhood PMF, respectively, as the primary instrument for measuring their academic performance². PCSB recognizes that these standard accountability frameworks can be inappropriate for measuring a school serving a population that is considerably different and more challenged than that of most schools.

On April 17, 2012, as an interim step towards addressing this issue, PCSB made a public statement that two public charter schools, Maya Angelou PCS and Options PCS, serve "substantially different" populations than other public schools serving the same grades. PCSB also announced that it was "working to explore whether an alternative PMF would more appropriately measure the schools' academic performance and overall quality." (See Appendix B for the full statement.) These schools received a PMF score, but did not receive a PMF tier on the 2012 and 2013 PMF.

On March 2013, PCSB presented data to the Board after investigating the populations at all public charter schools and comparing them among each other. This data revealed that, regardless of formula and weights, Options PCS and Maya Angelou PCS – Evans High School are consistently identified as serving significantly higher percentages of students with at risk indicators than other public charter schools. In addition, St. Coletta Special Education PCS was identified as serving significantly higher populations of students receiving extensive special education services than other public charter schools.

PCSB staff reviewed research and published materials (Appendix A), and studied Alternative Accountability Frameworks in other states. Most other states with alternative accountability procedures have an expectation that virtually all of the students at a school receiving alternative accountability will exhibit risk factors. In addition, two PCSB staff members participated in the NACSA Working Group on Accountability for Alternative Charter Schools. This working group contributed to the writing of the document, "Anecdotes Aren't Enough: An Evidence-Based Approach to Accountability for Alternative Charter Schools." This paper establishes an alternative

¹ Schools that qualify for alternative education weighting in the Uniform Per Student Funding Formula (UPSFF) meet the following criteria and rules set by OSSE: a school or a program within a school must show evidence that at least 60 percent of its students possess any one of the criteria: under court supervision, on short-term and long-term suspension, chronically truant, expelled, referred from Youth Service Administration as juvenile delinquent or any combinations of the listed criteria. OSSE is currently revising this criteria, but PCSB is concerned about its ability to accurately track and verify this data and does not agree that chronically truant is an appropriate risk factor for the purposes of qualifying a school for alternate accountability.

² Separate from the PMF instruments which are used to annually assess a school's academic quality schools are evaluated for renewal and revocation purposes according to whether or not they have met their goals and academic achievement expectations.

accountability procedure based on schools' student populations and mission but allows for flexibility and adaptability in how these schools are held accountable to academic performance expectations. PCSB has designed the proposed policy to follow the best practices described in this paper, found at: <http://bit.ly/1fWEWCX>.

Proposed PCSB Policy for Eligibility For the Alternative Accountability Framework

In order for a school to be eligible for the Alternative Accountability Framework (“AAF”), it will meet all of the following criteria:

- (1) The percentage of the school’s students who are identified as having at least one of the following risk factors is at least 60%:
 - a. receiving special education services at levels 3 or 4;
 - b. is at least two years over-aged and under-credited for their grade level;
 - c. is pregnant or mothering;
 - d. is currently under court supervision³;
 - e. has been expelled for federally recognized reasons⁴;
 - f. is currently or formerly incarcerated⁵ or adjudicated;
 - g. is homeless; or
 - h. is currently or formerly in foster care.
- (2) The school’s mission specifically expresses their desire to serve at-risk and/or high-level special education students.⁶
- (3) The school serves grades that fall within the traditional PK-12 system, with the ultimate aim of students earning a DC high school diploma.

Schools that meet the above criteria shall be approved by PCSB to use AAF. Once approved, they will consult with PCSB staff to design a unique set of goals aligned to specific indicators⁷ of quality, with traditional and/or non-traditional measures⁸, metrics⁹ and targets unique to their school’s program. This school’s unique AAF will be subject to PCSB board approval and will ultimately be incorporated into the school’s charter as their charter goals and student achievement expectations. Each school’s AAF will be annually measured and the achievement results will be shared publicly.

The specific targets for each school may be determined using baseline data from previous years or results from other schools serving similar populations of students in Washington, DC or other districts in the country.

- **Student Progress** – Academic improvement over time on the statewide assessment
- **Student Achievement** – Academic proficiency on the statewide assessment and additional assessments such as NWEA MAP, Scantron Performance Series, Renaissance Learning, etc.
- **Gateway/Post-Secondary Readiness** – Outcomes in key subjects that indicate future success or that are aligned to college and career readiness such as graduation rates of 4, 5, 6 or 7 year cohorts, SAT/ACT performance, Accuplacer results, preparation of FAFSA applications, workforce readiness, credit/course completion, or other post-secondary readiness metrics

³ Includes students affiliated with the following agencies: Child and Family Services (CFSA), Department of Youth Rehabilitation Services (DYRS), Persons in Need of Supervision (PINS), on probation or on parole. This risk factor will be included pending receipt of data from OSSE and these agencies.

