

Lea Crusey
Board Chair

Michelle J. Walker-Davis, Ed.D.
Executive Director

March 21, 2024

Via Electronic Mail

Antoine D. Smith
Board Chair

Bobby Caballero
Interim Executive Director

Elsie Whitlow Stokes Community Freedom Public Charter School
3700 Oakview Terrace NE
Washington, DC 20017

Re: 25-Year Charter Review of Elsie Whitlow Stokes Community Freedom Public Charter School

Dear Dr. Smith and Mr. Caballero:

As you know, the DC Public Charter School Board (DC PCSB) must conduct a high-stakes review of a public charter school at least once every five years to determine whether the school's charter should be continued or revoked.¹ During the 2022-23 school year, DC PCSB conducted such a review of Elsie Whitlow Stokes Community Freedom Public Charter School (EW Stokes PCS). DC PCSB staff prepared a comprehensive review report to assess the performance of the school according to the standard required by the School Reform Act.²

On January 31, 2023, DC PCSB staff provided the school with a draft version of this report and allowed an opportunity for the school to respond. DC PCSB staff considered the school's feedback and incorporated it where staff determined appropriate to create a preliminary charter review report. Based on the findings in the preliminary charter review report, staff developed a proposal to present before the DC PCSB Board recommending the school's charter be continued.

¹ See DC Code § 38-1802.12(a)(3).

² See DC Code § 38-1802.13(a)-(b).



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At its public board meeting on February 27, 2023, the DC PCSB Board voted to continue the school's charter for the reasons outlined in the review report and accompanying proposal, incorporating and adopting the staff's findings and recommendations.

Representatives from the school were in attendance at the meeting and were provided an opportunity to address the DC PCSB Board prior to this vote. Members of the public were also allowed an opportunity to provide public comment prior to the vote.

Please see the following signed copy of the accompanying staff proposal, which outlines the basis upon which the DC PCSB Board voted to continue the school's charter along with the finalized version of the charter review report.

Thank you for your continued efforts in service of the students of the District of Columbia.

Sincerely yours,


Lea Crusey
Board Chair


Michelle J. Walker-Davis, Ed.D.
Executive Director

Cc: School Leaders

DISTRICT OF COLUMBIA PUBLIC CHARTER SCHOOL BOARD

Charter Actions Requiring a Vote

- ☐ Approve a Charter Application (15 yrs)
- ☐ Approve a Charter Renewal (15 yrs)
- ☒ Approve Charter Continuance
- ☐ Approve a Charter Amendment Request
- ☐ Give a Charter Notice of Concern
- ☐ Lift the Charter Notice of Concern
- ☐ Commence Charter Revocation Proceedings
- ☐ Revoke a Charter
- ☐ Board Action, Other _____

Non-Voting Board Items

- ☐ Public Hearing Item
- ☐ Discussion Item
- ☐ Read into Record

Policies

- ☐ Open a New Policy or Changes to a Policy for Public Comment
- ☐ Approve a New Policy
- ☐ Approve an Amendment to an Existing Policy

PREPARED BY: **Nada Mousa, Senior Specialist, School Performance Department**

SUBJECT: **Charter Review: Elsie Whitlow Stokes Community Freedom Public Charter School**

DATE: **February 27, 2023**

Recommendation

DC PCSB staff recommends that its Board vote to continue the charter of Elsie Whitlow Stokes Community Freedom Public Charter School (EW Stokes PCS). This recommendation aligns with our Strategic Roadmap Priority of Excellent Schools.¹

Charter Review Findings

DC PCSB staff conducted a 25-year charter review of EW Stokes PCS, as required by the School Reform Act (SRA).² The review includes an evaluation of the school's 1) progress toward meeting its goals and academic achievement expectations (charter goals); 2) compliance with its charter and applicable federal and local laws; and 3)

¹ DC PCSB is creating the policy and conditions to support a network of public charter schools in Washington, DC, offering families quality, equity, and diverse educational choices. See our Strategic Roadmap here: <https://bit.ly/3EVeKYg>.

² D.C. Code §§ 38-1802 *et seq.*

fiscal management. The chart below summarizes DC PCSB staff's findings in these three areas over the review period.

Charter Review Findings						
Review Period	School year (SY) 2017 – 18 through SY 2021 – 22					
Charter Goals	EW Stokes PCS met its charter goals.					
Compliance	EW Stokes PCS did not violate the law or materially violate its charter.					
Finance	EW Stokes PCS did not commit fiscal mismanagement.					
Performance Management Framework (PMF) Outcomes						
Campus	2017 – 18	2018 – 19	2019 – 20	2020 – 21	2021 – 22	Average
EW Stokes PCS – Brookland	70.2%	74.4%	NA ³			72.3%
EW Stokes PCS – East End	Not applicable (NA) ⁴	45.1%				NA

EW Stokes PCS adopted the PMF as its charter goals in accordance with DC PCSB's *Elect to Adopt the PMF as Charter Goals Policy (PMF as Goals Policy)*.⁵ In doing so, EW Stokes PCS committed to earning at least 55.0% of the possible PMF points in two of the most recent three years, and earning at least 45.0% in four of the previous five years. As the chart above shows, EW Stokes PCS – Brookland met its charter goals, earning well above the targeted PMF points throughout the review period. DC PCSB staff did not render a goal attainment determination for EW Stokes PCS – East End. The campus opened in SY 2018 – 19, and it only has one year of data prior to the COVID-19 pandemic. Per DC PCSB's *COVID-19 Impact Policy*,⁶ DC PCSB will not make a determination of goal attainment for schools or campuses with one or fewer years of pre-pandemic data.

³ As written in DC PCSB's *COVID-19 Impact Policy*, the "COVID-19 public health emergency resulted in all DC public charter schools physically closing and implementing distance learning programs." Consequently, per the policy, DC PCSB ceased collection, aggregation, and publication of SY 2019 – 20 academic data and did not produce the SY 2019 – 20 PMF. Similarly, though DC PCSB resumed collection of a limited set of SY 2020 – 21 PMF data, it did not produce the SY 2020 – 21 PMF. In September 2021, DC PCSB announced its plan to develop a revised accountability framework. Consequently, DC PCSB did not produce the SY 2021 – 22 PMF. For details, see the *COVID-19 Impact Policy* here: <https://bit.ly/3fy5zDo>. Also see DC PCSB's September 2021 public meeting materials and recorded discussion here: <https://bit.ly/3JpiB2x>.

⁴ EW Stokes PCS – East End did not open until SY 2018 – 19. As such, there are no PMF data to report for SY 2017 – 18.

⁵ See the *PMF as Goals Policy* here: <https://bit.ly/2PTj7fL>.

⁶ For details, see the *COVID-19 Impact Policy* here: <https://bit.ly/3fy5zDo>.

DC PCSB staff also found the school has not committed a violation of law or a material violation of its charter, and has not committed fiscal mismanagement, meaning the school has adhered to generally accepted accounting principles, has not engaged in a pattern of fiscal mismanagement, and is economically viable.

DC PCSB staff's complete findings are detailed in the school's Preliminary Charter Review Report (Attachment A), which forms the basis of staff's recommendation along with this proposal. The report will be finalized following the Board's vote on the school's continuance.

Additional Academic Data

To support evaluation during the COVID-19 recovery period, DC PCSB staff collected SY 2021 – 22 transitional goals data from all schools.⁷ For schools serving early childhood and elementary students like EW Stokes PCS,⁸ transitional goals data includes the following outcomes: growth on a nationally normed assessment, Partnership for Assessment of Readiness for College and Careers (PARCC) proficiency, achievement on early childhood assessments, attendance, re-enrollment, and Classroom Assessment Scoring System (CLASS). See EW Stokes PCS's SY 2021 – 22 transitional goals performance on pages 26 through 29 of the attached Preliminary Charter Review Report. Per the *COVID-19 Impact Policy*, DC PCSB uses SY 2021 – 22 transitional goals data as supplemental evidence of school performance, but only if it helps the school.⁹

In addition to collecting transitional goals data, DC PCSB staff conducted a Qualitative Site Review (QSR) at each EW Stokes PCS campus during SY 2021 – 22. DC PCSB uses the QSR to evaluate schools' environment and instructional quality. Like transitional goals data, QSR outcomes provide supplemental evidence of school quality. See EW Stokes PCS's SY 2021 – 22 QSR performance on pages 11 and 12 of the attached Preliminary Charter Review Report.

Charter Review Standard

The SRA stipulates that DC PCSB "shall review [a school's] charter at least once every [five] years."¹⁰ As part of this review, DC PCSB must determine whether:

1. The school committed a violation of applicable law or a material violation of the conditions, terms, standards, or procedures set forth in its charter, including violations relating to the education of children

⁷ See DC PCSB's transitional goals description in the *COVID-19 Impact Policy*, <https://bit.ly/3JCFwIQ>, p. 2.

⁸ In this context, "early childhood" refers to pre-kindergarten 3 and pre-kindergarten 4.

⁹ See the *COVID-19 Impact Policy* here: <https://bit.ly/3JCFwIQ>, p. 6.

¹⁰ D.C. Code § 38-1802.12(a)(3).

with disabilities; and/or

2. The school failed to meet the goals and student academic achievement expectations set forth in its charter.¹¹

If DC PCSB determines that a school has committed a violation of applicable law or a material violation of the terms of its charter, or has not met its goals and academic achievement expectations, it may, at its discretion, revoke the school's charter, or grant the school a continuance.¹²

Additionally, there is a fiscal component to the charter review. DC PCSB is required by the SRA to revoke a school's charter if DC PCSB determines in its review that the school: 1) has engaged in a pattern of nonadherence to generally accepted accounting principles, 2) has engaged in a pattern of fiscal mismanagement, and/or 3) is no longer economically viable.¹³

Background

EW Stokes PCS began operation in 1998 under authorization from the DC Board of Education (DC BOE).¹⁴ The school enrolls 667 students in pre-kindergarten 3 through fifth grade.¹⁵ The school operates across two facilities located in Wards 5 and 7. EW Stokes PCS's mission is to "prepare culturally diverse elementary school students in the District of Columbia to become leaders, scholars, and responsible citizens who are committed to social justice."

Notification

On January 9, 2023, DC PCSB staff notified Advisory Neighborhood Commissioners Colleen Costello (5B05) and Yolanda Fields (7C02) of the school's 25-year charter review. DC PCSB staff also posted a notice for public comment on the charter review in the DC Register and on the DC PCSB website.¹⁶

Attachment to this Proposal

Attachment A: EW Stokes PCS 25-Year Preliminary Charter Review Report

¹¹ D.C. Code § 38-1802.13(a).

¹² DC PCSB may impose conditions of continuance if it deems such conditions appropriate.

¹³ D.C. Code § 38-1802.13(b).

¹⁴ After the passage of the Public Education Reform Amendment Act in 2007, the DC BOE dissolved, and DC PCSB became the school's authorizer. See the Public Education Reform Amendment Act of 2007 here: <https://bit.ly/3r2b6WT>

¹⁵ This enrollment figure is based on preliminary, unvalidated data as of October 5, 2022.

¹⁶ See the notice here: <https://bit.ly/3WBSOKT>.

Date: **2/27/2023**

DC PCSB Action: **X** Approved ____ Approved with Changes ____ Rejected

Changes to the Original Proposal:

Signature of the DC PCS Board Chair:

Glen M. Cussey



2022 – 23 25-Year Charter Review Report Elsie Whitlow Stokes Community Freedom Public Charter School

February 27, 2023

DC Public Charter School Board
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BOARD VOTE AND KEY FINDINGS¹

Elsie Whitlow Stokes Community Freedom Public Charter School (EW Stokes PCS) ^{2, 3}						
Review or Renewal	25-year charter review					
Review Period	School year (SY) 2017 – 18 through SY 2021 – 22					
Charter Goals	EW Stokes PCS met its charter goals.					
Compliance	EW Stokes PCS did not violate the law or materially violate its charter.					
Finance	EW Stokes PCS did not commit fiscal mismanagement.					
Board Vote	The Board voted 6 – 0 to continue EW Stokes PCS's charter.					
Performance Management Framework (PMF) Outcomes ⁴						
Campus	2017 – 18	2018 – 19	2019 – 20	2020 – 21	2021 – 22	Average
EW Stokes PCS – Brookland	70.2%	74.4%	NA ⁵			72.3%
EW Stokes PCS – East End	Not Applicable (NA) ⁶	45.1%				NA

Pursuant to the School Reform Act (SRA), the DC Public Charter School Board (DC PCSB) “shall review [a school’s] charter at least once every [five] years.”⁷ As such, DC PCSB conducted a 25-year charter review of EW Stokes PCS, evaluating the school’s progress toward meeting its goals and academic achievement expectations (charter goals). EW Stokes PCS adopted the PMF as its charter goals, in accordance with DC PCSB’s *Elect to Adopt the PMF as Charter Goals Policy (PMF as Goals Policy)*.⁸ In doing so, EW Stokes PCS committed to earning at least 55.0% of the possible PMF points in two of the most recent three years and earning at least 45.0% in four of the previous five years. As the chart above shows, EW Stokes PCS – Brookland met its charter goals, earning well above the targeted PMF points throughout the review period. DC PCSB did not render a goal attainment determination for EW Stokes PCS – East End. The campus opened in SY 2018 – 19, and it

¹ To request a text-only and/or a black and white version of this report, please contact communications@dcpcs.org.

