

POLICY TITLE	School Expansion Policy
ADOPTION/EFFECTIVE DATE	October 31, 2010
MOST RECENTLY UPDATED	June 29, 2026 June 25, 2018 March 23, 2015 July 3, 2012

PURPOSE

The DC Public Charter School Board (DC PCSB) strives to ensure every DC student receives a quality education. As population forecasts for school-age children decline and city conditions change,¹ DC PCSB must create the policies for responsible charter sector planning. This policy for school expansion aims to increase student access to high-performing schools while promoting sustainable growth in the sector.

Pursuant to the School Reform Act, a local education agency (LEA) must submit a petition to revise its charter. This policy explains the process by which DC PCSB will review charter amendment petitions pertaining to enrollment ceiling increases (ECI), grades served, and replications.

School expansions are difficult to execute effectively and have citywide impact. Accordingly, this policy establishes a high bar for approving expansion requests, thereby limiting growth opportunities to schools demonstrating capacity to successfully implement the plan *and* sustain positive outcomes for students.

A. Connections to Other DC PCSB Policies

DC PCSB seeks to establish consistent and transparent practices for approving, monitoring, and evaluating schools. As such, the *School Expansion Policy* connects to several other policies and guidance. First, the *ASPIRE Policy & Technical Guide* (*ASPIRE Tech Guide*) states that DC PCSB will award high-performing schools with eligibility to replicate or expand their programs.² Schools that earn a Level 1 on ASPIRE are generally eligible to grow, whereas schools that earn a Level 2 may be

¹ See the DC Office of Planning's population forecasts here: <http://bit.ly/45qGGXc>.

² See the *ASPIRE Tech Guide* here: <https://bit.ly/3SuF6wQ>. DC PCSB will adhere to this policy and its successors.

eligible. Regardless of level determination, all schools must apply for an expansion and will be evaluated under this policy.

Further, the expansion application deadline aligns with the *Charter Agreement Amendment Petition Submission Policy*.³ Also, the term “replication” incorporates language from the *Definition of School, Campus, and Facility Policy*.⁴

Finally, the *School Expansion Policy*, the *School Reorganization Policy*,⁵ and the Charter Application Guidelines comprise DC PCSB’s suite of sector planning policies and guidance.⁶ These items interconnect to provide the framework for responsible sector growth and consolidation. They share elements like guiding principles, a multi-stage review process, and a Standard for Approval.

B. Definitions

An **ECI** amendment increases the number of students an LEA may receive funding for through the Uniform Per Student Funding Formula (UPSFF) as established in the maximum enrollment schedule in its charter agreement.

An amendment to the **grades served** changes the grades an LEA may provide instruction to in accordance with the maximum enrollment schedule in its charter agreement.

A **replication** amendment seeks to operate an additional campus within an LEA by replicating an existing campus. Per DC PCSB’s *Definition of School, Campus, and Facility Policy*, a campus “operates a distinct grade range with a single school leader responsible for the academic program for the entire grade span of the campus.”⁷ Each campus has its own goals and academic achievement expectations (charter goals). Further, each campus receives its own accountability report.⁸

C. Guiding Principles

DC PCSB will use the following guiding principles to drive its evaluation of petitions for ECI, grade expansions, replications, mergers, acquisitions, and new schools.

³ See DC PCSB’s *Charter Agreement Amendment Petition Submission Policy* here: <https://bit.ly/3MnSDRz>.

⁴ See DC PCSB’s *Definition of School, Campus, and Facility Policy* here: <https://bit.ly/3rUbWaQ>.

⁵ See the *School Reorganization Policy* here: <https://bit.ly/3Sg2Z1z>.

⁶ See the Charter Application Guidelines here: bit.ly/4ay0ffJ.

⁷ See footnote 4.

⁸ DC PCSB will amend the standard for review for determining charter goal attainment in the expanded LEA’s charter. Following the first year of operation, DC PCSB will evaluate expanded campuses using the relevant ASPIRE framework(s); new campuses will receive a score but no level. DC PCSB will adhere to the *ASPIRE Tech Guide*, the *Charter Goals Policy*, and their successor policies. See the *Charter Goals Policy* here: <https://bit.ly/3QyPovc>.

- **Driving toward excellence.** LEAs must demonstrate a path toward excellence across a comprehensive evaluation of academics, finance, and organizational effectiveness.
- **Need and demand.** LEAs must justify why a campus or program is needed and in demand, contributing to a diverse range of high-quality options.⁹
- **Organizational capacity.** LEA and campus leadership must be strong and stable. A school's governing board must demonstrate the capacity to execute the request with fidelity.¹⁰

POLICY

The following section describes the minimum eligibility criteria and evaluation process for LEAs seeking to expand. This process comprises a notice of exploration, letter of intent, written application, public hearing, vote, and planning year. DC PCSB may hold a capacity interview with an LEA prior to the public hearing to ask questions about the application and assess its leadership capacities to operate the proposed expansion.¹¹

A. Minimum Eligibility Criteria

An LEA must meet each of the following criteria to be eligible for expansion.