⁴ This includes students having brought to or possessing a firearm to school

⁵ This includes incarceration in an adult correctional facility or a juvenile detention center.

⁶ Schools whose original mission does not include serving alternative students, but whose student populations have evolved to include larger percentages of at-risk and high-need special education students may amend their missions.

⁷ Indicators – General dimensions of quality or achievement

⁸ Measures – General instruments or means to assess performance in each area defined by an indicator

⁹ Metrics – The calculation method or formula for a given measure

- **Student Engagement** – Predictors of student achievement such as suspension rates, truancy rates, in-seat attendance rates, student re-engagement rates, and positive socio-emotional or psychological adjustment rates

Schools will keep the alternative designation until the time of their next charter review or renewal. PCSB will collect student data from schools on these risk factors within the annual report and audit their data annually.

APPENDIX A

Documents Reviewed

In addition to specific citations listed above, PCSB staff reviewed the following documents:

Education Evolving, Alternative Education Programs, “The Quiet Giant in Minnesota Public Education. June 2003

Ernst, J.L. and Turnbull, J., Alternative Growth Goals for Students Attending Alternative Education Campuses. Colorado League of Charter Schools

Ernst, Jody L., Comparison of Annual Growth Percentiles Among Alternative Education and Traditional Middle School Students in Arizona. Colorado League of Charter Schools

Ernst, Jody L.. Are Alternative Growth Goals Warranted for Colorado’s Alternative Education Schools and Students? Colorado League of Charter Schools

Evers, Tony, Alternative Education Programs. Wisconsin Department of Public Instruction, November, 2009

NACSA, Anecdotes Aren’t Enough: An Evidence-Based Approach to Accountability for Alternative Charter Schools, 2013

National Center on Educational Outcomes, Accountability for Students with Disabilities, May 2012

Carver, P., Tice, P. Alternative Schools and Programs for Public School Students At Risk of Educational Failure: 2007-08. National Center for Education Statistics, March 2010

Swarts, Leon, Alternative Education Accountability: Kentucky’s Approach. Impact Newsletter , College of Education and Human Development, U. of Minnesota

Texas Education Agency, Alternative Education Accountability, 2011

APPENDIX B

Statement by the D.C. Public Charter School Board on Status of Maya Angelou Public Charter School and Options Public Charter School

April 17, 2012

The student bodies of Maya Angelou Public Charter School (MAPCS) and Options Public Charter School (OPCS) are substantially different than those of standard public schools serving the same grades and in the same neighborhoods. Both MAPCS and OPCS intentionally target special education students, students who have a history of chronic truancy, suspension/expulsion, incarceration, homelessness, or foster care, and/or students who have dropped out of school.

Both schools received Tier III rankings in the most recent Performance Management Framework (PMF) results. PCSB is concerned that the PMF as currently structured may not be the best tool for measuring the success of these schools. Consequently, PCSB is working to explore whether an alternative PMF would more appropriately measure the schools' academic performance and overall quality. PCSB is also working collaboratively with the Office of the State Superintendent of Education (OSSE) to determine whether these schools should be identified as "alternative" using either the current or a to-be-developed definition.

During the time that the PCSB addresses these issues, both MAPCS and OPCS will not be considered as candidates for charter revocation under the PCSB's PMF policies.

The PCSB intends to complete its work on these issues prior to or during the 2012-13 school year. Any new PMF evaluation of MAPCS and OPCS with consequences (including the risk of closure) would take place beginning in the 2013-14 school year at the earliest.

Nothing in this statement should be construed to limit the PCSB's authority under Section 38-1802.13 of the DC Code.

APPENDIX C

Schools with Higher Percentages of Students with “At-Risk” Indicators

These indicators were identified by the PCSB Board as material to the identification of schools eligible for assessment under the alternative PMF.

