



Wisconsin  
Evaluation  
Collaborative

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# MPS Charter School Evaluation

*for the Milwaukee Public Schools*



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## Section I

# Introduction

# Introduction

In June 2021, the MPS Board of School Directors approved Resolution 2122R-007, which authorized Administration, in collaboration with the Office of Board Governance and the Office of Accountability and Efficiency, to perform a comprehensive evaluation of charter school effectiveness and the impact of charters on MPS. Resolution 2122R-07 can be understood as following up on Resolution 0708R-005, which commissioned an independent evaluation report in 2010 by the Wisconsin Center for Education Research (WCER) at UW-Madison examining selected aspects of MPS's charter school portfolio at that time.<sup>1</sup>

The Wisconsin Evaluation Collaborative (WEC), which is a unit housed within WCER that produces rigorous evaluations of initiatives within PK-12, early childhood, and higher education, is pleased to continue our longstanding research relationship with MPS by submitting this report to the MPS Board of School Directors in response to Resolution 2122R-007. Working in collaboration with the MPS Department of Contracted School Services (which oversees the district's charter schools) and Offices of Board Governance and Accountability and Efficiency, WEC developed and presented a scope of work to the MPS Committee on Student Achievement and School Innovation on March 10, 2022. The scope of work was organized around the following questions and sub-questions:

1

How do MPS authorizing/approval practices compare to other authorizers at the national, state, and local levels?

2

What is MPS's process for reviewing performance and renewing charter contracts with its schools, and how does this compare to the practices of other authorizers at the national and state level?

3

What are key similarities and differences between MPS-authorized charters and those overseen by other authorizers?

- 3a: What are the characteristics of MPS charter schools (collectively and individually) compared to those overseen by other authorizers in terms of student enrollment (demographic characteristics, exit rate, etc.), student engagement (attendance and behavior), and academic performance (attainment and growth on state assessments, AP/IB course-taking, and college enrollment)?
- 3b: How do the programming and discipline policies of MPS charter schools compare to the policies of other authorizers?

4

How do staff in MPS charter schools (administrators and teachers) view the benefits and challenges of charter status, and to what extent do they prompt innovation?

<sup>1</sup> This report is available through UW-Milwaukee at

<https://uwm.edu/officeofresearch/wp-content/uploads/sites/91/2018/04/evaluation-milwaukee-public-charter-schools.pdf>.

While Question 3a includes a descriptive comparison of selected measures of student engagement and achievement across MPS charter school types (instrumentality and non-instrumentality sites) and other authorizers in Milwaukee, it is important to note that the primary goal of this report is not to assess whether MPS charter schools as a group are performing better or worse than other types of schools, including MPS traditional schools nor charters overseen by other authorizers. Questions of this nature, as discussed below, have been the topic of extensive prior research that seems to be mostly inconclusive thus far. Similarly, we were not asked to identify individual MPS charter schools that are performing better than others, nor those that are “beating the odds” by performing better than expected considering their students’ level of prior achievement, although these are clearly topics of interest as MPS considers whether to renew individual charters. Finally, while we include below a summary of the complex financial arrangements involving MPS’s portfolio of charter schools – and financial matters were clearly a topic of great interest which emerged from our focus groups with charter leaders – our report is not a comprehensive financial audit which offers recommendations for the district about whether to expand or reduce its portfolio of charter schools. The complex set of financial considerations associated with MPS’s different types of charters has been addressed in previous reports (see, for example, Chapman et al., 2018), and we do not attempt in this report to replicate these calculations with updated data, since the underlying issues appear largely unchanged over the past several years.

The remainder of our report addresses each of the research questions noted above, in order, following a short description of the data and methods we utilized and a brief summary of Wisconsin’s charter school legislation.

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## Section 2

# Data, Methods, and Policy Background

## Data and Methods

To inform the guiding questions listed above, the WEC research team utilized the following sources of data:

### Quantitative Analyses:

- Publicly-available download files from the Wisconsin Department of Public Instruction
- Charter school records provided by the MPS Department of Contracted School Services

### Qualitative Analysis:

- MPS staff and partners:
  - Two focus groups with current MPS non-instrumentality charter leaders
  - One focus group with current MPS instrumentality charter leaders
  - Interviews with several former leaders of MPS charters and district staff
- Non-MPS staff:
  - Document review and phone interview with the National Association of Charter School Authorizers (NACSA)
  - Document review and phone interviews with selected charter school authorizers from Wisconsin other than MPS, including the following:
    - » City of Milwaukee
    - » UW-Milwaukee
    - » UW-Madison Office of Educational Opportunity
    - » Appleton Area School District
    - » Janesville School District
    - » Verona Area School District
  - Document review and phone interviews involving selected charter school authorizers outside Wisconsin (focusing on those who oversee charters in urban areas), including the following:
    - » Central Michigan University (which oversees 15 current charters in Detroit)
    - » Chicago Public Schools
    - » Denver Public Schools