1. **Performance:** The LEA must meet performance criteria based on the applicable DC PCSB academic accountability system for at least two of the immediately preceding three school years.¹² For multi-campus LEAs, at least

⁹ In alignment with the National Association for Charter School Authorizers (NACSA), DC PCSB defines need as “students’ access to quality schools, including unique/relevant models, strong outcomes, and other programmatic elements a community may seek.” Demand is “the intention of a sufficient number of students to enroll so that the school will meet its enrollment targets.” See NACSA’s definitions on page 9 here: <https://bit.ly/4aiPf6k>.

¹⁰ NACSA defines leadership capacities as the “knowledge, skills, abilities, and behaviors a team needs in order to develop and operate a quality school.” NACSA explains how an authorizer can gather and evaluate evidence of these capacities here: <https://bit.ly/4hg5S4j>. DC PCSB may use this guidance or its successors to review expansion proposals.

¹¹ In a capacity interview, DC PCSB staff and Board members will pose a series of questions to the school(s) over a 90-minute period. There may be a challenge scenario in which the team must respond to a relevant issue impacting operations. Schools are encouraged to bring staff and board members with the collective expertise to represent the proposed plan. See page 7 for reasons why DC PCSB may hold a capacity interview.

¹² In the event that DC PCSB does not calculate ASPIRE levels or scores, DC PCSB will evaluate performance data for each measure against state, sector, or publisher rates, where applicable. DC PCSB will publish guidance in these instances. Also, DC PCSB will adhere to any successor accountability system.

two-thirds of campuses must meet the relevant performance standard.¹³ For single-campus LEAs evaluated under multiple academic accountability frameworks, at least two-thirds of applicable framework results must meet the performance standard.

- a. LEAs evaluated using the Pre-kindergarten (PK)-Only, PK–8, High School, or Adult Education ASPIRE framework must demonstrate exemplary or strong performance by earning a Level 1 or 2 designation.
 - b. LEAs evaluated using the Alternative Accountability Framework (AAF) must fully meet their charter goals.
2. **Finance:** The LEA must not currently be under a Financial Corrective Action Plan (FCAP) or be on the financial monitoring list.¹⁴ The LEA must meet key financial indicator (KFI) expectations for at least two of the three most recent school years.¹⁵
3. **Charter Review:** The LEA must have received its most recent charter review or renewal without high-stakes conditions for continuance or being placed on probation.¹⁶
4. **Conservative Growth:** The planned expansion adds no more than three grade levels and 175 students per year.¹⁷

B. Notice of Exploration

An LEA seeking an expansion may submit an optional notice of exploration to DC PCSB to indicate initial interest, facilitate early discussions, and support planning. Submission does not constitute a formal application or commitment.

C. Letter of Intent

If an LEA meets the minimum eligibility criteria to pursue an expansion, then it must submit a letter of intent no later than **February 1** of the school year before the

¹³ In its calculations, DC PCSB will exclude campuses without at least two years of data to meet the relevant performance standard. For LEAs evaluated using the ASPIRE framework, all included campuses must have two years of level designations. DC PCSB will consider the holistic performance of the LEA, including data from these excluded campuses, in its final evaluation of an expansion request.

¹⁴ The financial monitoring list and FCAPs are escalating interventions DC PCSB may take if an LEA shows signs of financial instability. Learn more at <https://bit.ly/4vZZip2>.

¹⁵ Prior to the adoption of a school finance policy, DC PCSB will primarily focus its evaluation on whether the LEA met the targets for the KFIs days of cash on hand, current ratio, and primary reserve ratio in that year's *Financial Analysis Report (FAR) Technical Guide*, found here: <https://bit.ly/3QjkWVU>. DC PCSB will establish revised KFI expectations in the school finance policy. DC PCSB will adhere to this policy and its successors to evaluate financial health.

¹⁶ High-stakes conditions are defined as conditions that, if not met, would result in LEA charter revocation, non-renewal, or campus closure.

