

Lea Crusey
Board Chair

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

February 5, 2024

Via Electronic Mail

James Moore
Board Chair

Allison Kokkoros
Executive Director

Carlos Rosario International Public Charter School
3701 Hayes Street NE
Washington, DC 20019

Re: 25-Year Charter Review of Carlos Rosario International Public Charter School

Dear Mr. Moore and Ms. Kokkoros,

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 Carlos Rosario International Public Charter School (Carlos Rosario 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 April 3, 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 Board continue school's charter.

¹ See DC Code § 38-1802.12(a)(3).

² See DC Code § 38-1802.13(a)-(b).



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Executive Director

At its public board meeting on April 24, 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 with a condition, 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,

A handwritten signature in black ink, appearing to read "Lea Crusey".

Lea Crusey
Board Chair

A handwritten signature in black ink, appearing to read "Michelle J. Walker-Davis".

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: Carlos Rosario International Public Charter School**

DATE: **April 24, 2023**

Recommendation

District of Columbia Public Charter School Board (DC PCSB) staff recommends that its Board vote to continue the charter of Carlos Rosario International Public Charter School (Carlos Rosario PCS). This recommendation aligns with DC PCSB's Strategic Roadmap Priority of Excellent Schools.¹

Charter Review Findings

DC PCSB staff conducted a 25-year charter review of Carlos Rosario 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

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 the Strategic Roadmap here: <https://bit.ly/3EVeKYg>.

² D.C. Code §§ 38-1802 *et seq.*

goals); 2) compliance with its charter and applicable federal and local laws; and 3) 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	Carlos Rosario PCS met nine goals and partially met one.				
Compliance	Carlos Rosario PCS did not violate the law or materially violate its charter.				
Finance	Carlos Rosario PCS did not commit fiscal mismanagement.				
Performance Management Framework (PMF) Outcomes					
2017 – 18	2018 – 19	2019 – 20	2020 – 21	2021 – 22	Average
Tier 1 ³	71.4% ⁴	Not Applicable (NA) ⁵			NA

Carlos Rosario PCS has 10 charter goals that measure adult basic education growth, English language acquisition, secondary credential attainment, college and career readiness, school environment, United States naturalization exam passage, and technology test passage. The school met nine goals and partially met its Adult Basic Education (ABE) Skills goal. The table below lists each charter goal.

Charter Goals		Met?
1	Progress: Adult Basic Education (ABE) Skills	Partially met
2	Progress: English Language Acquisition/English as a Second Language (ESL)	Met
3	Achievement: General Educational Development (GED) Passage	Met
4	College and Career Readiness: Industry Certification Passage	Met

³ DC PCSB defines "Tier 1" as "high-performing."

⁴ DC PCSB uses the Adult Education PMF (AE PMF) to evaluate academic performance for adult-serving schools like Carlos Rosario PCS. From SY 2015 – 16 through SY 2017 – 18, adult-serving schools could only earn a PMF Tier. In 2018, DC PCSB adopted a scoring model for adult-serving schools. SY 2018 – 19 was the first year in which adult-serving schools could earn both a PMF Tier and a score. A PMF score of 71.4% is also Tier 1 performance.

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>.

Charter Goals		Met?
5	College and Career Readiness: Enter Workforce or Postsecondary Education	Met
6	College and Career Readiness: Retain Employment or Enter Postsecondary Education	Met
7	Leading Indicator: In-seat Attendance (ISA) Rate	Met
8	Leading Indicator: Retention Rate	Met
9	Mission Specific: Naturalization Exam Passage	Met
10	Mission Specific: Technology Test Passage	Met

To elaborate on the table above, Carlos Rosario PCS did not meet its ABE Skills goal in SY 2017 – 18 but did meet the goal in SY 2018 – 19, leaving the goal partially met overall.

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.⁶ For adult education schools, transitional goals data includes standard data collection, to the extent available, of ABE and ESL growth, secondary credential attainment, GED subject test passage, and high-level CTE certification attainment. See Carlos Rosario PCS's SY 2021 – 22 transitional goals performance on pages 16 through 18 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.⁷

In addition to collecting transitional goals data, DC PCSB staff conducted a Qualitative Site Review (QSR) at Carlos Rosario PCS during SY 2021 – 22. DC PCSB

⁶ See DC PCSB's transitional goals description in the *COVID-19 Impact Policy*, <https://bit.ly/3JCFwIQ>, p. 2.

⁷ See the *COVID-19 Impact Policy*, <https://bit.ly/3JCFwIQ>, p. 6.

uses the QSR to evaluate schools' environment and instructional quality. Like transitional goals data, QSR outcomes provide supplemental evidence of school quality. See Carlos Rosario PCS's SY 2021 – 22 QSR performance on pages 8 and 9 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."⁸ 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.⁹

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.¹⁰

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.¹¹

Background

Carlos Rosario PCS began operation in 1998 under authorization from DC PCSB. The school currently educates 1,975 adult students at one campus located in Ward 1.¹² Per its mission, Carlos Rosario PCS aims to "deliver high-quality education, career training, and supportive services that enable adult immigrants to realize their dreams while strengthening our community and economy."