Special Education Levels 3 & 4	Over Age by two or more years for the grade level	Incarcerated ¹⁰	Homeless ¹⁴	Pregnant and/or Mothers ¹⁴	Identified by CFSA as in the foster care or court system	All Identified Risk Factors Combined ¹¹	Additional Factor: New Students with Past Exclusionary Incidents ¹²
<p>>=50%: St. Coletta PCS (100%) Options PCS (61%)</p> <p>>=15%: Maya PCS – Evans HS (20%) Maya PCS – Evans MS (17%)</p>	<p>>=20%: Next Step PCS – Day (33%) Options PCS (26%) Maya PCS – Evans HS (24%)</p>	<p>>= 20%: Options PCS (57%) YouthBuild PCS (25%) Maya PCS – Evans HS (21%)</p>	<p>>= 10%: Options PCS (20%) Septima Clark PCS (12%) CAPCS – Amos III (10%)</p>	<p>>= 10%: ESF PCS (100%) YouthBuild PCS (26%) Next Step PCS (22%) Options PCS (15%)</p>	<p>>= 5%: LAYC Career Academy PCS (8%) St. Coletta PCS (6%)</p>	<p>>= 60%: Options PCS (173%) St. Coletta PCS (104%) Maya PCS – Evans HS (73%)</p>	<p>>=50%: Howard Road – MLK (100%)¹³ Maya PCS – Evans HS (60%) Options PCS (54%) Maya PCS – Young Adult (50%) AppleTree PCS – Parkland (50%)</p>
<p>>=10%: EL Haynes PCS – Georgia Ave (14%) IDEA PCS (11%) Bridges PCS (10%)</p>	<p>>=15%: Next Step PCS – Adult (17%) Chavez PCS – Capitol Hill (16%)</p>	<p><i>Note: No other schools reported significant numbers</i></p>	<p>>= 5%: 13 schools</p>	<p>>= 5%: Maya PCS – Evans HS (5%)</p>	<p>>= 2%: Maya PCS – Young Adult Learning Center (4%) Maya PCS – Evans HS (3%) Next Step PCS – Day (3%) AppleTree PCS – Amidon (2%)</p>	<p>>= 20%: Maya PCS – Evans MS (28%) Hospitality PCS (26%) Richard Wright PCS (25%) IDEA PCS (22%) Chavez PCS – Capitol Hill (20%)</p>	<p>>=40%: Chavez PCS – Parkside HS (48%) National Collegiate Prep (44%) Maya PCS – Evans MS (42%) Booker T PCS (41%)</p>

¹⁰ These indicators were reported to PCSB in population bands. For schools reporting 1-9 students in a specific category, PCSB staff assumed the actual number was nine.

¹¹ Because this analysis was not done at the student level a student with multiple risk factors will be counted for each of those factors. Therefore these percentages will overstate the number of students exhibiting at least one risk factor.

¹² Of new students entering the LEA from another public charter LEA, percent with history of exclusionary incidents in their previous school.

¹³ Because there was only one student included in the tracked cohort for this analysis, PCSB does not consider this a valid metric.

Middle Schools with High Percentages of Students with “At-Risk” Indicators

These indicators were identified by the PCSB Board as material to the identification of schools eligible for assessment under the alternative PMF.

Special Education Levels 3 & 4	Over Age by two or more years for the grade level	Incarcerated ¹⁴	Homeless ¹⁷	Pregnant and/or Mothers ¹⁷	Identified by CFSA as in the foster care or court system	All Identified Risk Factors Combined ¹⁵	Additional Factor: New Students with Past Exclusionary Incidents ¹⁶
<p>>= 15%: Maya PCS – Evans MS (17%)</p>	<p>>= 5%: Perry Street PCS (9%) Maya PCS – Evans MS (8%) KIPP DC - AIM (6%)</p>	<p>>= 1%: Maya PCS – Evans MS (4%) Paul PCS (2%)</p>	<p>>= 5%: Howard Road Academy – MLK (7%)</p>	<p>>= 4%: Howard Road Academy – MLK (7%) Maya PCS – Evans MS (4%)</p>	<p>>= 1%: EL Haynes PCS – Georgia Ave (1%)</p>	<p>>= 30%: Maya PCS – Evans MS (38%)</p>	<p>>=30%: Howard Road – MLK (100%)¹⁷ Maya PCS – Evans MS (41%) Chavez PCS – Parkside MS (33%)</p>
<p>>= 5%: KIPP DC – AIM (9%)</p>			<p>>= 4%: KIPP DC PCS: KEY (5%) Achievement Prep PCS (5%) Maya PCS – Evans MS (4%)</p>				

¹⁴ These indicators were reported to PCSB in population bands. For schools reporting 1-9 students in a specific category, PCSB staff assumed the actual number was nine.

¹⁵ Because this analysis was not done at the student level a student with multiple risk factors will be counted for each of those factors. Therefore these percentages will overstate the number of students exhibiting at least one risk factor.