¹⁷ DC PCSB will waive this criterion for mergers and acquisitions.

proposed expansion's planning year.¹⁸ A letter of intent must be signed by the LEA's leader and board chair and include at least:

- A description of the expansion type (i.e., ECI, grades served, replication) and the growth trajectory.
- A clear rationale for why the LEA is pursuing an expansion and how it will maintain or strengthen student outcomes.
- Evidence of how the expansion is responsive to the need and demand demonstrated by sector planning data and a market analysis.
- An attestation that the LEA meets the minimum criteria for an expansion.
- Evidence that the LEA has sufficient capacity, including financial and organizational capacity, to successfully execute an expansion.

DC PCSB staff will confirm that the LEA meets the minimum eligibility criteria and review the letter. In consultation with a subcommittee of the Board, staff will determine one of two outcomes within three weeks of receiving the letter:

1. **No Objections to Proceeding:** The LEA may proceed with developing the relevant expansion application for approval. DC PCSB reserves the discretion to evaluate whether the rationale is sufficiently compelling, supported by market analysis, and informed by real-time sector and citywide circumstances. As part of this assessment, DC PCSB may identify areas of concern or questions that must be addressed in the final submission. DC PCSB's written response to the LEA will include these considerations. "No Objections to Proceeding" does not indicate that an expansion request will ultimately be approved.
2. **Objections to Proceeding:** After reviewing the letter of intent and the LEA's past performance, DC PCSB finds that the expansion request is unlikely to meet the Standard for Approval. DC PCSB does not recommend that the LEA proceed with developing the relevant expansion application at this time. Any future request should address DC PCSB's objections.

¹⁸ For example, if an LEA submits a letter of intent by February 1, 2027, then, if approved, it will be effective no earlier than school year (SY) 2028–29. For SY 2026–27, DC PCSB will not require a letter of intent prior to application submission.

D. Standard for Approval

Should an LEA proceed with a formal application, then DC PCSB will evaluate the request against the following Standard for Approval. To be considered for approval, the LEA must meet, at a minimum, the standard “Need and Demand.”

1. **Need and Demand:** The LEA’s proposed expansion responds to community need for its relevant model and strong student outcomes. The LEA will likely meet its enrollment targets. To inform this case for demand, the LEA addresses DC PCSB’s most recent demand analysis and provides concrete evidence from interested families or adult students. Based on the expansion request, data may include, but are not limited to, enrollment trends, re-enrollment or persistence rates, population forecasts, intent-to-enroll forms, and objective market research. For ECI requests, DC PCSB will consider the proximity between audited enrollment and the existing ceiling in its decision-making. In the context of all sector-planning related requests, staff determines that the city can sustain the expanded school.
2. **Sufficient Progress in Developing the Plan:** The LEA demonstrates sufficient progress in planning for a high-quality expansion. It has engaged families, adult students (if applicable), staff, community members, and elected officials in the planning process. The LEA realistically assesses the challenges it will face in operating an expanded school, and it clearly describes how it will address those challenges. Other examples of sufficient progress include but are not limited to selecting curricula, revising the staffing plan, and presenting a balanced, conservative budget that reflects all necessary outlays.
3. **Consistency of Mission:** The LEA’s mission, vision, and key design elements are consistent throughlines in the proposed expansion; responsive to the communities the school seeks to serve; and grounded in sound research, proven practice, and/or other reasons demonstrating likely effectiveness.
4. **Inclusiveness:** Each element of the expansion is deliberately designed to be inclusive of all students, including students with disabilities, emerging multilingual learners, and economically disadvantaged students. Over time, the LEA has delivered strong outcomes for all students, as evidenced by student group performance on accountability measures, special education compliance rates, classroom observations, and other monitoring activities.
5. **Leadership Capacity:** The leadership team, which comprises the head of school, board, and other identified key personnel, demonstrates the capacities, commitment, and track record to execute a successful expansion. There is stability at the LEA and campus leadership levels. The board has been

actively engaged in the planning process. For campus replications, the LEA has identified a new school leader for the new campus.

E. Application and Evaluation

Applicants must submit the relevant expansion application no later than **June 1** one year before the start of the school year in which the proposed changes will be implemented.¹⁹ At least 30 business days before the public hearing, DC PCSB staff will notify impacted Advisory Neighborhood Commissions (ANCs) and open the request for public comment. Before the public hearing, DC PCSB staff may conduct a capacity interview to further assess the plan and the founding team's ability to execute it. Factors DC PCSB will consider include, but are not limited to, multi-campus growth or campus replication, recent leadership or board turnover, and significant changes to existing operational or financial plans.²⁰ A school may also request a capacity interview. At a public hearing, the public may provide testimony, and the applicant will discuss the request with the Board.