Notification

On March 9, 2023, DC PCSB staff notified Advisory Neighborhood Commissioner Billy Easley (1A10) of the school's 25-year charter review. DC PCSB staff also posted a

⁸ D.C. Code § 38-1802.12(a)(3).

⁹ D.C. Code § 38-1802.13(a).

¹⁰ DC PCSB may impose conditions of continuance if it deems such conditions appropriate.

¹¹ D.C. Code § 38-1802.13(b).

¹² This enrollment figure is based on preliminary, unvalidated data as of October 5, 2022.

notice for public comment on the charter review in the DC Register and on the DC PCSB website.¹³

Attachment to this Proposal

Attachment A: Carlos Rosario PCS 25-Year Preliminary Charter Review Report

Date: April 24, 2023

DC PCSB Action: X Approved Approved with Changes Rejected

Changes to the Original Proposal:

DC PCS Board Chair Signature:

Glen M. Cussey

¹³ See the notice here: <http://bit.ly/42t2Uln>.



2022 – 23 25-Year Charter Review Report Carlos Rosario International Public Charter School

April 24, 2023

DC Public Charter School Board
3333 14th Street NW, Suite 210
Washington, DC 20010
(202) 328-2660
www.dcpccb.org

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BOARD VOTE AND KEY FINDINGS¹

Carlos Rosario International Public Charter School (Carlos Rosario PCS) ^{2,3}					
Review or Renewal		25-year charter review			
Review Period		School year (SY) 2017 – 18 through SY 2021 – 22			
Charter Goals		Carlos Rosario PCS met nine goals and partially met one.			
Compliance		Carlos Rosario PCS did not violate the law or materially violate its charter.			
Finance		Carlos Rosario PCS did not commit fiscal mismanagement.			
Board Vote		The Board voted 6 – 0 to continue Carlos Rosario PCS’s charter.			
Performance Management Framework (PMF) Outcomes ⁴					
2017 – 18	2018 – 19	2019 – 20	2020 – 21	2021 – 22	Average
Tier 1	71.4% ⁵	Not Applicable (NA) ⁶			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 Carlos Rosario PCS, evaluating the school’s progress toward meeting its goals and academic achievement expectations (charter goals). The school has 10 charter goals that measure Adult Basic Education (ABE) skills, English language acquisition, secondary credential attainment, college and career readiness, school environment, United States naturalization exam passage, and technology test passage. The school met nine goals and partially met its ABE skills goal.

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.

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/3Zt7p7Q>.

³ See Carlos Rosario PCS’s Charter Agreement and Amendments, Appendices A1 – A7.

⁴ See Carlos Rosario PCS’s PMF scorecards, Appendices B1 – B2.

⁵ DC PCSB uses the Adult Education PMF (AE PMF) to evaluate academic performance for adult-serving schools like Carlos Rosario PCS. From SY 2015 – 16 through SY 2017 – 18, adult-serving schools could only earn a PMF Tier. In 2018, DC PCSB adopted a scoring model for adult-serving schools. SY 2018 – 19 was the first year in which adult-serving schools could earn both a PMF Tier and a score. A PMF score of 71.4% is also Tier 1 performance.

⁶ 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>.

⁷ D.C. Code § 38-1802.12(a)(3).

On April 24, 2023, the Board voted 6 – 0 to continue the school'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.

SCHOOL BACKGROUND

Carlos Rosario PCS			
Year Opened	1998 – 99	Ward(s)	1
Number of Campuses	1	Year(s) of Previous Review	2003 – 04, 2008 – 09, 2012 – 13, 2017 – 18
Current Enrollment Ceiling	2,200	Current Enrollment	1,975 ⁸
Chartered Grade Span	Adult	Current Grade Span	Adult
Mission Statement			
[Carlos Rosario PCS] delivers high quality education, career training, and supportive services that enable adult immigrants to realize their dreams while strengthening our community and economy.			

School Overview

Carlos Rosario PCS began operation in 1998 under authorization from DC PCSB to educate students aged 16 and older. A majority of the school's students are recent immigrants who desire to learn English as a second language. To that end, Carlos Rosario PCS offers an English language acquisition program. It also provides instruction in adult basic education and a General Education Development (GED) program, in which students prepare to earn a secondary credential in English or Spanish.⁹ Additionally, the local education agency (LEA)¹⁰ prepares students for the United States naturalization exam. During the review period, Carlos Rosario PCS achieved Tier 1, high-performance PMF rates.

Carlos Rosario PCS students can choose from a variety of career training programs, including learning the fundamentals of culinary arts and information technology or obtaining training to become a certified bilingual teaching assistant or nurse aide. To support student retention, the school assigns students individual case managers to help them keep track of their academic progress. The school also works to ensure students have access to basic needs such as health care insurance, food resources, daycare and school enrollment for their dependents, and public benefits when needed. Additionally, to accommodate the varying needs of its adult students and their lives outside of school, the LEA offers a combination of virtual and in-person classes that occur during day and evening.

⁸ This enrollment data is based on preliminary, unvalidated data as of October 5, 2022.

⁹ Adult basic education services “are designed for adults who need to improve their reading, writing, and basic math skills in order to obtain a high school diploma or GED and/or transition to postsecondary education and/or the workforce,” as quoted in DC’s 2016 “Workforce Innovation and Opportunity Act (WIOA) 2016 – 2020 Unified State Plan,” available here: <http://bit.ly/2oSeZg6>.