¹⁶ Of new students entering the LEA from another public charter LEA, percent with history of exclusionary incidents in their previous school.

¹⁷ Because there was only one student included in the tracked cohort for this analysis, PCSB does not consider this a valid metric.

Appendix E
Written comment from MAPCS



January 22, 2013

DC Public Charter School Board
Attention: Skip McKoy, Board Chair
3333 14th Street, NW Suite 210
Washington, DC 200010

Dear DC Public Charter School Board:

We appreciate the opportunity to provide our public comment on the Designation for Eligibility for Alternative Accountability System (AAS). The Maya Angelou Public Charter High School welcomes an accountability framework that acknowledges that our students are different and that recognizes the need for different indicators and metrics to ascertain if we are successfully serving them. Within this letter, we offer several comments that we believe would improve this proposal. We would like the Board to consider the following amendments to the proposed policy: 1) expand the list of student risk factors, 2) permit the AAS to govern each school's expectations without an additional PMF, and 3) preserve the stability of charter goals in each school's charter contract.

Expand the List of Student Risk Factors

According to the proposed PCSB policy, a school may be designated as eligible for the AAS if the percentage of the school's students are identified as having at least one of the following risk factors: receiving special education services at levels 3 or 4; at least two years over-aged and under-credited for their grade level; pregnant or mothering; currently or formerly incarcerated; homeless, or currently in foster care. While we believe that all of these risk factors should be included with the designation, we also feel that there are other risk factors that are part of a true "alternative" population. The National Association of Charter School Authorizers (2013) report, *Anecdotes Aren't Enough: An Evidence-Based Approach to Accountability for Alternative Charters*, offers several other categories that might qualify as alternative including: persistently truant and absent students, students with chronic behavioral problems (expelled/multi-suspended), substance abusers, children of substance abusers, etc. We recognize that most of these demographics are self-reported categories that cannot be consistently confirmed from prior school records, but we have learned that it is precisely *these* categories that make it difficult for students to learn and puts them at-risk for failure. We ask that since the AAS would be tailored to each school's unique needs, that the list of possible categories be expanded to include a more complete list of alternative categories and that each school be required to provide evidence that it is serving an "alternative" population. Schools should be required to collect student-reported data as necessary. At a minimum, the proposed PCSB policy could use the same K-12 categories as the proposed OSSE alternative education definition that will be used for per pupil funding. The proposed OSSE definition was drafted with

many stakeholders involved and schools that receive alternative education funding will already be required to provide the very same self-reported student data in order to receive per pupil funding.

Permit the AAS to Determine Accountability

Within the policy, PCSB staff acknowledges that standard accountability frameworks can be inappropriate for measuring a school serving a different population and more challenged than that of most schools. We wholeheartedly agree and believe that exploring another 0-100 accountability framework works against this very notion. We would like to see the AAS adopted and tailored to each school that seeks the designation first. If this accountability system works well, we see no reason to adopt another PMF-like framework that may or may not reflect the school's mission and objectives.

Preserve the Stability of Each School's Charter Goals Within Its Contract

The policy indicates that a school that adopt the AAS will amend its charter and replace its current goals with the AAS, but it should also be clear that a school will not be required to surrender any of the autonomy granted to it under its existing charter agreement. It is unclear from the policy if the AAS is subject to change over time as the PMF does. We believe that schools should not be required to adopt a mutable AAS, in exchange for stable, pre-determined 15-year charter goals. How long would the AAS designation last? What if the school population changes during the chartered fifteen-year period? How would accountability within the charter agreement be established if conditions or the student population changes?

Finally, we believe the PCSB staff should re-examine the 70% threshold for students with risk factors to ascertain if any existing schools could actually meet this threshold with unduplicated headcounts; our 2012-2013 estimates suggest that the Maya Angelou High School would actually not meet this percentage. We also think it would be helpful if the proposed policy denoted how long schools would keep the alternative designation and how often PCSB intends to audit a school's student population for such.

We appreciate the PCSB's important steps toward an accountability framework that would accurately hold us to a high standard. Thank you for your time and consideration.