² See the appendices to this report here: <https://bit.ly/3rkhnys>.

³ See EW Stokes PCS’s Charter Agreement and Amendments, Appendices A1 – A5.

⁴ See EW Stokes PCS’s PMF scorecards, Appendices B1 – B3.

⁵ As written in DC PCSB’s *COVID-19 Impact Policy*, the “COVID-19 public health emergency resulted in all DC public charter schools physically closing and implementing distance learning programs.” Consequently, per the policy, DC PCSB ceased collection, aggregation, and publication of SY 2019 – 20 academic data and did not produce the SY 2019 – 20 PMF. Similarly, though DC PCSB resumed collection of a limited set of SY 2020 – 21 PMF data, it did not produce the SY 2020 – 21 PMF. In September 2021, DC PCSB announced its plan to develop a new accountability framework. Consequently, DC PCSB did not produce the SY 2021 – 22 PMF. For details, see the *COVID-19 Impact Policy* here: <https://bit.ly/3fy5zDo>. Also see DC PCSB’s September 2021 public meeting materials and recorded discussion here: <https://bit.ly/3JpiB2x>.

⁶ EW Stokes PCS – East End did not open until SY 2018 – 19. As such, there are no PMF data to report for SY 2017 – 18.

⁷ D.C. Code § 38-1802.12(a)(3).

⁸ See the *PMF as Goals Policy* here: <https://bit.ly/2PTj7fL>.

only has one year of data prior to the COVID-19 pandemic. Per DC PCSB's *COVID-19 Impact Policy*,⁹ DC PCSB will not make a determination of goal attainment for schools or campuses with one or fewer years of pre-pandemic data.

DC PCSB also evaluated the school's compliance with applicable federal and local laws, compliance with its charter, and fiscal management. DC PCSB determined the school has not committed a violation of law or a material violation of its charter, has adhered to generally accepted accounting principles (GAAP), has not engaged in a pattern of fiscal mismanagement, and is economically viable.

At its public board meeting on February 27, 2023, the DC PCSB Board voted 6 – 0 to continue EW Stokes PCS's charter.

The following report includes a school background section followed by analyses of the school's academic performance, charter and legal compliance, and fiscal management.

⁹ For details, see the *COVID-19 Impact Policy* here: <https://bit.ly/3JCFwIQ>.

SCHOOL BACKGROUND

EW Stokes PCS			
Year Opened	1998 – 99	Ward(s)	5 and 7
Number of Campuses	2	Year(s) of Previous Review	2003 – 04, 2011 – 12, 2012 – 13, and 2017 – 18
Chartered Grade Span	Pre-kindergarten 3 (PK3) – 12	Current Enrollment Ceiling	698
Current Enrollment and Grade Span ¹⁰			
EW Stokes PCS – Brookland		EW Stokes PCS – East End	
355, PK3 – 5		316, PK3 – 4	
Mission Statement			
EW Stokes PCS prepares culturally diverse elementary school students in the District of Columbia to become leaders, scholars and responsible citizens who are committed to social justice.			

School Overview

EW Stokes PCS began operation in 1998 under authorization from the DC Board of Education (DC BOE),¹¹ initially serving students in kindergarten (K) and first grade, with ultimate approval to enroll students through fifth grade. In 2008, the local education agency (LEA)¹² expanded to educate pre-kindergarten (PK) students.¹³ In July 2018, EW Stokes PCS opened a second campus: EW Stokes PCS – East End.¹⁴ The campus is growing, adding one grade level per year until it reaches maturation in SY 2023 – 24 with grades PK3 through fifth.

EW Stokes PCS offers a dual-language immersion curriculum at both of its campuses. EW Stokes PCS students in K through fifth grade receive half of their instruction in Spanish or French.¹⁵ PK students study French or Spanish for 90.0% of the instructional time, and the remaining 10.0% of the time is in English.¹⁶

In June 2014,¹⁷ EW Stokes PCS entered a consortium with four other bilingual public charter schools to jointly operate the District of Columbia International School (DCI).¹⁸ DCI is a

¹⁰ These enrollment figures are based on preliminary, unvalidated data as of October 5, 2022.

¹¹ After the passage of the Public Education Reform Amendment Act in 2007, DC BOE dissolved, and DC PCSB became the school's authorizer. See the Public Education Reform Amendment Act of 2007 here: <https://bit.ly/3rabBPX>.

¹² An "LEA" is any individual or group of public charter schools operating under a single charter.

¹³ See DC PCSB's EW Stokes PCS 2008 Grade Expansion proposal, Appendix C.

¹⁴ See EW Stokes PCS's 2018 Campus Location Amendment, Appendix A5.

¹⁵ See EW Stokes PCS's 2020 – 21 Annual Report, Appendix D, p. 1.

¹⁶ Ibid.

¹⁷ See EW Stokes PCS's 2014 DCI Operation Agreement Amendment, Appendix A2.

¹⁸ D.C. Code § 38-1802.01(c-1).

middle and high school program where consortium students have an enrollment preference. As such, EW Stokes PCS's rising sixth graders receive a transfer preference (through the My School DC lottery) to enroll at DCI. When EW Stokes PCS students matriculate from fifth grade and enroll in DCI, those students are no longer deemed enrolled at EW Stokes PCS.¹⁹ Thus, this charter review only reflects an analysis of EW Stokes PCS's early childhood and elementary program.

Enrollment and Demographic Data

EW Stokes PCS enrolls students from every ward in the District, though most of its students come from Wards 5 and 7. The tables below show the LEA's enrollment history.²⁰

School Year	2017 – 18	2018 – 19	2019 – 20	2020 – 21	2021 – 22
Audited Enrollment ²¹	350	484	538	583	621
Enrollment Projections ²²	350	490	542	588	631
Enrollment Ceiling ²³	350	490	542	594	646

School Year	2017 – 18	2018 – 19	2019 – 20	2020 – 21	2021 – 22
EW Stokes PCS – Brookland					
PK3	31	35	41	37	36
Pre-kindergarten 4 (PK4)	38	40	42	43	40
K	44	43	45	46	44
1	47	50	46	48	48
2	48	43	49	47	47
3	47	47	43	47	45
4	47	47	46	47	48
5	45	45	43	42	40
EW Stokes PCS – East End					
PK3	-	53	47	48	42
PK4	-	43	49	48	52
K	-	38	46	49	50
1	-	-	41	47	49
2	-	-	-	34	45
3	-	-	-	-	34

¹⁹ EW Stokes PCS has assigned all rights and responsibilities with respect to its middle and high school program to DCI.

²⁰ The “-” symbol notes campuses that do not or did not enroll the corresponding grade(s) or student group(s).

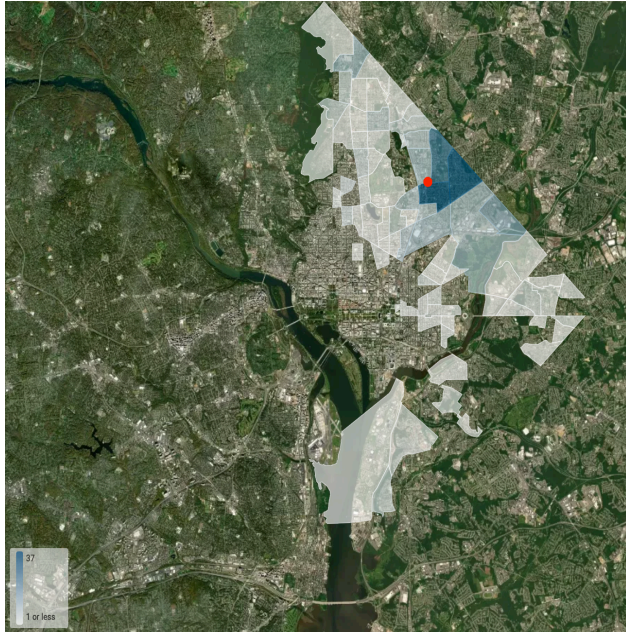
²¹ OSSE conducts an annual enrollment audit to determine the number of students at each public school in the District.

²² Each year, charter LEAs, DC PCSB, and the Office of the Deputy Mayor for Education (DME) must project student enrollment for the following school year. The enrollment projections displayed are determined by DME and DC PCSB and may be different than the LEA's projections.

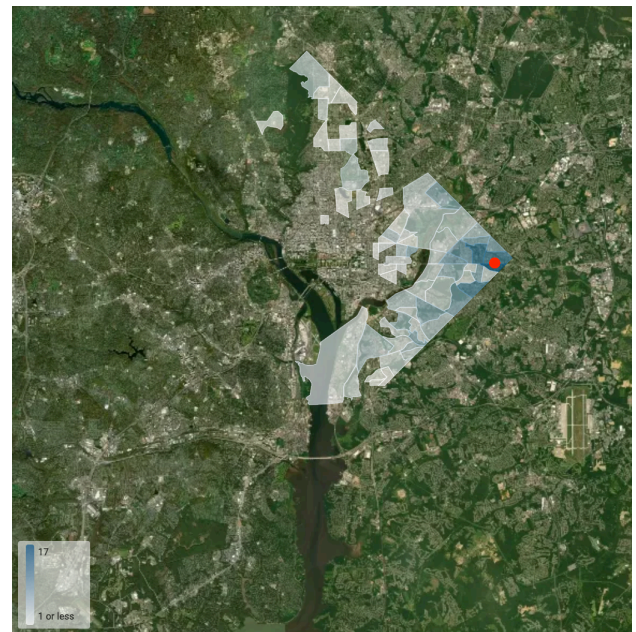
²³ Each charter LEA has an enrollment ceiling in its charter agreement, designating the maximum number of students the school can receive per pupil funding for each school year.

The maps below shows where SY 2021 – 22 EW Stokes PCS students live in relation to the campuses, which are marked by a red dot. The blue gradient represents the density of students. As the map shows, most EW Stokes PCS students come from Wards 5 and 7.

EW Stokes PCS – Brookland



EW Stokes PCS – East End



The chart below shows the school's student demographics in SY 2021 – 22.

Student Group	Percentage Enrolled
At-Risk Students²⁴	14.8%
English Learners²⁵	12.2%
Students with Disabilities (SWD)²⁶	10.7%
American Indian or Alaska Native	0.2%
Asian	0.8%
Black or African American	50.4%
Hispanic/Latino	14.4%
Multiracial	10.2%
Native Hawaiian or Other Pacific Islander	10.2%
White	23.5%

²⁴ D.C. Code § 38–2901(2A) defines “at-risk” as a DCPS student or a public charter school student who is identified as one or more of the following: a) homeless; b) in the District’s foster care system; c) qualifies for the Temporary Assistance for Needy Families program or the Supplemental Nutrition Assistance Program; or d) a high school student who is one year older, or more, than the expected age for the grade in which the student is enrolled.

²⁵ English learners are students whose native language is a language other than English. An English learner may have difficulty speaking, reading, writing, or understanding the English language.

²⁶ SWD are students identified as having an Individualized Education Program (IEP) that details the special education services the students must receive. For demographic data, DC PCSB counts any student who was identified as SWD through the year in the final calculation.

School Climate

The charts below report EW Stokes PCS's performance across three school environment measures: out-of-school suspension (OSS) rates, mid-year withdrawal (MYW) rates, and in-seat attendance (ISA) rates. DC PCSB presents these measures by applicable student groups and compares them to the relevant student groups within the DC public charter sector. These data do not factor into DC PCSB's continuance determination. Still, isolating school environment measures by student groups helps to identify whether there may be access and opportunity disparities.²⁷

OSS Rates

An OSS is when a school temporarily removes a student from school grounds for disciplinary reasons. The OSS rate is the percentage of students who received an OSS. The charts below detail EW Stokes PCS's average OSS rates by grade band and student group compared to the DC public charter sector's average OSS rates.²⁸

Key for OSS and MYW Rates	
Green	Equal to or less than the sector rate
Red	More than the sector rate
Grey	n < 10; the number of students (n-size) is less than 10 ²⁹

Two-Year (SY 2017 – 18 and SY 2018 – 19) Average OSS Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
EW Stokes PCS	PK3 – PK4	0.0%	0.0%	0.0%
Sector		0.0%	0.0%	0.2%
EW Stokes PCS	K – 5	15.1%	7.9%	10.3%
Sector		8.8%	1.8%	12.2%

²⁷ The following school climate charts do not include SY 2019 – 20, SY 2020 – 21, and SY 2021 – 22 data in the multi-year average values. The COVID-19 pandemic made these years unique and difficult to compare to other years. Consequently, DC PCSB shares two-year averages (SY 2017 – 18 and SY 2018 – 19) as well as standalone outcomes for SY 2019 – 20, SY 2020 – 21, and SY 2021 – 22 in this section of the report. Additionally, rates for SY 2019 – 20 include data from August 2019 through February 2020. DC PCSB ceased collecting OSS, MYW, and ISA data after March 2020 in response to the pandemic.