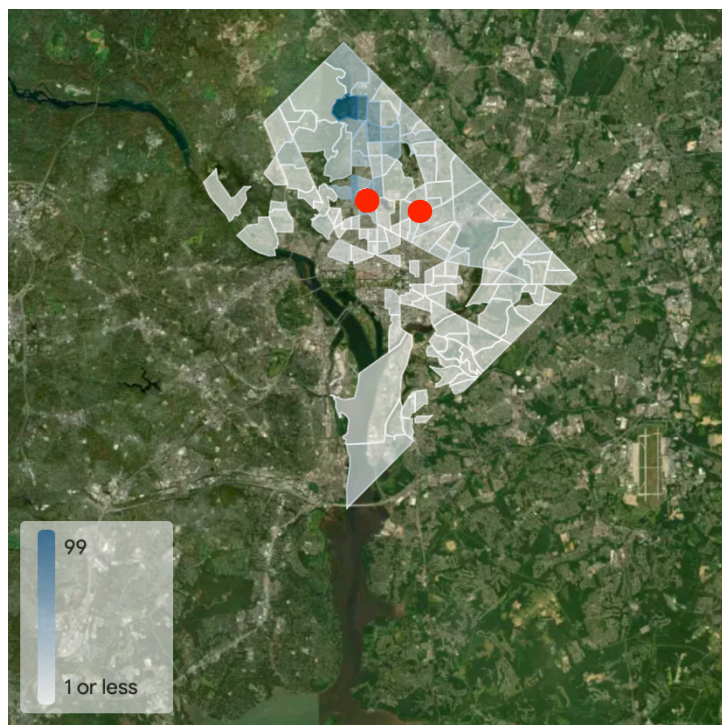
¹⁰ An “LEA” is any individual or group of public charter schools operating under a single charter.

Enrollment and Demographic Data

The table below shows the school's enrollment history during the review period.

School Year	2017 – 18	2018 – 19	2019 – 20	2020 – 21	2021 – 22
Audited Enrollment ¹¹	2,121	2,137	2,120	1,778	1,937
Enrollment Projections ¹²	2,100	2,100	2,100	2,100	1,850
Enrollment Ceiling ¹³	2,200	2,200	2,200	2,200	2,200

The map below shows where SY 2021 – 22 Carlos Rosario PCS students live in relation to the school, which is marked by a red dot.¹⁴ The blue gradient represents the density of students. As the map shows, Carlos Rosario PCS enrolls students from every ward in the District, though most of its students come from Wards 4 and 1.



¹¹ The Office of the State Superintendent of Education (OSSE) conducts an annual enrollment audit to determine the number of students at each public school in the District.

¹² 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.

¹³ 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.

¹⁴ Carlos Rosario PCS is a one campus LEA that operates across two facilities.

The table below shows the LEA's SY 2021 – 22 student demographics.

Student Group	Percentage Enrolled
American Indian or Alaska Native	0.1%
Asian	2.2%
Black or African American	19.8%
Hispanic/Latino	74.3%
Multiracial	— ¹⁵
Native Hawaiian or Other Pacific Islander	—
White	1.9%

School Climate

The charts below report Carlos Rosario PCS's performance across two school environment measures: out-of-school suspension (OSS) rates and in-seat attendance (ISA) rates. These data do not factor into DC PCSB's continuance determination.¹⁶

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 Carlos Rosario PCS's average OSS rates compared to the OSS averages for DC adult education (AE) public charter schools.¹⁷

Key for OSS 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 ¹⁸

Two-Year (SY 2017 – 18 and SY 2018 – 19) Average OSS Rate	
Carlos Rosario PCS	AE Charter Sector
0.0%	0.5%

¹⁵ The “—” symbol indicates the school does not or did not enroll students in the corresponding student group(s).

¹⁶ 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.

¹⁷ For SY 2020 – 21, DC PCSB determined the number of students suspended across the charter sector, including Carlos Rosario PCS, is too small to report.

¹⁸ DC PCSB does not report on values when the n-size is less than 10.

SY 2019 – 20 Average OSS Rate	
Carlos Rosario PCS	AE Charter Sector
0.0%	0.5%

SY 2021 – 22 Average OSS Rate	
Carlos Rosario PCS	AE Charter Sector
0.1%	0.0%

ISA

The ISA rate is the percentage of students who were present each day. The charts below detail Carlos Rosario PCS's data 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 Rate	
Carlos Rosario PCS	AE Charter Sector
71.9%	68.3%

SY 2019 – 20 Average ISA Rate	
Carlos Rosario PCS	AE Charter Sector
75.0%	70.4%

SY 2020 – 21 Average ISA Rate	
Carlos Rosario PCS	AE Charter Sector
68.0%	65.5%

SY 2021 – 22 Average ISA Rate	
Carlos Rosario PCS	AE Charter Sector
67.0%	43.4%

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*.¹⁹ From April 18 – 29, 2022, in anticipation of this review, DC PCSB conducted a QSR at Carlos Rosario PCS.²⁰ In the classroom environment domain, observers noted that interactions between teachers and students were respectful and reflected genuine warmth and care. Additionally, in some observations, teachers showed interest in students' lives outside of school. Across all observations, students indicated a desire to produce high-quality work and asked several questions to ensure complete understanding of academic content. In the instruction domain, observers noted that teachers clearly communicated learning objectives. In some observations, students explained the learning tasks to peers who needed additional support. Teachers also used a mix of open-ended questions designed to promote critical thinking and engagement. Throughout all observations, all students engaged in academically rigorous content.

