

Good afternoon. I am Josephine Baker, Chair of the DC Public Charter School Board, and am accompanied today by the Board's executive director, Nelson Smith. We appreciate having this opportunity to comment on the draft short-term plan for the State Education Office's assumption of mandated responsibilities.

The Public Charter School Board has long supported the idea of an independent agency or office reflecting the new landscape of public education in the District: a single large Local Education Agency called DC Public Schools, and 33 smaller ones called public charter schools. In prior communications with the Mayor and Council, we applauded the idea of a so-called "state" agency, but cautioned that the SEO should have limited scope and size, and should respect the jurisdiction of the chartering authorities.

The State Education Office Establishment Act of 2000 created a generally sound framework for this new entity. In the months since passage of the Act, the Mayor's office has moved in an inclusive and thoughtful manner toward implementation. We are encouraged that at every stage, those charged with setting up the SEO have taken pains to consult the charter school community and to invite us to the table.

Today's hearing focuses specifically on the draft plan, which presents a sound basis for establishing the Office's first functions. Its authors should be commended for the lucid narrative explaining how each function evolved. While we will provide some specific suggestions for improving the text itself, I would like to spend a few moments stressing several points of particular importance in the relationship, in the order they are presented in the draft plan.

Concerning food and nutrition services, we are hoping for rapid improvement in the disbursement of payments to charter schools. Too many charter schools have encountered long delays in USDA payments they were due. If staffing is the cause, resources should be provided.

A second issue of concern is the clarity of procurement policy in this area. The two chartering authorities are now responsible for approving contracts over \$25,000, and several schools have already presented food service contracts. The interplay between USDA regulations and local procurement law is murky. We hope the SEO can provide quick and authoritative interpretation when needed.

The draft also calls for enhanced computerization of this function. As the SEO addresses this priority, we strongly suggest further consultation with other agencies that gather data for Federal grant eligibility, Medicaid reimbursement,

and the District's per-pupil formula payments. We should find ways of integrating these systems and reducing the number of times schools are required to provide the same data to different agencies.

We have been pleased to participate in the discussion of enrollment processes and residency verification procedures, and the draft does a good job of laying out the issues and options. We note with pride that charter schools showed remarkable improvement in both these processes this year, but are concerned that the Financial Authority has not yet provided a formal appeal process for issues that arose in the October 2000 enrollment audit. Since the next quarterly payment hinges on the outcome of these appeals, we believe that these issues should be resolved promptly by the Authority and not handed off to the SEO. We include for the record a copy of the Board's response to the enrollment audit.

*official
copy of letter
is being
provided*

We are particularly pleased that the SEO anticipates publishing residency verification guidelines for the next school year by March. This will give schools and families adequate time to prepare. As part of that document, an appeals process must be provided for charter school students whose families cannot provide the required residency documentation. The Board is prepared to handle a reasonable volume of such appeals -- but the SEO might

also consider making this a "state" function, since all public school students in the District are funded through the same per-pupil formula, and since charter schools follow the same residency guidelines as DCPS.

Finally, we fully support the approach proposed in the draft for revision of the uniform per-pupil funding formula. It is especially important that the special education component of the formula be revised to reflect the real costs faced by schools in providing needed services. As the draft notes, there have been sporadic *ad-hoc* attempts to compile data in this area; what's needed now is the kind of thorough comparative study that can fully inform the next budget cycle. We urge that funding be made available, and that the Mayor and Council work together to provide fast-track authority for the contracts needed to execute this analysis.

Although the table of "ten additional responsibilities" is not the principal focus of this hearing, I would like to close by addressing a troubling aspect of this list.

Throughout the early discussions of a State Education Agency, and in the drafting of the Council's bill, the Public Charter School Board stressed that the legislation should respect the boundaries created by the DC School Reform Act with respect to the autonomy of charter schools and the oversight responsibilities of the chartering authorities.