²⁸ For SY 2020 – 21, DC PCSB determined the number of students suspended across the charter sector, including EW Stokes PCS, is too small to report.

²⁹ DC PCSB does not report values when the n-size is less than 10.

SY 2019 – 20 Average OSS Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
EW Stokes PCS	PK3 – PK4	0.0%	0.0%	0.0%
Sector		0.0%	0.0%	0.0%
EW Stokes PCS	K – 5	2.6%	4.2%	5.5%
Sector		3.5%	0.4%	5.2%

SY 2021 – 22 Average OSS Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
EW Stokes PCS	PK3 – PK4	0.0%	0.0%	0.0%
Sector		0.0%	0.0%	0.0%
EW Stokes PCS	K – 5	0.0%	0.0%	0.0%
Sector		2.4%	0.4%	4.0%

MYW Rates

The MYW rate is the percentage of students who have withdrawn from school during the school year. The charts below detail EW Stokes PCS's average MYW rates by grade band and student group compared to the DC public charter sector's average MYW rates.

Two-Year (SY 2017 – 18 and SY 2018 – 19) Average MYW Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
EW Stokes PCS	PK3 – PK4	6.7%	0.0%	0.0%
Sector		5.8%	4.4%	3.6%
EW Stokes PCS	K – 5	4.1%	2.2%	1.6%
Sector		4.6%	2.4%	3.8%

SY 2019 – 20 Average MYW Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
EW Stokes PCS	PK3 – PK4	2.8%	0.0%	0.0%
Sector		3.7%	4.7%	2.9%
EW Stokes PCS	K – 5	0.0%	0.0%	4.6%
Sector		2.9%	2.3%	3.1%

SY 2020 – 21 Average MYW Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
EW Stokes PCS	PK3 – PK4	0.0%	0.0%	0.0%
Sector		3.6%	3.7%	3.2%
EW Stokes PCS	K – 5	0.0%	0.0%	5.1%
Sector		1.6%	1.4%	1.4%

SY 2021 – 22 Average MYW Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
EW Stokes PCS	PK3 – PK4	5.0%	0.0%	0.0%
Sector		6.9%	4.6%	4.1%
EW Stokes PCS	K – 5	6.5%	0.0%	0.0%
Sector		5.0%	2.9%	3.9%

ISA Rates

The ISA rate is the percentage of students who were present each day. The charts below detail EW Stokes PCS's data by grade band and student group compared to the DC public charter sector's average ISA rates.

Key for ISA Rates	
Green	Equal to or more than the sector rate
Red	Less than the sector rate
Grey	n < 10; the n-size is less than 10

Two-Year (SY 2017 – 18 and SY 2018 – 19) Average ISA Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
EW Stokes PCS	PK3 – PK4	89.5%	94.6%	91.3%
Sector		88.1%	91.7%	90.5%
EW Stokes PCS	K – 5	91.7%	94.1%	91.6%
Sector		91.7%	94.9%	92.0%

SY 2019 – 20 Average ISA Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
EW Stokes PCS	PK3 – PK4	88.4%	92.5%	95.2%
Sector		88.6%	91.5%	90.3%
EW Stokes PCS	K – 5	93.1%	93.9%	94.7%
Sector		92.3%	94.9%	92.9%

SY 2020 – 21 Average ISA Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
EW Stokes PCS	PK3 – PK4	62.9%	84.4%	88.1%
Sector		72.0%	85.1%	79.1%
EW Stokes PCS	K – 5	86.4%	94.9%	91.9%
Sector		85.7%	92.8%	87.8%

SY 2021 – 22 Average ISA Rates				
School/Sector	Grade Band	At-Risk Students	English Learners	Students with Disabilities
EW Stokes PCS	PK3 – PK4	80.3%	86.9%	90.1%
Sector		77.5%	85.6%	81.7%
EW Stokes PCS	K – 5	84.7%	93.6%	91.4%
Sector		81.9%	90.6%	84.8%

Qualitative Site Review (QSR)

DC PCSB uses QSR visits to assess schools across two domains—classroom environment and instruction, as defined in the Charlotte Danielson *Framework for Teaching*.³⁰ From April 18 – 29, 2022, in anticipation of this review, DC PCSB conducted a QSR at each EW Stokes PCS campus.³¹ In the classroom environment domain, across both campuses, observers noted respectful and caring interactions between teachers and students and among students. In some classrooms, DC PCSB observed students helping each other speak the targeted language and assisting one another with challenging work. In the instruction domain, across both campuses, observers noted that most teachers clearly stated lesson objectives and frequently checked for student understanding using multiple methods. Across the EW Stokes PCS – Brookland campus, students engaged in rigorous learning tasks that encouraged higher order thinking. Teachers frequently posed open-

³⁰ Danielson, Charlotte. *The Framework for Teaching: Evaluation Instrument*. Princeton, NJ: Danielson Group, 2013.

³¹ See EW Stokes PCS QSR Report, Appendices E1 – E2.

ended questions, inviting students to think and offer multiple possible answers. Across the EW Stokes PCS – East End campus, teachers frequently posed close-ended questions, which limited student participation and engagement in academic conversations.

After conducting unannounced observations,³² the QSR team rates the classroom environment and instruction as “unsatisfactory,” “basic,” “proficient,” or “distinguished.” The following chart details the percentage of EW Stokes PCS classrooms the QSR team rated as proficient or distinguished in each domain. It also reports the average percentage of comparable public charter school classrooms in SY 2021 – 22 that received proficient and distinguished ratings in each domain.

Campus/Sector	Classroom Environment	Instruction
Percentage Rated Proficient or Distinguished		
EW Stokes PCS – Brookland	93.0%	88.0%
EW Stokes PCS – East End	82.0%	71.0%
Average score for PK – 8 public charter schools	89.0%	80.0%

Compared to other PK – 8 schools that received a QSR during SY 2021 – 22, EW Stokes PCS – Brookland scored above average in both domains, and EW Stokes PCS – East End scored below average in both domains.

In addition to conducting classroom observations, DC PCSB and The New Teacher Project (TNTP) consultants reviewed sample ELA and math assignments EW Stokes PCS students received. Evaluators used TNTP’s *Assignment Review Protocol* in assessing whether the assignments: 1) aligned with grade-appropriate standards, 2) provided students with meaningful practice opportunities, and 3) gave students an opportunity to connect academic standards to real-world issues.³³ Upon review, evaluators rated each assignment as “sufficient,” “minimal,” or “no opportunity,” describing the opportunity students had to meaningfully engage in worthwhile grade-level content.³⁴

Of the 10 ELA samples EW Stokes PCS submitted, four assignments received an overall rating of “sufficient.” These assignments reached the depth of grade-level standards and allowed students an opportunity to use their voice. Six assignments received an overall rating of “minimal.” Some of these assignments did not reach the depth of the targeted

³² During SY 2021 – 22 QSR visits, the QSR team observed 50.0% of a school’s core content classes. The QSR team also observed electives when the coursework was an essential part of the school’s mission.

³³ See the protocol here: <https://bit.ly/3PFYKXH>.

³⁴ Specifically, assignments that satisfied TNTP’s *Assignment Review Protocol* criteria were deemed “sufficient.” Assignments that partially satisfied the criteria were deemed “minimal.” Assignments that did not satisfy the criteria were deemed “no opportunity.”

grade-level standard, while others were not based on a high-quality, grade-appropriate text.

Of the 10 math samples EW Stokes PCS submitted, six assignments received an overall rating of “sufficient.” These assignments reached the depth of the targeted grade-level standard and allowed students to apply math concepts in a meaningful way. Three assignments received an overall rating of “minimal.” These assignments contained questions that did not reach the depth of the targeted grade-level standard. Further, these assignments did not allow students to apply math to the real world in a meaningful way. One assignment received an overall rating of “no opportunity.” This task did not reach the depth of the grade-level standard, and it did not allow students to engage in math practices at the appropriate depth.

Previous Charter Reviews

Five-Year Review

In SY 2003 – 04, DC BOE conducted a five-year review of EW Stokes PCS and found the school met the standard for charter continuance.³⁵ DC BOE determined the school met two out of three academic standards and all non-academic and organizational performance standards.

10-Year Review

In SY 2011 – 12,³⁶ DC PCSB conducted a 10-year review of EW Stokes PCS and found the school met the standard for charter continuance.³⁷ DC PCSB determined the LEA met all academic and non-academic review standards. In December 2011, DC PCSB voted to continue EW Stokes PCS’s charter.

15-Year Renewal

In SY 2012 – 13, DC PCSB conducted a 15-year renewal of EW Stokes PCS and found the school met the standard for renewal.³⁸ DC PCSB determined the LEA met 20 out of 22 charter goals. DC PCSB did not issue a determination for two of the LEA’s goals due to insufficient evidence.³⁹ The 15-year renewal report noted the school’s strong performance on its mission-specific goals, “including promoting students’ physical health, creating a diverse and culturally respectful school community, and instilling a sense of community service in students.” In December 2012, DC PCSB voted to renew EW Stokes PCS’s charter for another 15-year term.

³⁵ See EW Stokes PCS’s Five-Year Review Report, Appendix F.

³⁶ As previously noted, EW Stokes PCS was initially under DC BOE’s authority. When DC BOE dissolved in 2007, DC PCSB became the school’s authorizer. Instead of conducting the school’s 10-year review in 2007 as previously planned, DC PCSB conducted it in 2011.

³⁷ See EW Stokes PCS’s 10-year Review Report, Appendix G.

³⁸ See EW Stokes PCS’s 15-year Renewal Report, Appendix H.

³⁹ Ibid., p. 2.

20-Year Review

In SY 2017 – 18, DC PCSB conducted a 20-year review of EW Stokes PCS and found the school met the standard for charter continuance.⁴⁰ Ahead of its 20-year review, the LEA adopted the PMF as its goals. In doing so, EW Stokes PCS agreed to achieve an average PMF score equal to or exceeding 55.0% of the possible PMF points in two of the most recent three years and earning at least 45.0% in four of the previous five years. DC PCSB determined the LEA met its goals. In January 2018, DC PCSB voted to continue EW Stokes PCS's charter.

Communication with the School

In June 2022, DC PCSB staff met with EW Stokes PCS staff to discuss the school's 25-year review. DC PCSB staff provided the school with a chart, similar to the one in Section One of this report, showing the school's charter goals performance during the review period.

⁴⁰ See EW Stokes PCS's 20-year Review Report, Appendix I.

CHARTER REVIEW STANDARD

The SRA stipulates that DC PCSB "shall review [a school's] charter at least once every [five] years."⁴¹ As part of this review, DC PCSB must determine whether:

- 1) The school committed a violation of applicable law, or a material violation of the conditions, terms, standards, or procedures set forth in its charter, including violations relating to the education of children with disabilities; and/or
- 2) The school failed to meet the goals and student academic achievement expectations set forth in its charter.⁴²

If DC PCSB determines that a school has committed a violation of applicable law or a material violation of the terms of its charter, or has not met its goals and academic achievement expectations, it may, at its discretion, revoke the school's charter, or grant the school a continuance.⁴³

Additionally, there is a fiscal component to the charter review. DC PCSB is required by the SRA to revoke a school's charter if DC PCSB determines in its review that the school: 1) has engaged in a pattern of nonadherence to GAAP, 2) has engaged in a pattern of fiscal mismanagement, and/or 3) is no longer economically viable.⁴⁴

⁴¹ D.C. Code § 38-1802.12(a)(3).

⁴² D.C. Code § 38-1802.13(a).

⁴³ DC PCSB may impose conditions of continuance if it deems such conditions appropriate.

⁴⁴ D.C. Code § 38-1802.13(b).

SECTION ONE: GOALS AND ACADEMIC ACHIEVEMENT EXPECTATIONS

Per the SRA, DC PCSB must review whether a school has met its charter goals at least once every five years. Charter goals are part of the review analysis only if they were included in a school's charter or charter amendment.

In May 2016,⁴⁵ EW Stokes PCS adopted the PMF as its charter goals.⁴⁶ By adopting the PMF as its goals, the LEA agreed to the review standard recorded in the chart below. This chart also reports DC PCSB's determination that EW Stokes PCS met its charter goals.

Charter Goals	
Review Standard: At its 25-year review, the school will need to have earned at least 55.0% of the possible PMF points in at least two of the most recent three years, and 45.0% in four of the previous five years in operation to be deemed as having met its goals and student academic achievement expectations during this review.	
Improvement Provision: In cases where a school has not achieved the above threshold, the DC PCSB Board may, at its discretion, determine that a school has met its goals and student academic achievement expectations if the School Corporation has demonstrated consistent improvement on overall [PMF] scores over the five-year period. In exercising its discretion, the DC PCSB Board shall also consider the strength of un-tiered measures. ⁴⁷	
Campus	Met?
EW Stokes PCS – Brookland	Met
EW Stokes PCS – East End	Unable to Determine ⁴⁸

⁴⁵ See EW Stokes PCS's Goals Charter Amendment, Appendix A3.