After conducting unannounced observations,²¹ the QSR team rated the classroom environment and instruction as “unsatisfactory,” “basic,” “proficient,” or “distinguished.” The following chart details the percentage of Carlos Rosario 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 that received proficient and distinguished ratings in each domain.

School/Sector	Classroom Environment	Instruction
Carlos Rosario PCS	100%	86.0%
Average score for AE public charter schools	99.0%	89.0%

Carlos Rosario PCS scored above the average in the classroom environment domain and below the average in the instruction domain compared to other AE public charter schools that received a QSR during SY 2021 – 22.

Previous Charter Reviews

Five-Year Review

In SY 2003 – 04,²² DC PCSB conducted a five-year charter review of Carlos Rosario PCS and found the school met the standard for conditional charter continuance. DC PCSB

¹⁹ Danielson, Charlotte. *The Framework for Teaching: Evaluation Instrument*. Princeton, NJ: Danielson Group, 2013.

²⁰ See Carlos Rosario PCS's SY 2021 – 22 QSR Report, Appendix C.

²¹ 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.

²² See Carlos Rosario PCS's Five-Year Review Report, Appendix D.

determined the school met all academic targets. The school met one out of three nonacademic targets. In February 2004, DC PCSB voted to continue the school's charter with the conditions listed below.²³

- Develop one or more assessments to measure the acquired life skills resulting from activities, such as life skills workshops, by September 1, 2004. Report outcome data from the new life skills assessment(s) to the PCSB by December 1, 2004.
- Provide documentation of the school's placement and promotion procedures that demonstrates an alignment between the placement/promotion standards Comprehensive Adult Student Assessment Systems standards (CASAS), and the curriculum.

10-Year Review

In SY 2008 – 09,²⁴ DC PCSB conducted a 10-year charter review of Carlos Rosario PCS and found the school fully met all its academic and nonacademic goals. The report highlights the school's governing board and its consistency with adhering to compliance measures.²⁵ In January 2009, DC PCSB voted to continue the school's charter.

15-Year Renewal

In SY 2012 – 13,²⁶ DC PCSB conducted a 15-year renewal of Carlos Rosario PCS and found the school met the standard for renewal. DC PCSB determined that the school met all six of its charter goals. In January 2013, DC PCSB voted to renew Carlos Rosario PCS's charter for another 15-year term.

20-Year Review

In SY 2017 – 18,²⁷ DC PCSB conducted a 20-year review of Carlos Rosario PCS and found the school met the standard for continuance. DC PCSB determined that Carlos Rosario PCS met all seven of its charter goals. In March 2018, DC PCSB voted to continue the school's charter.

Communication with the School

In July 2022, DC PCSB staff met with members of Carlos Rosario PCS's 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.

²³ See Carlos Rosario PCS's Conditional Continuance Letter, Appendix E.

²⁴ See Carlos Rosario PCS's 10-Year Review Report, Appendix F.

²⁵ Ibid., p. 2.

²⁶ See Carlos Rosario PCS's 15-Year Renewal Report, Appendix G.

²⁷ See Carlos Rosario PCS's 20-Year Review Report, Appendix H.

CHARTER REVIEW STANDARD

The SRA stipulates that DC PCSB "shall review [a school's] charter at least once every [five] years."²⁸ 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.²⁹

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.³⁰

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.³¹

²⁸ D.C. Code § 38-1802.12(a)(3).

²⁹ D.C. Code § 38-1802.13(a).

³⁰ DC PCSB may impose conditions of continuance if it deems such conditions appropriate.

³¹ 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 February 2018,³² Carlos Rosario PCS amended its charter renewal agreement, setting specific targets for its goals and academic achievement expectations. The chart below reports whether Carlos Rosario PCS met its charter goals. The text for each goal, along with DC PCSB's corresponding determination, follows the chart. This section ends with contextual information from the school regarding its experience during the COVID-19 pandemic in SY 2020 – 21.³³

Charter Goals		Met?
1	Progress: Adult Basic Education (ABE) Skills	Partially met
2	Progress: English Language Acquisition/English as a Second Language (ESL)	Met
3	Achievement: GED Passage	Met
4	College and Career Readiness: Industry Certification Passage	Met
5	College and Career Readiness: Enter Workforce or Postsecondary Education	Met
6	College and Career Readiness: Retain Employment or Enter Postsecondary Education	Met
7	Leading Indicator: ISA Rate	Met
8	Leading Indicator: Retention Rate	Met
9	Mission Specific: Naturalization Exam Passage	Met
10	Mission Specific: Technology Test Passage	Met

³² See Carlos Rosario PCS's Goals and Academic Achievement Expectations Amendment, Appendix A6.