Sincerely,



Heather Wathington, Ph.D.
Chief Executive Officer

Appendix E
DC Public Charter School Policy and Document Feedback Form
 Title: **Designation for Eligibility for Alternative Accountability Framework**
 Dates Open for Public Comment: December 16 – January 17

Source	Comment	PCSB Response	
Dr. Heather Wathington, Executive Director Maya Angelou PCS (MAPCS)	1. Expand the list of student risk factors. At a minimum, the proposed PCSB policy could use the same K-12 categories as the proposed OSSE alternative education definition that will be used for pupil funding.	<p>MAPCS recommended reviewing the list of risk factors that OSSE is proposing for pupil funding for alternative schools. Below is the rationale for including or excluding the risk factors suggested by OSSE:</p> <p>Risk Factor A District of Columbia resident</p> <p>Between the ages of 16 and 18; and up to the age of 24</p> <p>Under court supervision</p> <p>On long-term out of school suspension</p>	<p>PCSB Decision Not Included. This risk factor is redundant – schools already have to prove residency of their students.</p> <p>Not Included. This would eliminate any schools serving students younger than 16. This framework is intended to include any school that serves grades that fall between the traditional PK-12 system, with the ultimate aim of students earning a DC high school diploma.</p> <p>Included. This will include students affiliated with the following agencies: Child and Family Services Agency (CFSA), Department of Youth Rehabilitation Services (DYRS), Persons in Need of Supervision (PINS), on probation or on parole. This risk factor will be included pending receipt of data from OSSE and these agencies.</p> <p>Not Included. Current Students - One of the goals of alternative schools will be keeping students engaged in the program, hopefully preventing long term suspensions from occurring.</p>

Source	Comment	PCSB Response	
		Received multiple short-term out of school suspensions	<p>Incoming Students - We are only able to gather this information for students who have previously attended charter schools.</p> <p>Not Included.</p> <p>Current Students - One of the goals of alternative schools will be keeping students engaged in the program, hopefully preventing long term suspensions from occurring.</p>
		Has been expelled	<p>Incoming Students - We are only able to gather this information for students who have previously attended charter schools.</p> <p>Included. PCSB can verify this data point and will include if students were expelled from their previous school for federally-recognized reasons, such as bringing a firearm to school.</p>
		Seeking admission to a District public school or public charter school after withdrawing for a period of one or more terms, during which the student received no public or private instruction	<p>Not Included. PCSB does not have the capability of tracking student enrollment/withdrawal dates in non-charter schools.</p>
		Is chronically truant	<p>Not Included. During the 2012-13 school year, 29 campuses had a truancy rate of 25% or higher, with one campus at 65%.</p>
		Is committed to	<p>Included, but not as a separate</p>

Source	Comment	PCSB Response	
		<p>DYRS</p> <p>Has been incarcerated in an adult correctional facility</p> <p>Is pregnant or parenting</p> <p>Is receiving treatment for drug abuse</p> <p>Has a history of violence</p> <p>Is severely over-aged or under-credited</p>	<p>risk factor. This is summarized in the new “under court supervision” indicator.</p> <p>Included.</p> <p>Included.</p> <p>Not Included. PCSB has reservations about schools collecting data that could potentially violate a students’ rights.</p> <p>Not Included. This data cannot be verified by PCSB.</p> <p>Included.</p>
	<p>2. Permit the AAF to govern each school’s expectation without an additional PMF.</p>	<p>No Change to Policy. There are no plans for a universal framework for the AAF. Each school will negotiate goals aligned to the four major indicators (Student Progress, Student Achievement, Gateway/Postsecondary Readiness, Student Engagement) that are unique to its mission and school program. Every school approved to use the AAF will have a unique framework for which they are held accountable. As mentioned in the policy, staff intends to explore in the future whether there is a way to appropriately display results on a 0-100 scale.</p>	
	<p>3. Preserve the stability of charter goals in each school’s charter contract.</p>	<p>No Change to Policy. According to NACSA, “The charter contract is the central instrument of accountability. When alternative measures are used, they must be written into the contract in clear, unambiguous, measurable terms, agreed to by both the school and authorizer. “ If MAPCS is eligible to use the AAF, we will begin with a review of their existing charter goals to determine if some/all of them are eligible for the AAF framework. As mentioned earlier, once the AAF is approved, the school will amend its charter to replace its current goals and student achievement expectations with its AAF. Schools may elect to adopt additional goals within their charter which will be reported on annually.</p>	

Source	Comment	PCSB Response
	<p>4. Re-examine the 70% threshold for students with risk factors to ascertain if any existing schools could actually meet this threshold with unduplicated headcounts.</p>	<p>Change to Policy. PCSB will lower the threshold to 60% of students to ensure that schools can meet this threshold with unduplicated headcounts.</p>
	<p>5. Denote how long schools would keep the alternative designation and how often PCS intends to audit a school's student population for such.</p>	<p>Change to Policy. Schools will keep the alternative designation until the time of their next charter review or renewal. PCSB will collect student data from schools on these risk factors within the annual report and audit their data annually.</p>