⁴⁶ For details, see the 2019 – 20 PMF Policy & Technical Guide here: <https://bit.ly/2D2lvqc>.

⁴⁷ "Un-tiered measures" refers to measures included in the PMF that do not count in the PMF score and resulting tier.

⁴⁸ As previously noted, EW Stokes PCS – East End opened in SY 2018 – 19, and it only has one year of data prior to the COVID-19 pandemic. Per DC PCSB's COVID-19 Impact Policy, DC PCSB will not make a determination of goal attainment for schools with one or fewer years of pre-pandemic data. For details, see the COVID-19 Impact Policy here: <https://bit.ly/3fy5zDo>.

PMF Outcomes					
Campus	2017 – 18	2018 – 19	2019 – 20	2020 – 21	2021 – 22
EW Stokes PCS – Brookland	70.2%	74.4%	NA ⁴⁹		
EW Stokes PCS – East End	NA	45.1%			

Determination: EW Stokes PCS met its charter goals, earning above the required PMF score each year during the review period where a score is available.

The remainder of this section contains a description of the PMF and an analysis of EW Stokes PCS's performance on each PMF category during the review period, excluding school years 2019 – 20, 2020 – 21, and 2021 – 22 per footnote 49. This section ends with supplemental academic data, separate and apart from the school's charter goals.

PMF Overview⁵⁰

DC PCSB evaluates all public charter schools according to a PMF. There are four separate PMF frameworks; DC PCSB evaluates EW Stokes PCS under the Early Childhood, Elementary School, and Middle School PMF (PK – 8 PMF). DC PCSB divides the PMF into four categories: student progress, student achievement, gateway, and school environment. Using a 100-point scale, the PK – 8 PMF identifies schools as Tier 1 (high-performing), Tier 2 (mid-performing), or Tier 3 (low-performing) based on their overall performance in the four categories. See below for a summary of EW Stokes PCS's outcomes in the PMF categories,⁵¹ including charts detailing the school's performance compared to the sector.⁵²

Student Progress

Student progress is a measure of student growth over the course of a school year. For schools ending in grades 4 – 8, like EW Stokes PCS – Brookland, DC PCSB uses the median growth percentile (MGP) on the PARCC, DC's state assessment, as the growth measure. An MGP of 50 indicates that a school's students have average year-to-year growth compared to other DC students in the same grades and with the same initial state assessment performance. The charts below detail the school's MGP performance compared to the

⁴⁹ DC PCSB ceased collection, aggregation, and publication of SY 2019 – 20 academic data and did not produce the SY 2019 – 20 PMF. Similarly, though DC PCSB resumed collection of a limited set of SY 2020 – 21 and SY 2021 – 22 PMF data, it did not produce the PMF for either school year. Consequently, DC PCSB assesses schools under review in SY 2022 – 23 using data prior to the COVID-19 pandemic. For details, see the *COVID-19 Impact Policy* here: <https://bit.ly/3fy5zDo>.

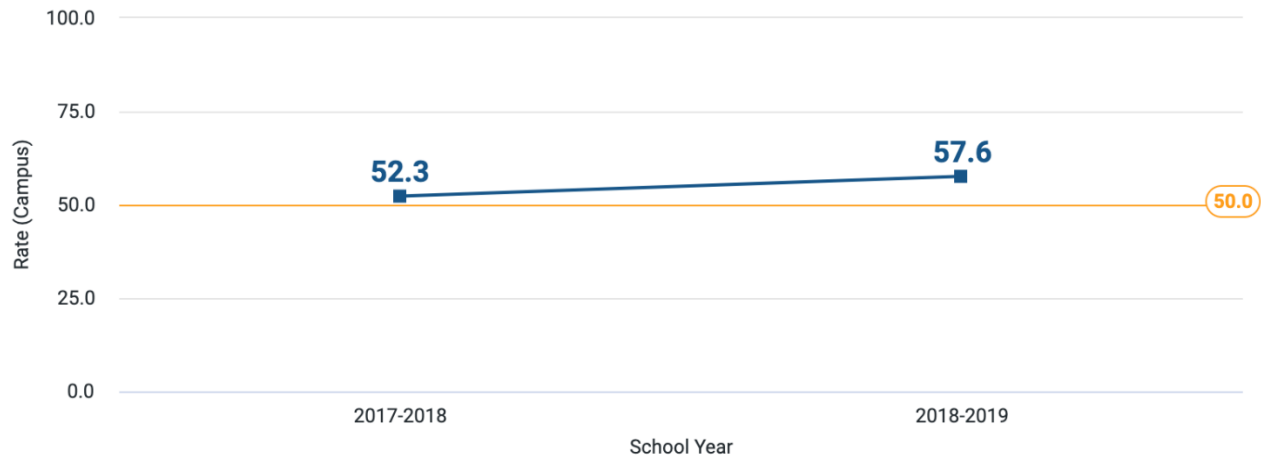
⁵⁰ For details, see the *2019 – 20 PMF Policy and Technical Guide* here: <https://bit.ly/2D2lvqc>.

⁵¹ Again, EW Stokes PCS – East End opened in SY 2018 – 19 with students in PK3 through K. That year, the campus was subject to nine PMF measures. Comparatively, EW Stokes PCS – Brookland, having opened in SY 1998 – 99 and enrolling students in PK3 through 5 in SY 2018 – 19, was subject to 17 PMF measures. As such, there are fewer measures to display in this report for EW Stokes PCS – East End than EW Stokes PCS – Brookland.

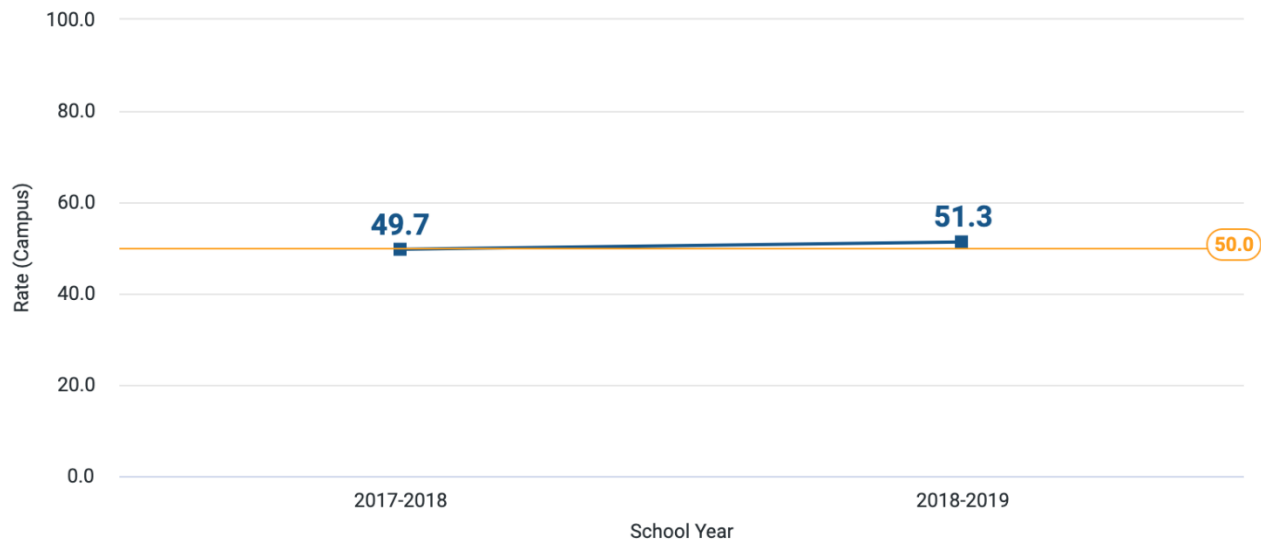
⁵² The phrase “compared to the sector” here and throughout this section of the report refers to the average performance achieved by all DC public charter schools evaluated under the corresponding PMF.

standard of 50. For schools ending in grades K – 3, like EW Stokes PCS – East End, DC PCSB uses the median of the school’s NWEA MAP student level conditional growth percentile (CGP) as the growth measure. CGP assesses the relative year-to-year progress made by individual students at a school. The median CGP is set by the publisher’s norms, based on the student’s initial assessment score and grade. A median CGP of 50.0 indicates that a school’s students have average year-to-year growth when compared to students nationwide in the same grades and with the same initial assessment performance.

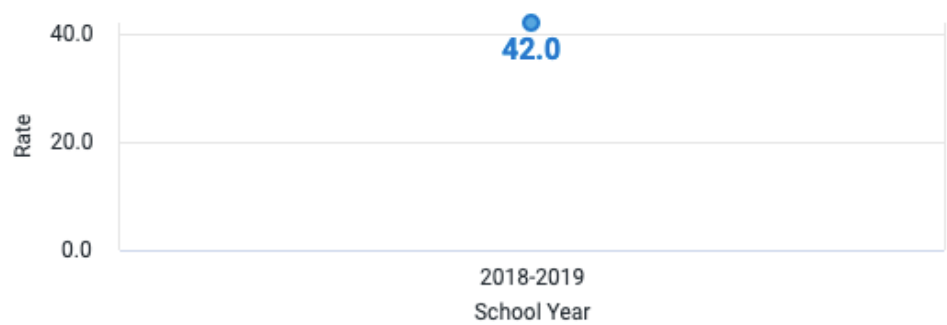
EW Stokes PCS – Brookland’s ELA MGP



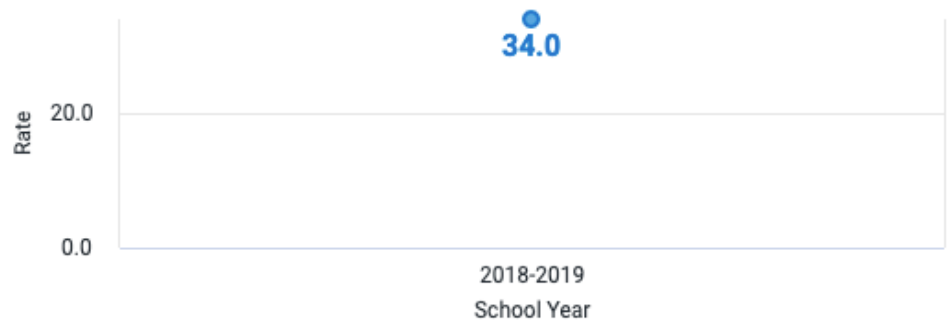
EW Stokes PCS – Brookland’s Math MGP



EW Stokes PCS – East End’s ELA CGP



EW Stokes PCS – East End’s Math CGP



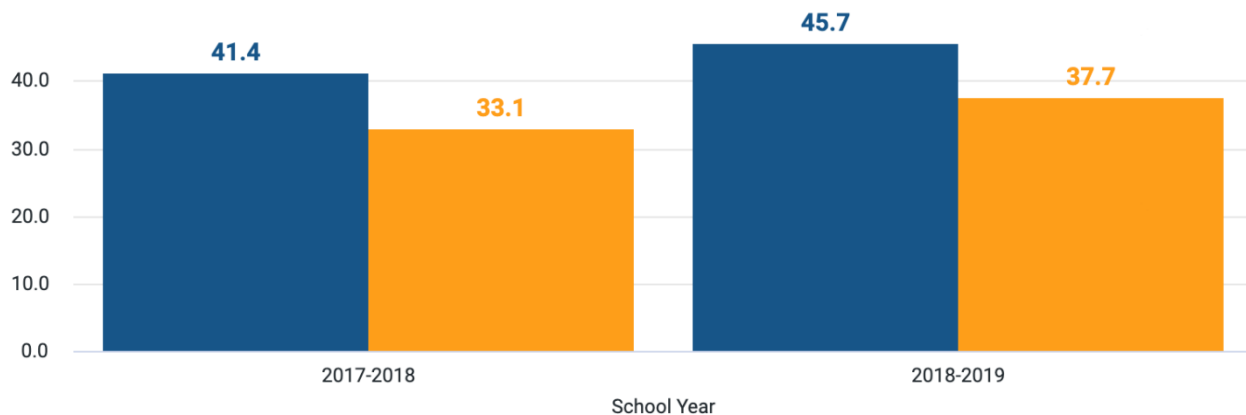
Student Achievement

The student achievement category captures overall student performance on the PARCC assessment, with level 4+ considered proficient and advanced.⁵³ This category includes overall performance in both ELA and math as compared to the sector average for students in the same grade band. The charts below detail the school's ELA and math achievement performance compared to the sector.