³³ Per the *COVID-19 Impact Policy*, DC PCSB will include relevant written narrative and context from the school when SY 2020 – 21 goal data is publicly reported. See the *COVID-19 Impact Policy* here: <https://bit.ly/2FbYLMw>.

Key for Goals Charts	
Green	Equal to or greater than the target
Red	Less than the target
Blue	Data not available (NA) or data not used for goal determination ³⁴
n < 10	The number of test takers (n-size) is less than 10

1. **Progress: ABE Skills**³⁵

By the end of the program year, the annual weighted average of students making a) one or more National Reporting System (NRS) – Educational Functioning Level (EFL) gains on the Test of Adult Basic Education (TABE) for English GED program students and b) gaining one or more grade level on Spark 3000 for Spanish GED program students will meet or exceed 60.0%.

The chart below shows the school's performance on this goal.

Progress: Adult Basic Education Skills										
	2017 – 18		2018 – 19		2019 – 20		2020 – 21		2021 – 22	
	School	Target	School	Target	School	Target	School	Target	School	Target
Rate	50.0%	60.0%	72.1%	60.0%	NA		43.8%	60.0%	68.2%	60.0%
n-size	160		147				185		132	

Determination: Carlos Rosario PCS partially met this goal.

It is important to note the school met the target in SY 2021 – 22.

2. **Progress: ESL**

70.0% of pre- and post-testing English language learners will make one or more NRS - EFL gains by the end of the program year.

The chart below shows the school's performance on this goal.

³⁴ Per the *COVID-19 Impact Policy*, schools will be assessed on goal attainment using data prior to the COVID-19 pandemic. DC PCSB ceased collection, aggregation, and publication of SY 2019 – 20 academic data. Furthermore, DC PCSB reports SY 2020 – 21 and SY 2021 – 22 data as it pertains to goals, but it does not assess whether the school met its targets in those years. For details, see the *COVID-19 Impact Policy* here: <https://bit.ly/3fy5zDo>.

³⁵ The AE PMF measures EFL gains “based on the subject on which each student had the lowest pre-test” for student progress measures. For details, see the *2019 – 20 PMF Policy & Technical Guide* here: <https://bit.ly/2D2lvqc>.

Progress: ESL										
	2017 – 18		2018 – 19		2019 – 20		2020 – 21		2021 – 22	
	School	Target	School	Target	School	Target	School	Target	School	Target
Rate	74.2%	70.0%	73.4%	70.0%	NA		63.1%	70.0%	63.5%	70.0%
n-size	1,757		1,742				241		1,207	

Determination: Carlos Rosario PCS met this goal.

3. Achievement: GED Passage

65.0% of GED test-takers will pass the official GED exam by the end of the program year.

The chart below shows the school's performance on this goal.

Achievement										
	2017 – 18		2018 – 19		2019 – 20		2020 – 21 ³⁶		2021 – 22	
	School	Target	School	Target	School	Target	School	Target	School	Target
Rate	80.6%	65.0%	74.2%	65.0%	NA				64.7%	65.0%
n-size	31		31						17	

Determination: Carlos Rosario PCS met this goal.

4. College and Career Readiness: Industry Certification Passage

70.0% of students will pass industry certification tests.

The chart below shows the school's performance on this goal.

College and Career Readiness: Industry Certification Tests										
	2017 – 18		2018 – 19		2019 – 20		2020 – 21		2021 – 22	
	School	Target	School	Target	School	Target	School	Target	School	Target
Rate	96.9%	70.0%	100%	70.0%	NA		11.9%	70.0%	94.5%	70.0%
n-size	96		85				42		55	

Determination: Carlos Rosario PCS met this goal.

5. College and Career Readiness: Enter Workforce or Postsecondary

49.0% of exiting students will enter the workforce or enter post-secondary education.

The chart below shows the school's performance on this goal.

³⁶ DC PCSB collected data from schools in SY 2020 – 21 in accordance with their charter goals, but schools were not penalized for failure to report on goals data that was unavailable or impractical due to public health conditions.

College and Career Readiness: Enter Workforce or Postsecondary										
	2017 – 18		2018 – 19		2019 – 20		2020 – 21		2021 – 22 ³⁷	
	School	Target	School	Target	School	Target	School	Target	School	Target
Rate	76.0%	49.0%	79.4%	49.0%	NA					
n-size	100		126							

Determination: Carlos Rosario PCS met this goal.

6. College and Career Readiness: Retain Employment or Enter Postsecondary

59.0% of exiting students retain employment or enter post-secondary education.

The chart below shows the school's performance on this goal.

College and Career Readiness: Retain Employment or Enter Postsecondary										
	2017 – 18		2018 – 19		2019 – 20		2020 – 21		2021 – 22 ³⁸	
	School	Target	School	Target	School	Target	School	Target	School	Target
Rate	93.2%	59.0%	96.3%	59.0%	NA					
n-size	739		669							

Determination: Carlos Rosario PCS met this goal.

7. Leading Indicator: ISA

69.0% ISA.

The chart below shows the school's performance on this goal.

Leading Indicator: ISA										
	2017 – 18		2018 – 19		2019 – 20		2020 – 21		2021 – 22	
	School	Target	School	Target	School	Target	School	Target	School	Target
Rate	72.5%	69.0%	71.3%	69.0%	NA		68.8%	69.0%	67.0%	69.0%

Determination: Carlos Rosario PCS met this goal.