From its review of the written application, capacity interview (if held), public hearing, and the applicant's past performance, DC PCSB staff will produce a final evaluation and make a recommendation to the Board, as described below. At a subsequent public meeting, the Board will vote to approve the request, approve with conditions, or deny.²¹

Recommendation	Evaluation
Approval	The applicant meets each of the standards for approval.
Approval with conditions	The applicant meets, at a minimum, the standard "Need and Demand," and it misses no more than one additional standard for approval. Factors staff will consider include, but are not limited to: • The severity and scope of the missed standard can be addressed through a condition. • The applicant's response to resolving the issue(s) shows deep prior knowledge and understanding. • The city can sustain this expansion within the context of all other requests received.

¹⁹ For SY 2025–26, DC PCSB will extend this deadline to July 1, 2026. Approved expansions will be effective at the earliest for SY 2027–28.

²⁰ The minimum eligibility assessment of the school may change over the evaluation process. In these instances, DC PCSB will consider the most recent data in its decision-making.

²¹ Applicants can expect the process from application submission to Board vote to last three – four months. DC PCSB will adhere to the *ANC Notification Policy* and its successor policies. See the policy here: <https://bit.ly/3LtvTBI>.

Recommendation	Evaluation
Denial	The applicant has not met, at a minimum, the standard “Need and Demand,” or it meets this standard but misses one or more additional standards. After considering the preceding factors, staff determines the missed standard cannot be resolved at this time.

F. After the Board Vote

An approved LEA will have at least one planning year before the expansion takes effect. During this time, the LEA will, as needed, update its participation in the common lottery, secure a facility, recruit students and staff, and implement other facets of the expansion plan. Conditionally approved LEAs must also address the missed standard, as specified in the charter amendment. DC PCSB will meet with applicants during the planning year to discuss progress and provide technical assistance. Denied applicants may address the identified deficiencies in a future reapplication.

Expansion approval is time-bound. The school must secure a facility (if necessary) and begin enrolling students within 36 months of the Board’s vote. Failure to do so will result in the approval expiring unless extended by a Board vote.

G. De Minimis ECI Requests

An LEA requesting a very small, or “de minimis,” ECI request may petition in its letter of intent for an abbreviated evaluation process. DC PCSB generally defines a de minimis request as adding no more than 25 students or 5 percent of the current enrollment ceiling, whichever is less, and having little to no impact on the surrounding community or school programming. Such requests may skip some steps of the application and evaluation process and still be eligible for approval.

In addition to the letter of intent requirements stated above, the LEA must describe how the request will be implemented across grade levels and campuses, and how it will impact the surrounding community or school programming. DC PCSB will consider the merits of this argument in its assessment of the letter of intent. In its written response, DC PCSB will determine one of three outcomes:

1. **No Objections to Proceeding to a Consent Calendar Vote:** The LEA is not required to develop the relevant expansion application for approval. The ECI request is de minimis in size and impact and meets the Standard for Approval. DC PCSB staff will recommend approval and place the item on the consent

calendar for a board vote at a subsequent public meeting.²² At least 10 business days before the vote, DC PCSB staff will notify impacted ANC and open the request for public comment.²³

2. **No Objections to Proceeding with an Application:** The LEA may proceed with developing the relevant expansion application, but it is ineligible for a consent calendar vote at this time. DC PCSB reserves the discretion to evaluate whether the rationale is sufficiently compelling, de minimis in size and impact, supported by market analysis, and informed by real-time sector and citywide circumstances. As part of its assessment, DC PCSB will identify in its written response areas of concern or questions that must be addressed in its final submission. “No Objections to Proceeding with an Application” does not indicate that an expansion request will ultimately be approved.
3. **Objections to Proceeding:** After reviewing the letter of intent and the LEA’s past performance, DC PCSB finds that the expansion request is unlikely to meet the Standard for Approval. DC PCSB does not recommend that the LEA proceed with developing the relevant expansion application at this time. Any future request should address DC PCSB’s objections.

Disclaimer: This publication is designed to provide information on the subject matter covered. It is distributed with the understanding that the publisher is not engaged in rendering legal, accounting or other professional services. Readers will be responsible for obtaining independent advice before acting on any information contained in or in connection with this policy.

²² The consent calendar is for board actions on routine or non-controversial matters that do not require discussion or debate. Any board member may request at any time prior to the consent calendar vote to remove an item from the consent calendar, whereupon it will be placed on the regular agenda for discussion and a separate vote. Board members take a single vote to “approve all items on the consent calendar.” Prior to this vote, all recusals will be stated for the record and a board member recused from a specific matter on the consent calendar shall be deemed to have not voted on that matter.

²³ This process aligns with how DC PCSB notifies impacted ANCs of charter amendment petitions that have little to no “significance for neighborhood planning and development,” as stated in the *ANC Notification Policy*. See footnote 20.