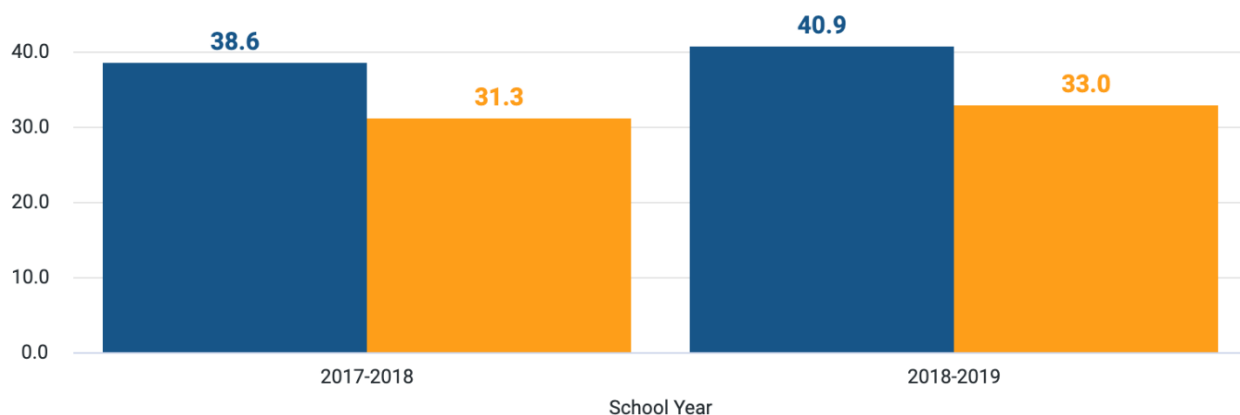
Key for Data Charts	
● Rate (Campus)	● Rate (Sector)

⁵³ The term “4+” refers to level 4 and level 5 PARCC scores. A student who earns a level 4 is considered proficient. A student who earns a level 5 is considered advanced.

EW Stokes PCS – Brookland’s ELA Proficiency (Overall)



EW Stokes PCS – Brookland’s Math Proficiency (Overall)



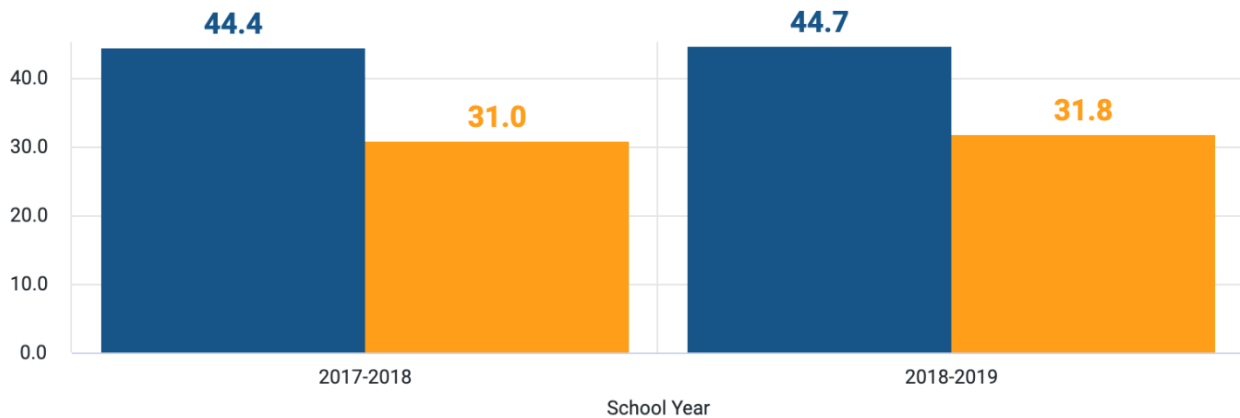
Gateway

The gateway category includes grade-specific measures that predict students' future academic performance. The PK – 8 PMF gateway measure that applies to EW Stokes PCS is described below.

3rd Grade ELA

This measure reports the percentage of 3rd graders who have attended the LEA for at least two full academic years, who either achieved 4+ scores on the PARCC assessment or earned a 3 or above on the Multi-State Alternate Assessment (MSAA) in ELA. The chart below reports the school's 3rd grade ELA performance compared to the sector average.

EW Stokes PCS – Brookland’s 3rd Grade ELA



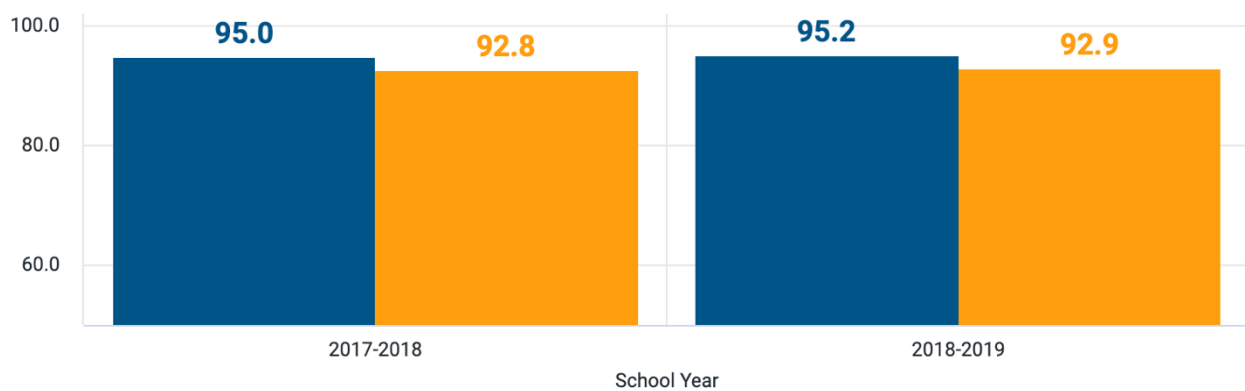
School Environment

The school environment category includes in-seat attendance rates and re-enrollment rates, as well as CLASS scores for schools that serve PK students. The following charts detail the school's performance on each of these measures. Though DC PCSB resumed collection of a limited set of SY 2020 – 21 and SY 2021 – 22 data, it did not calculate or publicly report any PMF measures, including ISA, re-enrollment, and CLASS.

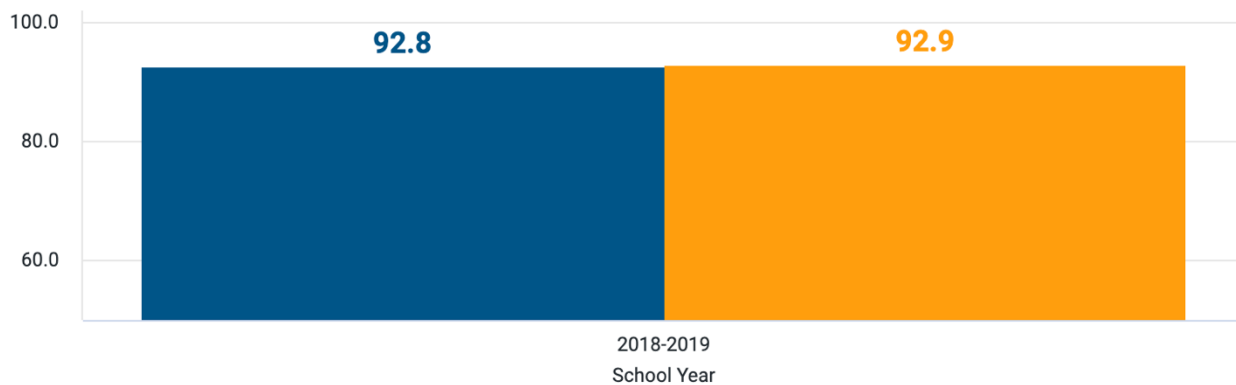
ISA

The ISA rate measures the percentage of students who were present each day. The charts below detail the school's ISA performance compared to the charter sector.

EW Stokes PCS – Brookland’s ISA



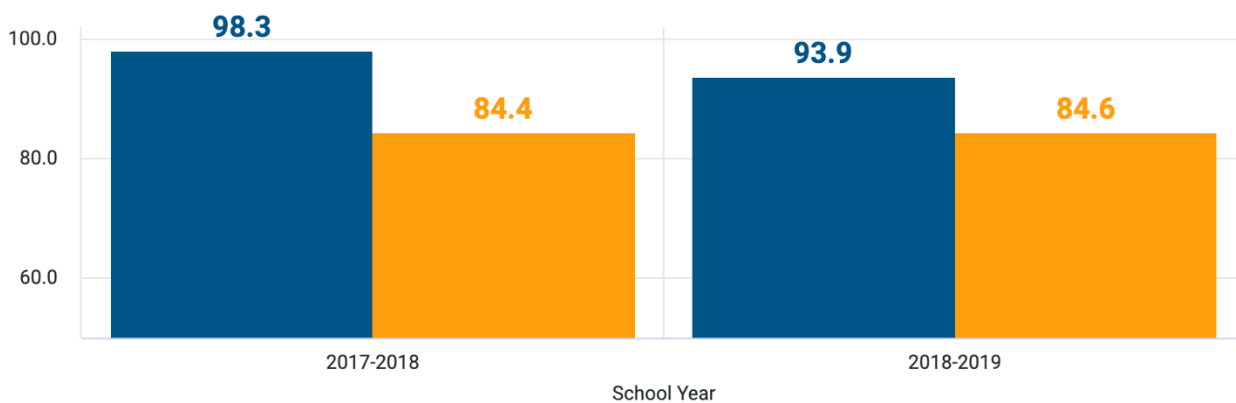
EW Stokes PCS – East End’s ISA



Re-enrollment

The re-enrollment rate measures the percentage of eligible students who return to the school the following year.⁵⁴ EW Stokes PCS’s re-enrollment rate was well above the charter sector average each year. The chart below reports the school's re-enrollment rates compared to the charter sector.

EW Stokes PCS – Brookland’s Re-enrollment



CLASS

DC PCSB uses CLASS to evaluate PK classrooms.⁵⁵ The charts below display the school's performance in CLASS each year. Per the publisher's guidance, a high CLASS score is 6.0 or above.

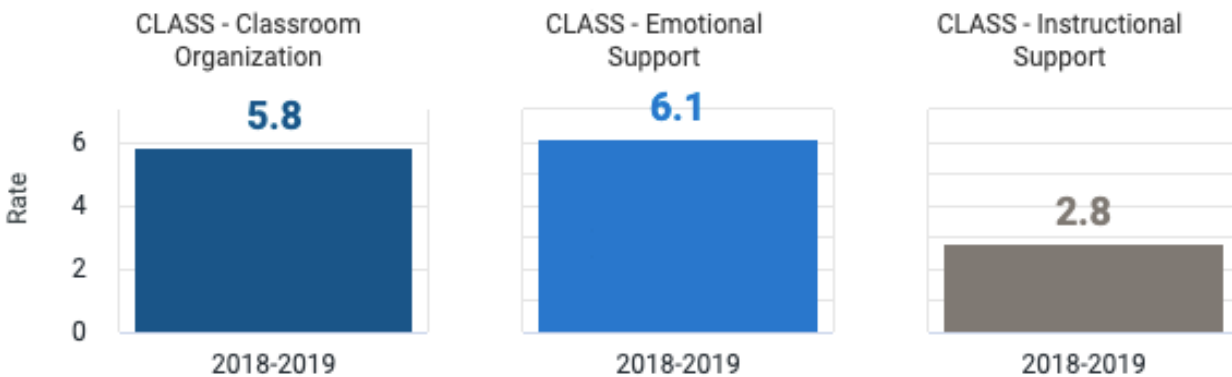
⁵⁴ For eligibility criteria, see the 2019 – 20 PMF Policy & Technical Guide here: <https://bit.ly/3aRYFW2>.

⁵⁵ For reference, the CLASS scores are assigned as follows: low scores are 1 or 2, mid scores are from 3 to 5, and high scores are 6 or 7. For details, please see: <https://bit.ly/3j2d1X4>.