8. Leading Indicator: Retention Rate

60.0% retention rate.

The chart below shows the school's performance on this goal.

³⁷ Per the COVID-19 Impact Policy, DC PCSB did not require AE schools to submit SY 2021 – 22 college and career readiness data.

³⁸ Ibid.

Leading Indicator: Retention Rate										
	2017 – 18		2018 – 19		2019 – 20		2020 – 21		2021 – 22	
	School	Target	School	Target	School	Target	School	Target	School	Target
Rate	78.6%	60.0%	83.1%	60.0%	NA				36.2%	60.0%
n-size	3,003		2,941						2,563	

Determination: Carlos Rosario PCS met this goal.

9. **Mission Specific: Naturalization Exam**

85.0% of Citizenship students will pass the naturalization exam.

The chart below shows the school's performance on this goal.

Mission Specific: Naturalization Exam										
	2017 – 18		2018 – 19		2019 – 20		2020 – 21		2021 – 22	
	School	Target	School	Target	School	Target	School	Target	School	Target
Rate	100%	85.0%	100%	85.0%	NA				100%	85.0%
n-size	10		12						47	

Determination: Carlos Rosario PCS met this goal.

10. **Mission Specific: Technology Test**

75.0% of ESL students will pass the CR Technology Test.

The chart below shows the school's performance on this goal.

Mission Specific: Technology Test										
	2017 – 18		2018 – 19		2019 – 20		2020 – 21		2021 – 22	
	School	Target	School	Target	School	Target	School	Target	School	Target
Rate	88.1%	75.0%	89.5%	75.0%	NA				80.7%	75.0%
n-size	1,643		1,617						796	

Determination: Carlos Rosario PCS met this goal.

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.³⁹ For AE schools, transitional goals include standard data collection, to the extent available, of ABE Educational Gain and/or ESL Educational Gain, Earned Secondary Credential, GED Subject

³⁹ See DC PCSB's transitional goals description in the *COVID-19 Impact Policy*, <https://bit.ly/3JCFwlQ>, p. 2.

Test Achievement, Earned High-Level Certification, ISA, and Persistence.⁴⁰ The charts below show the school's overall and student group performance on each transitional goals measure.

Educational Functioning Level (EFL) Growth on TABE by Student Group

Student Group	2021 – 22 ABE Educational Gain Rates	
	n-size	Rate
All Students	59	57.6%
Black or African American	31	58.1%
Hispanic/Latino	22	59.1%
White	n < 10	
Other Races	n < 10	
Female	38	55.3%
Male	20	60.0%

Educational Functioning Level (EFL) Growth on CASAS by Student Group

Student Group	2021 – 22 ESL Educational Gain Rates	
	n-size	Rate
All Students	880	53.1%
Black or African American	164	47.6%
Hispanic/Latino	677	53.6%
White	18	61.1%
Other Races	18	72.2%
Female	604	51.5%
Male	271	56.8%

Earned Secondary Credential by Student Group

Student Group	2021 – 22 Secondary Credential Attainment Rates	
	n-size	Rate
All Students	17	64.7%
Black or African American	n < 10	
Hispanic/Latino	n < 10	
Other Races	n < 10	
Female	13	61.5%
Male	n < 10	

⁴⁰ In this context, persistence captures the percentage of students who stay at an adult education program long enough to make academic and career gains.

GED Subject Test Achievement by Student Group

Student Group	2021 – 22 GED Subject Test Achievement Rates	
	n-size	Rate
All Students	56	83.9%
Black or African American	n < 10	
Hispanic/Latino	50	92.0%
Other Races	n < 10	
Female	38	81.6%
Male	18	88.9%

Earned High-Level Certification by Student Group

Student Group	2021 – 22 Earned High-Level Certification Rates	
	n-size	Rate
All Students	25	100%
Black or African American	11	100%
Hispanic/Latino	n < 10	
White	n < 10	
Other Races	n < 10	
Female	20	100%
Male	n < 10	

ISA

2021 – 22 ISA Rate
67.0%

Persistence

2021 – 22 Persistence Rate
36.2%

Additional Context

In Spring 2021,⁴¹ in accordance with the *COVID-19 Impact Policy*, DC PCSB asked schools with mission-specific charter goals to respond to two prompts to better understand the impact of the COVID-19 pandemic on SY 2020 – 21 and schools' responses. See DC PCSB's prompts and Carlos Rosario PCS's responses below.

Question 1: Briefly describe how you adjusted programming to meet the needs of your students.

⁴¹ Per the *COVID-19 Impact Policy*, DC PCSB will include relevant written narrative and context from the school when SY 2020 – 21 goal data is publicly reported.

Carlos Rosario PCS reported the following:

We pivoted our class structure and all content to be accessible online, both viewable on mobile and laptop devices. Classes were infused with technology supports, social-emotional supports as well as a high resource bank to meet the needs of our community. We transformed what school looks like to successfully deliver our mission for our adult learners at a time of hyper change and uncertainty. We honored our learner's goals and recognized their needs for increased support to access jobs and health resources for themselves and their families.

We administered pre and post-tests for CASAS online when it was feasible and in-person when safe. This practice resulted in only a portion of our ESL students having a matching pre and post-test during the SY 20/21 timeframe. We are also “push[ing] forward” scores on the CASAS test to serve as a pre-test. Scores were pushed for current students who have a CASAS score within the last fifteen months to serve as the pre-test. We centered our focus on student wellness, safety, and access to distance learning by prioritizing class time and supports for students to learn the new tools, navigate effectively, and learn at a distance in a second language while building digital literacy.

Question 2: Briefly describe the biggest challenges your school faced this school year.

Carlos Rosario PCS reported the following:

Student job loss.

Student health needs.

Students learning to use laptops for the first time. Deployment of over 2,000 devices and multilingual, appropriate service to students who are using these devices, provided around the student's availability (tech support accessible from 8 am to 9 pm, Monday to Thursday).

Remote testing a challenge, massive drain on time.

Family demands on students (children home from school, changes in work schedule, etc.).

Students navigating a pandemic, job loss and uncertainty about futures all at once, coupled with fear over health.

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."⁴² The SRA contains a non-exhaustive list of applicable laws, which DC PCSB monitors in its annual compliance reviews. Since SY 2017 – 18, Carlos Rosario PCS has been compliant with all applicable laws as captured in DC PCSB's compliance reviews.⁴³

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 the 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.

In fiscal year (FY) 2017, the school properly submitted 21 procurement contract packages, and in FY 2018, it properly submitted 18 procurement contract packages.

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*,⁴⁴ which tracks the timeliness of procurement contract submissions. Schools, in turn, were expected to adjust their internal processes over time to ensure higher levels of compliance with these procurement contract reporting requirements.

During FY 2019, the school reported 25 procurement contract packages; however, the school received three Early Warning Notices for failure to report contracts in a timely

⁴² D.C. Code § 38-1802.12(a)(3).

⁴³ Every winter, DC PCSB produces a Compliance Review Report for each public charter school in its portfolio. The report summarizes a school's year-to-date compliance status; it does not include a conclusive compliance determination. See DC PCSB's Compliance Review Reports here: <https://bit.ly/3ESLUfl>. See Carlos Rosario PCS's Compliance Review Reports, Appendices II – I5.

⁴⁴ See the *Procurement Contract Submission and Conflict of Interest Policy* here: <https://bit.ly/2QkQign>.

manner. After communication between DC PCSB and the school, Carlos Rosario PCS, properly submitted all relevant documentation. In FY 2021, the school properly reported 20 procurement contract packages, but received one Early Warning Notice for failure to report contracts in a timely manner.

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

Special Education Compliance

AE public charter schools are required to comply with all laws regarding students with disabilities, including the Individuals with Disabilities Education Act (IDEA),⁴⁵ Section 504 of the Rehabilitation Act of 1973,⁴⁶ and the Americans with Disabilities Act of 1990.⁴⁷ However, an AE program may choose whether to “opt-in” or “opt-out” of accepting IDEA funding and thus providing special education services to adult students (ages 18 through 22) with qualifying disabilities under IDEA. Since its first year of operation in SY 1998 – 99, Carlos Rosario PCS has declined IDEA funds; therefore, OSSE does not hold the school accountable to IDEA's monitoring and compliance requirements.

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

⁴⁶ 29 U.S.C. § 794.

⁴⁷ 42 U.S.C. § 12101 *et seq.*

SECTION THREE: FISCAL MANAGEMENT AND ECONOMIC VIABILITY⁴⁸

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.⁴⁹

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 Carlos Rosario PCS for FY 2017 through FY 2021.⁵⁰

Summary of Findings⁵¹

The school 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 in the five-year period between FY 2017 and FY 2021 were above target, indicating strong financial performance, robust liquidity, and healthy sustainability.
- The school increased enrollment each year from FY 2017 to FY 2019 but decreased enrollment in FY 2020 and FY 2021 when adult enrollment declined in response to the pandemic.
- Community Capital Corporation (CCC) is a nonprofit support organization for the school. CCC holds the lease agreements for its two facilities. The school and CCC consolidate their audited financial statements.

⁴⁸ Each percentage in Section Three of this report has been rounded to the nearest whole percentage.

⁴⁹ See D.C. Code § 38-1802.13(b).

⁵⁰ See Carlos Rosario PCS's FAR Reports, Appendices J1 – J5.

⁵¹ See Financial Definitions and Examples, Appendix K.