EW Stokes PCS – Brookland’s CLASS Score



EW Stokes PCS – East End’s CLASS Score

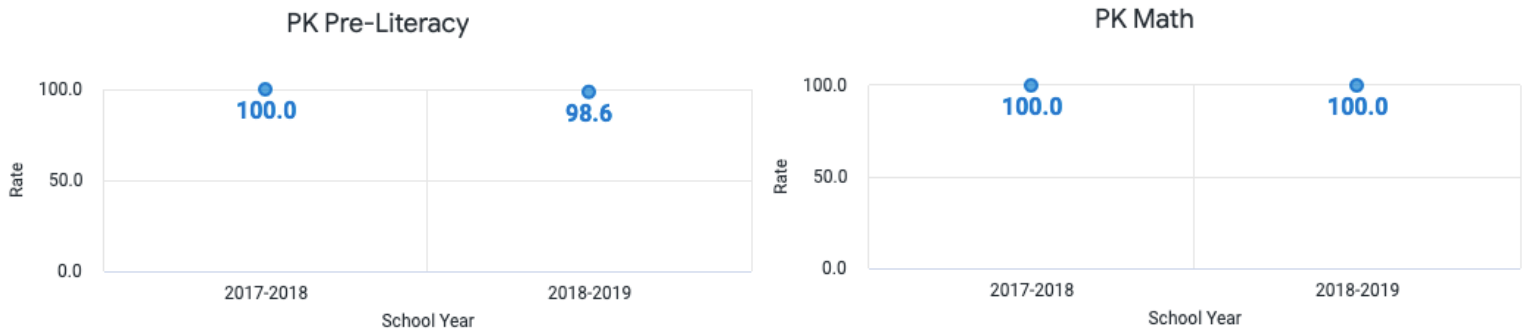


Early Childhood Assessments

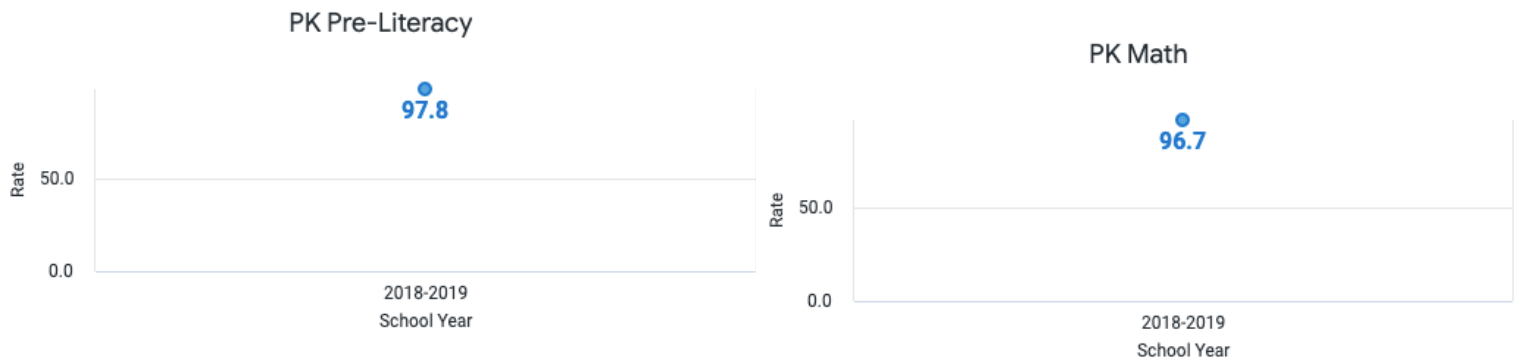
Each public charter school that serves early childhood grades selects its own DC PCSB-approved assessments to use with PK – 2 students. These measures do not factor into the school’s PMF score. EW Stokes PCS uses GOLD assessments for PK3 and PK4 students.⁵⁶ It uses NWEA MAP for K – 2 students. The charts below report the school’s early childhood outcomes.

⁵⁶ For more information on the GOLD assessment see, <https://bit.ly/3VsfuNO>.

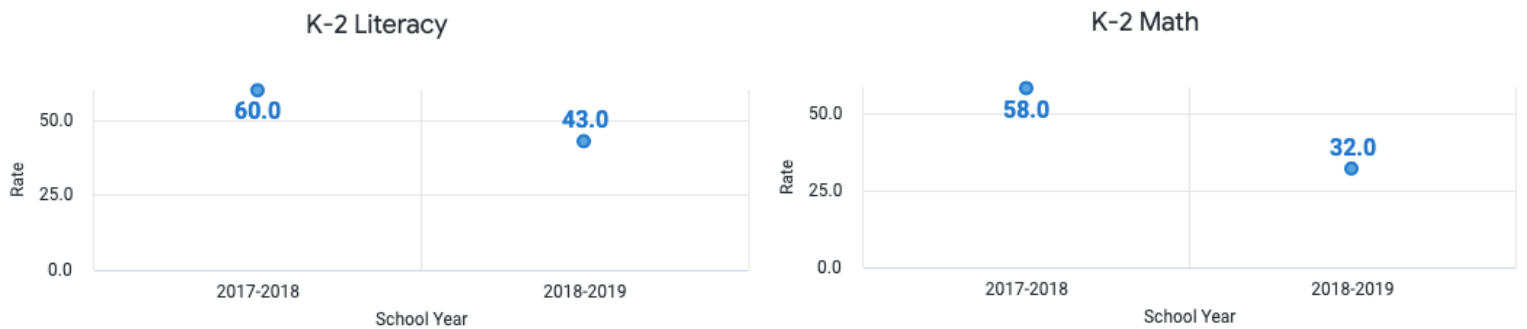
EW Stokes PCS – Brookland’s PK Pre-Literacy and Math



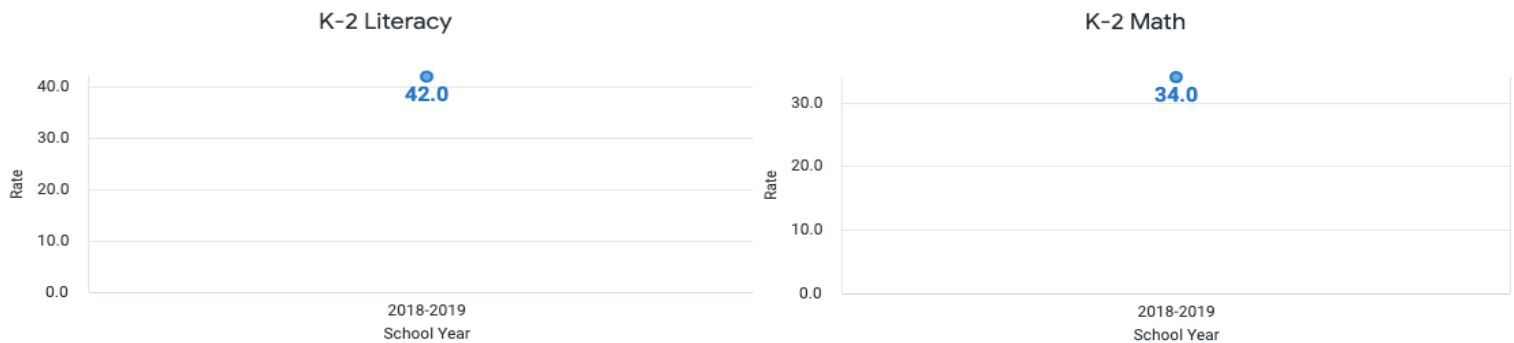
EW Stokes PCS – East End’s PK Pre-Literacy and Math



EW Stokes PCS – Brookland’s K – 2 Literacy and Math



EW Stokes PCS – East End’s K – 2 Literacy and Math



Additional Academic Data

Student Group Academic Data

The following charts present academic data by student group. Student group academic performance does not individually factor into the school's PMF score, and it does not factor into DC PCSB's charter goals analysis. However, it provides additional context, showing how the school serves different student populations. The charts below show the LEA's academic data by campus in both growth and achievement compared to the sector average for that student group. The following charts do not display student group categories that were not part of the LEA's overall student population or that had less than 10 test takers in both SY 2017 – 18 and SY 2018 – 19.

Key for Student Group Data Charts	
Green	Greater than the charter sector average for the same grade band
Red or <5.0%	Less than the charter sector average for the same grade band or the data is suppressed in cases of sensitive and negative rates less than 5.0%
Blue	Equal to the charter sector average for the same grade band
Grey	The number of test takers (n-size) is less than 10

EW Stokes PCS – Brookland’s ELA MGP Growth Rates by Student Group

School Year	2017 – 18		2018 – 19	
Student Group	School Rate	Sector Rate	School Rate	Sector Rate
At-Risk	40.0%	44.5%	41.9%	47.4%
English Learner	46.5%	52.1%	n < 10	51.0%
SWDs	30.8%	39.6%	34.0%	43.5%
Black or African American	49.1%	44.5%	54.4%	48.9%
Hispanic/Latino	51.7%	51.6%	64.2%	53.5%
White	51.1%	54.5%	43.8%	59.3%
Female	57.1%	50.1%	62.0%	54.0%
Male	42.0%	42.5%	47.3%	47.0%

EW Stokes PCS – Brookland's Math MGP Growth Rates by Student Group

School Year	2017 – 18		2018 – 19	
Student Group	School Rate	Sector Rate	School Rate	Sector Rate
At-Risk	45.1%	46.0%	47.5%	46.0%
English Learner	38.9%	47.9%	n < 10	49.1%
SWDs	36.9%	43.0%	33.6%	44.5%
Black or African American	53.6%	47.0%	50.3%	47.5%
Hispanic/Latino	47.2%	50.4%	47.9%	50.5%
White	56.9%	60.0%	61.7%	60.5%
Female	54.5%	50.0%	58.4%	51.5%
Male	47.0%	47.0%	47.0%	47.0%

EW Stokes PCS – Brookland's ELA PARCC (4+) Proficiency Rates by Student Group

School Year	2017 – 18		2018 – 19	
Student Group	School Rate	Sector Rate	School Rate	Sector Rate
At-Risk	10.0%	21.8%	<5.0%	25.0%
English Learner	17.1%	16.4%	<5.0%	12.0%
SWDs	9.1%	5.8%	10.0%	9.0%
Black or African American	36.8%	28.3%	41.4%	32.6%
Hispanic/Latino	27.9%	33.3%	30.0%	35.6%
White	60.9%	77.9%	58.6%	79.3%
Female	50.0%	39.2%	61.1%	44.9%
Male	30.6%	26.7%	28.8%	30.3%

EW Stokes PCS – Brookland's Math PARCC (4+) Proficiency Rates by Student Group

School Year	2017 – 18		2018 – 19	
Student Group	School Rate	Sector Rate	School Rate	Sector Rate
At-Risk	15.0%	21.3%	<5.0%	22.6%
English Learner	11.4%	15.8%	6.7%	14.0%
SWDs	13.6%	7.2%	15.0%	8.9%
Black or African American	33.3%	27.4%	28.1%	28.7%
Hispanic/Latino	18.6%	25.5%	23.3%	27.4%
White	69.6%	75.6%	72.4%	74.5%
Female	46.2%	32.9%	47.2%	35.3%
Male	29.0%	29.6%	33.8%	30.7%

ACCESS for English Language Learners 2.0 (ACCESS) Growth

ACCESS is DC's annual English language proficiency assessment for grades K through 12. The test measures the English language development of students identified as English learners across four domains: listening, reading, speaking, and writing. Students identified as English learners must test every year until they score a 5.0 or higher, indicating proficiency. In its School Transparency and Reporting (STAR) Framework, OSSE calculates the percentage of English learners making progress in achieving English language proficiency as measured by their performance on the ACCESS test. OSSE reports ACCESS growth for schools with 10 or more eligible test takers.

The following chart shows the percentage of English learners at EW Stokes PCS – Brookland who demonstrated language proficiency growth relative to the state average.⁵⁷

EW Stokes PCS – Brookland ACCESS Growth									
2017 – 18		2018 – 19		2019 – 20		2020 – 21		2021 – 22	
School	State	School	State	School	State	School	State	School	State
45.2%	50.9%	27.3%	37.1%	NA ⁵⁸					

Transitional Goals Data

Per the COVID-19 Impact Policy, DC PCSB collected SY 2021 – 22 transitional goals data from all schools to support evaluation during the COVID-19 recovery period.⁵⁹ For schools serving K – 8 students, transitional goals data includes results from a school-selected, nationally normed growth assessment. EW Stokes PCS elected to administer NWEA MAP as its growth assessment. Transitional goals data also includes standard data collection, to the extent available, of PARCC (4+), performance on early childhood assessments,⁶⁰ ISA, re-enrollment, and CLASS performance. The charts below show the school's overall and student group performance on each transitional goals measure.

⁵⁷ Again, EW Stokes PCS – East End opened in SY 2018 – 19 with students in PK3 through K. The first year of available ACCESS data for EW Stokes PCS – East End would have been SY 2019 – 20; however, the COVID-19 pandemic interrupted ACCESS testing that year. Consequently, there are ACCESS data to report for EW Stokes PCS – East End.

⁵⁸ For SY 2019 – 20 and SY 2020 – 21, ACCESS testing was interrupted due to the COVID-19 pandemic; therefore, data are not available. While schools administered ACCESS in SY 2021 – 22, ACCESS growth rates are not available because growth calculations require data from the prior school year.

⁵⁹ See DC PCSB's transitional goals description in the *COVID-19 Impact Policy*, <https://bit.ly/3JCFwIQ>, p. 2.

⁶⁰ In this context, "early childhood" refers to PK3 and PK4.

K – 2 ELA and Math NWEA MAP Growth by Student Group

Campus	Student Group	2021 – 22 Median Conditional Growth Percentile (CGP) ⁶¹		
		n-size	ELA	Math
EW Stokes PCS – Brookland	All Students	139	36.5	36.0
	At-Risk	n < 10	n < 10	n < 10
	English Learner	19	48.0	31.0
	SWDs	20	65.0	41.0
	Black or African American	41	22.0	20.0
	Hispanic/Latino	26	51.5	33.5
	White	53	43.0	34.0
	Other Races	14	38.5	58.5
	Female	69	32.0	21.0
	Male	64	43.5	39.5

3 – 5 ELA and Math NWEA MAP Growth by Student Group

Campus	Student Group	2021 – 22 CGP		
		n-size	ELA	Math
EW Stokes PCS – Brookland	All Students	132	39.5	43.5
	At-Risk	17	13.0	13.0
	English Learner	28	19.0	12.0
	SWDs	21	66.0	11.0
	Black or African American	53	25.0	32.0
	Hispanic/Latino	27	28.0	17.0
	White	37	52.0	57.0
	Other Races	15	52.0	50.0
	Female	62	38.5	36.5
	Male	70	40.0	45.0

K – 3 ELA and Math NWEA MAP Growth by Student Group

Campus	Student Group	2021 – 22 Median CGP		
		n-size	ELA	Math
	All Students	182	25.0	21.0
	At-Risk	46	16.0	6.0

⁶¹ As previously noted, CGP typically assesses the relative year-to-year progress made by individual students at a school. Each student's CGP is set by the publisher's norms, based on the student's initial assessment score and grade-level. A median CGP of 50 indicates that a school's students have average year-to-year growth when compared to students nationwide in the same grades and with the same initial assessment performance. Due to the COVID-19 pandemic, DC PCSB calculated CGP using students' fall-to-spring scores.

Campus	Student Group	2021 – 22 Median CGP		
		n-size	ELA	Math
EW Stokes PCS – East End	English Learner	16	26.0	49.5
	SWDs	26	6.5	23.5
	Black or African American	128	25.5	19.0
	Hispanic/Latino	17	37.0	25.0
	White	13	46.0	41.0
	Other Races	16	<5.0	14.5
	Female	77	25.0	21.0
	Male	96	24.5	22.5

ELA and Math PARCC (4+) Proficiency Rates by Student Group

Campus	Student Group	2021 – 22 Proficiency Rates	
		ELA	Math
EW Stokes PCS – Brookland	All Students	37.4%	30.5%
	At-Risk	11.8%	11.8%
	English Learner	<5.0%	14.3%
	SWDs	15.0%	10.0%
	Black or African American	21.2%	13.5%
	Hispanic/Latino	18.5%	25.9%
	White	64.9%	59.5%
	Other Races	60.0%	26.7%
	Female	43.5%	25.8%
	Male	31.9%	34.8%
EW Stokes PCS – East End	All Students	21.2%	24.2%
	At-Risk	n < 10	n < 10
	English Learner	n < 10	n < 10
	SWDs	n < 10	n < 10
	Black or African American	22.7%	13.6%
	Hispanic/Latino	n < 10	n < 10
	White	n < 10	n < 10
	Other Races	n < 10	n < 10
	Female	15.4%	46.2%
	Male	25.0%	10.0%

PK Pre-Literacy, Math, and Social Emotional Learning GOLD Rates by Student Group

Campus	Student Group	2021 – 22 Pre-Literacy, Math, and Social Emotional Learning Rates		
		Pre-Literacy	Math	Social Emotional
EW Stokes PCS – Brookland	All Students	97.3%	97.3%	96.0%
	At-Risk	n < 10	n < 10	n < 10
	English Learner	n < 10	n < 10	n < 10
	SWDs	n < 10	n < 10	n < 10
	Black or African American	100%	100%	95.8%
	Hispanic/Latino	100%	100%	100%
	White	93.1%	93.1%	93.1%
	Other Races	100%	100%	100%
	Female	97.4%	97.4%	97.4%
	Male	97.2%	97.2%	94.4%
EW Stokes PCS – East End	All Students	82.4%	90.1%	92.3%
	At-Risk	80.0%	80.0%	86.7%
	English Learner	60.0%	70.0%	80.0%
	SWDs	n < 10	n < 10	n < 10
	Black or African American	82.1%	92.9%	92.9%
	Hispanic/Latino	66.7%	75.0%	83.3%
	White	100%	100%	100%
	Other Races	81.8%	81.8%	90.9%
	Female	89.8%	98.0%	100%
	Male	73.8%	81.0%	83.3%

ISA

Campus	2021 – 22 ISA Rates
EW Stokes PCS – Brookland	93.7%
EW Stokes – East End	89.3%

Re-enrollment

Campus	2021 – 22 Re-enrollment Rates
EW Stokes PCS – Brookland	88.9%
EW Stokes PCS– East End	76.0%

CLASS⁶²

Campus	2021 – 22 CLASS Scores		
	Classroom Organization	Emotional Support	Instructional Support
EW Stokes PCS – Brookland	5.9	6.0	2.8
EW Stokes PCS – East End	5.5	5.7	2.5

⁶² As previously noted, CLASS scores are assigned as follows: low scores are 1 or 2, mid scores are from 3 to 5, and high scores are 6 or 7. For details, please see: <https://bit.ly/3j2d1X4>.

SECTION TWO: COMPLIANCE WITH CHARTER AND APPLICABLE LAWS

Per the SRA, when reviewing a charter, DC PCSB must determine whether a school has "committed a violation of applicable laws or a material violation of the conditions, terms, standards, or procedures set forth in its charter, including violations relating to the education of children with disabilities."⁶³ The SRA contains a non-exhaustive list of applicable laws, which DC PCSB monitors in its annual compliance reviews. Since SY 2017 – 18, EW Stokes PCS has been compliant with all applicable laws as captured in DC PCSB's compliance reviews.⁶⁴

DC PCSB also monitors schools' compliance with the procurement requirements in the SRA, and supports OSSE, as the state education agency (SEA), in its monitoring of compliance with special education laws.

The remainder of this section examines the school's compliance in these two areas over the review period.

Procurement Contracts

D.C. Code § 38-1802.04(c)(1) requires DC charter schools to use a competitive bidding process for any procurement contract valued at \$25,000 or more. Within three business days of awarding such a contract, schools must submit to DC PCSB all bids received, the contractor selected, and the rationale for which contractor was selected. To ensure compliance with this law, DC PCSB requires schools to report key contract information specifying any qualifying procurement contract that the school has executed.

During fiscal year (FY) 2018, EW Stokes PCS properly reported 18 procurement contract packages, but did not properly report one procurement package. After communicating with the school, the school properly submitted all relevant documentation.

In early 2018, DC PCSB developed more robust and comprehensive oversight processes around procurement contracts. As a result, in July 2018, DC PCSB began implementing a new *Procurement Contract Submission and Conflict of Interest Policy*,⁶⁵ which tracks the timeliness of procurement contract submissions. Schools were then expected to adjust their internal processes over time to ensure higher levels of compliance with procurement contract reporting requirements.

During FY 2019, EW Stokes PCS reported 17 procurement contract packages. However, the school received two Early Warning Notices for failure to report contracts in a timely manner. After communication between DC PCSB and the school, EW Stokes PCS properly

⁶³ D.C. Code § 38-1802.12(a)(3).

⁶⁴ See EW Stokes PCS's Compliance Review Reports, Appendices J1 – J5.

⁶⁵ See the *Procurement Contract Submission and Conflict of Interest Policy* here: <https://bit.ly/3R5Mitl>.

submitted all relevant documentation. During FY 2020, the school reported three procurement contract packages. During FY 2021, the school reported 13 procurement contract packages.

Currently, DC PCSB has no major concerns about the LEA's compliance with procurement contract submission requirements; however, DC PCSB recommended the school strengthen its internal bidding and reporting processes to ensure late submission trends do not recur.

Special Education Compliance⁶⁶

Charter schools are required to comply with all federal and local special education laws, including the Individuals with Disabilities Education Act (IDEA)⁶⁷ and Section 504 of the Rehabilitation Act of 1973.⁶⁸ As the SEA, OSSE monitors charter schools' compliance with special education laws and shares detailed findings in eight areas captured in the table below.⁶⁹

Of the seven monitored areas,⁷⁰ EW Stokes PCS was required to take corrective action in two areas during the review period. DC PCSB compared this performance to other charter LEAs in DC and, based on this comparison, determined the school did not have notable instances of noncompliance in any of the monitored areas. Further information on OSSE's special education compliance findings is reported in the remainder of this section.

OSSE Special Education Compliance Review Areas	EW Stokes PCS Compliant All Years of the Review Period	Status of Corrective Action
1. Annual Determinations	Yes	NA
2. On-Site Monitoring	Yes	NA
3. IDEA Procedural Timeliness Monitoring a) Initial Evaluation b) Reevaluation c) Part C to B transition Timeliness	No	Complete
4. Child Find Monitoring	No	In progress

⁶⁶ See OSSE's Glossary of Special Education Compliance Terms, Appendix K.

⁶⁷ 20 U.S.C. §§ 1400 *et seq.* See 20 U.S.C. § 1413(a)(5).

⁶⁸ 29 U.S.C. § 794.

⁶⁹ For a description of each review area, see the Special Education Factsheet, Appendix L.

⁷⁰ Schools that enroll students who are 14 years of age or older meet the criteria for Secondary Transition Monitoring and therefore are monitored in eight compliance areas. Schools that enroll only younger students are monitored in seven compliance areas.

OSSE Special Education Compliance Review Areas	EW Stokes PCS Compliant All Years of the Review Period	Status of Corrective Action
5. Disproportionate Representation and Significant Discrepancy Review	Yes	NA
6. Significant Disproportionality Review	Yes	NA
7. Hearing Officer Determination and State Complaint Implementation Review	Yes	NA

1. Annual Determinations

Each year, OSSE analyzes each LEA's compliance with special education requirements and issues its findings in an Annual Determination report to the LEA. As the table below shows, EW Stokes PCS received a "Meets Requirements" designation in its 2017 through 2020 determinations.

Year	Percent Compliant with Audited Special Education Federal Requirements	Determination Level
2017	85.1%	Meets Requirements
2018	81.2%	Meets Requirements
2019	84.2%	Meets Requirements
2020	89.5%	Meets Requirements

2. On-Site Monitoring Report

OSSE conducts on-site monitoring visits at select LEAs to determine whether they are compliant with federal and local laws and regulations (including special education and related service requirements). OSSE has not flagged EW Stokes PCS for on-site monitoring during the review period.

3. IDEA Procedural Timeliness

OSSE monitors schools in three areas related to the timeliness of creating and maintaining compliant Individualized Education Programs (IEPs) for students: Initial Evaluation, Reevaluation and, Part C to B Transition Timeliness.

Initial Evaluation⁷¹

An initial evaluation is a process used to assess a student to determine whether a student has a disability and, if so, the nature and extent of the special education and

⁷¹ See EW Stokes PCS's Initial Evaluation Reports, Appendices M1 – M7.

related services the student needs to access the general education curriculum. OSSE identified EW Stokes PCS for noncompliance for failure to adhere to the required timeline for initial evaluation during the following periods:

- July 1, 2017 – June 30, 2018
- July 1, 2018 – December 30, 2018
- January 1, 2019 – June 30, 2019
- July 1, 2019 – September 30, 2019
- January 1, 2020 – March 31, 2020
- April 1, 2020 – June 30, 2020
- July 1, 2020 – June 30, 2021

For comparison, across the last five years, EW Stokes PCS performed better than 3.1% of charter LEAs, receiving a finding in seven reporting periods out of the 11 applicable reporting periods.⁷² OSSE confirms the school has addressed findings between SY 2017 – 18 and SY 2021 – 22.

Reevaluation⁷³

A reevaluation is used to determine whether a student with an identified disability still has a disability. Schools must conduct a reevaluation for each student with a disability once every three years. OSSE identified EW Stokes PCS for noncompliance for not adhering to the required timeline for reevaluation during the following periods:

- July 1, 2018 – September 30, 2018
- October 1, 2018 – March 31, 2019
- October 1, 2021 – March 31, 2022

For comparison, across the last five years, EW Stokes PCS performed better than 64.4% of charter LEAs, receiving a finding in three reporting periods out of the 11 applicable reporting periods.⁷⁴ OSSE confirms the school has addressed the SY 2018 – 19 and SY 2021 – 22 findings.

Part C to B Transition Timeliness

Part C to B Transition refers to transitioning children who receive early intervention services in IDEA Part C (birth through age two) to IDEA Part B special education services (age three to 21) by the child's third birthday. OSSE has not flagged EW Stokes PCS for Part C to B Transition timeliness noncompliance during the review period.

⁷² Out of the 11 total reporting periods, the LEA with the highest number of reporting periods with a finding for Initial Evaluation Timeliness had a finding in eight.

⁷³ See EW Stokes PCS's Reevaluation Reports, Appendices N1 – N3.

⁷⁴ Out of the 13 total reporting periods, the LEA with the highest number of reporting periods with a finding for Reevaluation Timeliness had a finding in 11.

4. Child Find Monitoring Report⁷⁵

Child Find is a set of policies, procedures, and public awareness activities designed to locate, identify, and evaluate students who may require special education and related services. OSSE reviewed and flagged EW Stokes PCS for Child Find noncompliance in SY 2018 – 19 and SY 2019 – 20, as seen in the tables below.