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

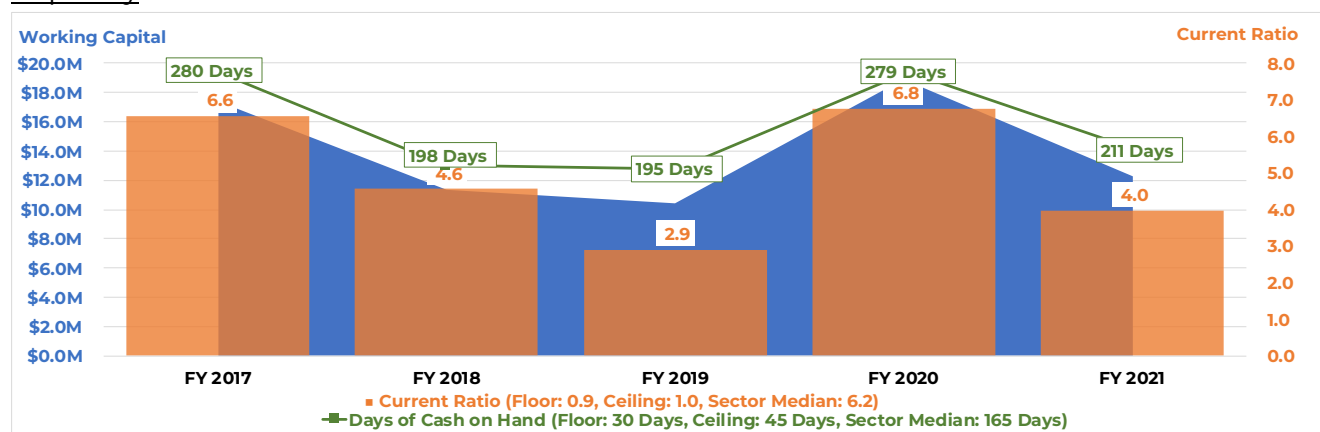
Definitions and examples for each key performance indicator used herein are provided in Appendix K.

Key Metrics and Comparisons

Enrollment and Operations

As shown in the school's Enrollment, Operations, and Working Capital chart in the FY 2021 FAR,⁵² in the five-year period from FY 2017 through FY 2021, the school's changes in net assets have been positive each year, reflecting robust financial health. Additionally, in the five-year period from FY 2017 through FY 2021, the school increased its financial strength, as evidenced by its 45% increase in net assets from \$27.7M at Fiscal-year End (FYE) 2017 to \$40.2M at FYE 2021. Its primary reserve ratio at FYE 2021 is a healthy 1.4, significantly above the 0.2 target. The school also enrolled above 97% of its enrollment ceiling each year from FY 2017 to FY 2020, dipping to 81% in FY 2021 mainly because of the pandemic's impact on adult enrollment. Enrollment continued increasing in FY 2022 and FY 2023.

Liquidity



The school demonstrated robust liquidity throughout the five-year review period. Days of cash on hand at FYE 2017 through FYE 2021 consistently exceeded the 45-days target and the FYE 2021 165-days sector median. The current ratio at FYE 2017 through FYE 2021 also



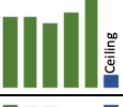

⁵² See the school's Enrollment, Operations, and Working Capital chart in the first page of the school's FY 2021 FAR Report, Appendix J5.

consistently exceeded the 1.0 target. The cash flow from operations margin averaged 13% in the five-year period FY 2017 through FY 2021, reflecting the school's ability to generate cash flow from its operations.

Facilities and Occupancy

In FY 2021, the school's expenses for its facilities as a percentage of total DC facilities funding was 63%,⁵³ significantly below the FY 2021 117% sector median, affording the school the opportunity to deploy more of its funds to educational programming. The school also spent 16% of its total operating expenses on occupancy expenses, slightly below the 17% FY 2021 sector median, while the school's \$37 occupancy expenses per square foot is above the \$30 FY 2021 sector median. The school leases two facilities through CCC, with lease expirations in July 2031 and October 2037. CCC purchased the land for the V Street NW property and holds the lease agreements for the Harvard Street NW and V Street NW properties. CCC also subleased part of the space at V Street NW, which was early terminated in June 2021. CCC has leased to additional tenants in the past and is currently in negotiations to sublease available space which is not currently needed for school operations.

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	\$27.7M	\$28.9M	\$29.3M	\$34.4M	\$40.2M	NA	\$6.0M	
Operating Expenses	\$25.9M	\$27.6M	\$30.1M	\$30.5M	\$28.5M	NA	\$10.6M	
Primary Reserve Ratio (Higher is better)	1.1	1.0	1.0	1.1	1.4	>= 0.2	0.6	
Debt Ratio (Lower is better)	0.5	0.5	0.5	0.3	0.3	<= 0.5	0.4	

The school showed financial sustainability through its consistently above-target primary reserve ratio ranging from 1.0 to 1.4 during FYE 2017 through FYE 2021. In the same five-year period, the debt ratio gradually decreased from 0.5 at FY 2017 to 0.3 at FY 2021, showing that the school is well leveraged and does not significantly rely on borrowed funds.

⁵³ The FY 2021 occupancy expenses in this paragraph reflect a reclassification of certain occupancy expenses from salaries and general expenses as previously reported in the school's [FY 2021 audited consolidated financial statements](#). The school's rent expense to CCC is greater than the amount of its consolidated occupancy expenses, and the difference is therefore eliminated in consolidation as reported in the elimination column of Program service – rental income on page 25 of these statements.

Audit Findings

The school's independent auditor's reports for FY 2017 through FY 2021 reflected clean opinions, as financial statements presented fairly in all material respects the financial position and results of the school. Additionally, only one audit finding was noted in the five-year period from FY 2017 through FY 2021. The auditor found a significant deficiency in FY 2019 concerning the accounting for teacher salary accrual. The school implemented a corrective action plan. The auditor has not issued this finding in subsequent reviews.