In SY 2018 – 19 and onwards, OSSE began conducting two separate Child Find reviews: one for the entire special education population at the school and the other focused on the 3- to 5-year-old special education population.

Year	Special Education Population Monitored	Percentage Identified	Corrective Action Required	Corrected?
2018	3- to 5-year-old	6.0	No Action Required	NA
2019	3- to 5-year-old	5.8	<ul style="list-style-type: none">• Submit policy• Participate in a webinar• Receive technical assistance	Yes
2020	3- to 5-year-old	4.9	Continue to actively participate in OSSE-facilitated targeted technical assistance (TTA), focusing on the timely transition of 3- to 5-year-old students which includes Child Find	In Progress

For comparison, in SY 2018 – 19 and SY 2019 – 20, OSSE flagged all charter LEAs with a 3- to 5-year-old population for an identification rate lower than the 8.5% threshold. OSSE required the LEAs to take corrective action. During SY 2020 – 21, EW Stokes PCS was one of 16 LEAs serving 3- to 5-year-old students OSSE required to complete TTA. While OSSE did not flag EW Stokes PCS for its overall identification rate in SY 2018 – 19 or SY 2019 – 20, the school has a comparatively low identification rate for 3- to 5-year-old special education students. OSSE confirms the school has completed the corrective action steps required for the SY 2019 – 20 findings and is currently participating in TTA.

5. Disproportionate Representation Review and Significant Discrepancy Review

OSSE annually reviews whether LEAs have overidentification or disproportionate representation by race and ethnicity of their identified students with disabilities. OSSE

⁷⁵ See EW Stokes PCS's Child Find Focused Monitoring Reports, Appendices O1 – O4.

determined EW Stokes PCS does not have disproportionate representation during the review period.

Significant Discrepancy Review

OSSE annually reviews LEAs' rates of suspension and expulsion for students with disabilities as compared to their non-disabled peers. OSSE determined EW Stokes PCS does not have significant discrepancy during the review period.

6. Significant Disproportionality Review

OSSE annually reviews LEAs for significant disproportionality based on race or ethnicity in an LEA with respect to the identification of children as children with disabilities, the identification of children in specific disability categories, the placement of children with disabilities in particular educational settings, or the taking of disciplinary actions. OSSE determined EW Stokes PCS does not have significant disproportionality during the review period.

7. Hearing Officer Determination (HOD) Implementation Review

Parents of students with disabilities may file complaints with OSSE as it relates to student-specific issues and systemic issues. Student-specific complaints are known as due process complaints, and systemic complaints are known as state complaints. When necessary, OSSE conducts hearings to resolve disagreements identified via parent complaint. OSSE issues a written HOD after each due process hearing, detailing its findings along with any actions the LEA must fulfill. OSSE then oversees the timely implementation of actions required by HODs. No HODs have been issued against EW Stokes PCS during the review period.

State Complaints

Any individual or organization may submit a written complaint that claims that any District of Columbia public agency has failed to comply with a requirement of Part B or Part C of the IDEA or the District's laws and regulations regarding special education. Such laws include the identification, evaluation, educational placement of the child, and the provision of a Free and Appropriate Public Education (FAPE) to such child. No state complaints have been filed against EW Stokes PCS during the review period.

SECTION THREE: FISCAL MANAGEMENT AND ECONOMIC VIABILITY⁷⁶

The SRA requires DC PCSB to revoke a school's charter if DC PCSB determines the school:

- has engaged in a pattern of nonadherence to GAAP;
- has engaged in a pattern of fiscal mismanagement; and/or
- is no longer economically viable.⁷⁷

DC PCSB collectively and holistically assessed the school's financial performance and condition by reviewing:

- the school's audited financial statements for FY 2017 through FY 2021;
- the school's unaudited financial statements for FY 2022;
- the school's annual budgets for FY 2022 and FY 2023; and
- DC PCSB's Financial Analysis Report (FAR) of EW Stokes PCS for FY 2017 through FY 2021.⁷⁸

Summary of Findings⁷⁹

EW Stokes PCS has demonstrated adequate fiscal performance during the review period. Its financial audits confirm 1) the school's financial statements comply with GAAP, 2) the school has adequate internal accounting controls, and 3) the school is financially solvent and able to pay its outstanding obligations if the school's charter were to be revoked or not renewed. The school is economically viable and has not engaged in a pattern of fiscal mismanagement.

Strengths and Deficiencies

- Most of the school's key performance indicators at fiscal year-end (FYE) 2021 were above target. The negative or marginal changes in net assets in FY 2017, FY 2019, and FY 2020 are not a cause for concern as they highlight how the school fully uses its funds to carry out its operations. Change in net assets margins remained above the -5% floor during the five-year period, and primary reserve ratio showed a 28% increase from FY 2017 to FY 2021.
- In each of the five FYs from FY 2017 to FY 2021, the school enrolled at least 98% of its enrollment ceiling.
- As a percentage of total operating expenses, the school spends more than the sector median on salaries and benefits, and less than the sector median on occupancy and general expenses.
- The debt ratio slightly outside the target range is not a cause for concern, as the school has sufficient liquidity to meet its upcoming payments.

⁷⁶ Each percentage in Section Three of this report has been rounded to the nearest whole percentage.

⁷⁷ See D.C. Code § 38-1802.13(b).

⁷⁸ See EW Stokes PCS's FAR Reports, Appendices P1 – P2.

⁷⁹ See Financial Definitions and Examples, Appendix Q.

Key for Finance Data	
Comparison to FAR Benchmarks	What This Means in the Following Tables
Within target range	Generally strong financial position
Outside of target range	Possibly more imminent financial concerns; operations may not be adequately managed, sustainable, and/or economically viable; closer monitoring warranted

Definitions and examples for each key performance indicator used herein are provided in Appendix Q.

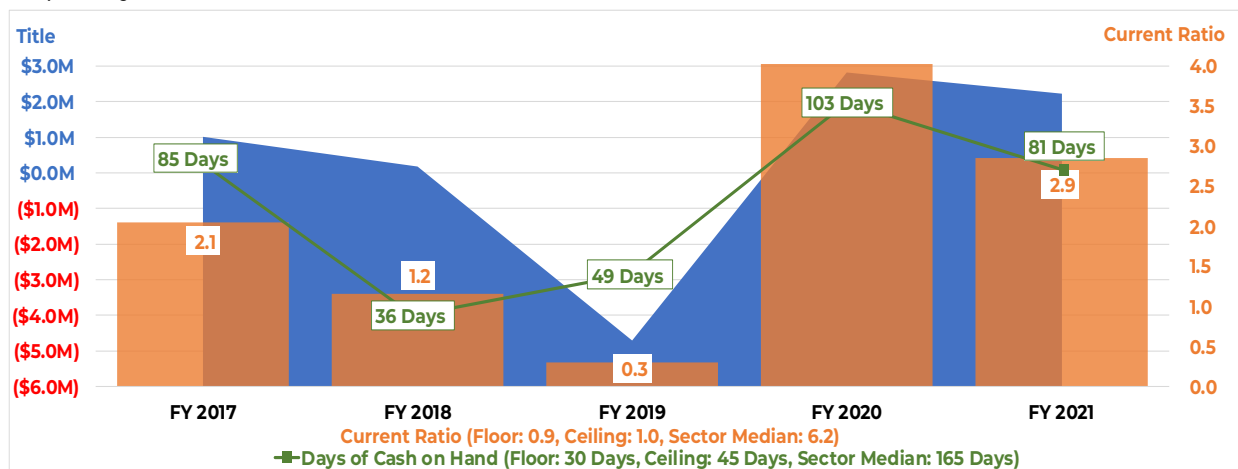
Key Metrics and Comparisons

Enrollment and Operations

As shown in the school's FY 2021 FAR,⁸⁰ in the five-year period from FY 2017 to FY 2021, the school's changes in net assets have been positive, with the only exceptions being FY 2019 and FY 2020, when net assets decreased \$0.1M and \$0.6M, respectively. The significant \$1.9M change in net assets in FY 2021 reflects mainly the \$1.5M income from the Paycheck Protection Plan (PPP) loan forgiveness. The -1% change in net assets margins in FY 2019 and FY 2020, and the -3% change in net assets margin in FY 2017 are not causes for concern, as they were still above the -5% floor. The close-to-target change in net assets margins, ranging between -3% and 7% in the five-year audited period and in FY 2022 (unaudited), reflect the school's investment each year of the received funding to further its operations. In FY 2021, the school efficiently allocated expenses among expense categories by incurring more expenses for salaries and benefits (72% of total operating expenses) and less expenses for occupancy and general expenses (12% and 8% of total operating expenses, respectively) than the respective 63%, 17%, and 11% sector medians. Additionally, in the five-year period from FY 2017 to FY 2021, the school increased its financial strength, evidenced by its 28% increase in net assets, from \$3.7M at FYE 2017 to \$4.7M at FYE 2021. Its primary reserve ratio at FYE 2021 is a healthy 0.4, above the 0.2 target. The school also enrolled at least 98% of its enrollment ceiling each year of the review period.

⁸⁰ See the school's Enrollment, Operations, and Working Capital chart in the first page of the school's FY 2021 FAR Report, Appendix P4.

Liquidity




Days of cash on hand at FYE 2017 through FYE 2021 consistently exceeded the 45-days target, with the only exception of 36 days at FYE 2018. This is not a cause for concern, as this was mainly the result of investments in leasehold improvements for the school's new location that started accepting enrollment in FY 2019. However, the FY 2022 unaudited financial statements show that the school's days of cash on hand dropped to 35 days at FYE 2022 mainly due to higher staffing needs arising from the COVID-19 pandemic and for COVID-19 testing. This is not a cause for concern in the short-term, as the school's unaudited financial statements reflect other positive liquidity indicators (3.9 current ratio and \$2.4M working capital at FYE 2022) and sustainability indicators (0.3 primary reserve ratio at FYE 2022). Additionally, in its FY 2023 budget, the school budgeted an improvement in days of cash on hand at FYE 2023. The current ratio at FYE 2017 through FYE 2021 consistently exceeded the 1.0 target, with the only exception of 0.3 at FYE 2019. This is also not a cause for concern because the FYE 2019 current ratio, when adjusted for the following year balloon payment refinanced in FY 2020, increases to 2.1, above the target. Both these measures subsequently rebounded in response to the cash inflow from the \$1.5M PPP loan provided in FY 2020 and the FY 2020 loan refinancing.

Facilities and Occupancy

The school's expenses for its facilities as a percentage of total DC facilities funding recognized from FY 2017 to FY 2021 ranged between 80% and 89%, remaining below the FY 2021 117% sector median. In July 2008, the school purchased its land and building through a \$7.0M construction note payable, refinanced in FY 2013 and then again in FY 2020 at a more favorable interest rate of LIBOR plus 2.25%. The school also has a lease agreement for the rental of a facility that will expire in June 2023, with options for lease renewals. In FY 2021, the school's occupancy expenses as a percentage of facilities revenues were 80%, or 37% below the sector median. The school's \$27 occupancy expenses per square foot is also below the \$30 sector median. By incurring less occupancy costs than the sector median, more funds are available to invest in educating the students.

Sustainability: Net Assets, Primary Reserve Ratio, and Debt Ratio

Fiscal Year	FY 2017	FY 2018	FY 2019	FY 2020	FY 2021	FY 2021 Target	FY 2021 Sector Median	Multiyear Trend
Net Assets	\$3.7M	\$4.1M	\$4.1M	\$3.5M	\$4.7M	NA	\$6.0M	
Operating Expenses	\$7.4M	\$8.2M	\$11.2M	\$12.2M	\$12.9M	NA	\$10.6M	
Primary Reserve Ratio (Higher is better)	0.5	0.5	0.4	0.3	0.4	≥ 0.2	0.6	
Debt Ratio (Lower is better)	0.7	0.7	0.7	0.7	0.6	≤ 0.5	0.4	

The school shows financial sustainability through its consistently above target primary reserve ratio, ranging between 0.3 and 0.5 between FYE 2017 and FYE 2021. In the same five-year period, the debt ratio has not decreased to the 0.5 target but remains below the 0.9 target maximum, showing a slight decrease from 0.7 in FY 2017 through FY 2020, to 0.6 in FY 2021, mainly due to the forgiveness of the \$1.5M PPP loan. This is not a cause for concern given the adequate liquidity measures at FYE 2021. Additionally, in FY 2018 and FY 2019, the school breached its reporting covenants with the bank, but it received a waiver each year.

Audit Findings

As summarized in the school's FAR Reports, Appendices P1 – P2, the school's independent auditor's reports for FY 2017 to FY 2021 reflected clean opinions, as financial statements presented fairly in all material respects the financial position and results of the school. Additionally, no audit findings on the internal controls over financial reporting were noted in the five-year period from FY 2017 to FY 2021.