- » District of Columbia Public Charter School Board (DC PCSB)
- » Indianapolis Public Schools

One of our primary objectives for this report was gathering the perceptions of MPS charter school leaders around what it means to be an instrumentality or non-instrumentality charter, including the perceived benefits and challenges of operating under charter status. To this end, we were fortunate to work with the MPS Department of Contracted School Services (which oversees both instrumentality [IC] and non-instrumentality [NIC] charters in the district) to conduct three separate focus groups, two with NIC leaders and one with IC leaders. A total of 17 different charter leaders participated in at least one of the focus groups, and several NIC leaders participated in both. While all leaders of both groups of MPS charters (IC and NIC sites) were invited, their participation was voluntary, and as such we acknowledge the possibility that the views expressed by those participating in the focus groups may not be fully representative of their colleagues who did not participate. We also recognize that many of the issues identified by charter leaders as areas of concern, such as the services that MPS makes available to its charters and their corresponding funding and administrative fees, are complex, and that some leaders and administrators we did not speak with (such as members of the MPS Board of Directors or district-level administrators) may have different interpretations of the issues raised by charter leaders.

Throughout this report, we highlight several key themes that emerged from the focus groups, with illustrative quotes from both IC and NIC leaders provided as examples. We have anonymized all quotes, as promised to charter leaders at the outset of the focus groups, in order to encourage their honest and forthright responses. We recognize that it might be possible for some readers of this report to make inferences about which specific person provided certain quotes, although this is most definitely not our intention and we have edited some of the quotes slightly to limit (although not completely preclude) this possibility. In the conclusion of this report, we also include a set of recommendations which follow from, and are largely aligned to, the key themes.

## Policy Background on Wisconsin Charter Schools

Charter schools, broadly speaking, are publicly-funded and nonsectarian schools that may not charge tuition and are exempt from many federal and state laws in exchange for greater accountability for financial and student performance. Charter schools operate under a charter which is issued by an approved authorizer and spells out key provisions of the school's operations, including its educational mission, curriculum, type of student served, and metrics used to assess its performance. Wisconsin's initial charter school law, passed in 1993, allowed up to 10 of the state's local school districts to establish two charter schools each. Subsequent revisions to the law by the Wisconsin Legislature lifted the cap on charters and allowed independent entities other than school districts (including UW System campuses, technical colleges, tribal colleges, the City of Milwaukee, and the UW-Madison Office of Educational Opportunity) to authorize charters; these non-district authorizers are often referred to as 2r or 2x based on a section of state statute. Over time, the number of charter schools in operation statewide expanded considerably, to a total of 236 during the 2021-22 school year, with nearly 100 districts having authorized at least one charter (Wisconsin Resource Center for Charter Schools, 2021; Kava, 2021).

Charters authorized by local school districts are classified as either instrumentality (all school personnel are considered employees of the district, and the school operates in facilities owned or leased by the district) or non-instrumentality (school personnel are not considered district employees, and facilities are typically owned or leased by the charter school rather than by the district). In Wisconsin, the vast majority of charter schools authorized by school districts have been instrumentalities, although this is becoming somewhat less the case – particularly (as described below) in MPS.

In the case of charters authorized by a school district, students who are residents of the district are included for revenue limits and general aid, as would be the case for a traditional school. Non-resident students can enroll via open enrollment application, with the charter receiving a transfer payment in these instances as defined by statute (in 2020-21, \$8,125 for a regular education student and \$12,977 for a special education student). District-authorized charters can also participate in categorical aid and grant programs (for example, special education aid). In the case of independent (non-district) charter schools, DPI pays a per-pupil amount defined by statute, which was \$9,165 per student in 2020-21. This amount is an indexed formula that adds any increases in the per-pupil revenue limit and statewide per-pupil categorical aid to the prior year's per-pupil payment (Kava, 2021).

Instrumentality charters authorized by MPS are funded in a manner similar to traditional public schools, with funding amounts based on enrollment and categorical aids (for students who qualify for special education, English Learner, and other services). MPS non-instrumentality sites, conversely, receive in effect the same per-pupil funding amount as independent charters authorized by the City of Milwaukee and UW-Milwaukee (plus categorical aids based on student eligibility), with MPS generally deducting an administrative fee of 3% of the per-pupil allocation (with a few noteworthy exceptions, as discussed below).

From a funding perspective, previous reports (see, for example, Chapman et al., 2018) have noted that MPS's decisions around how many (and which type of) charters to authorize have had significant implications for the district's overall budget, although decisions around charters have been (and continue to be) complex. On the one hand, expanding the number of seats in district-authorized charters (through a combination of approving more new charters and expanding enrollment opportunities in existing charters) provides a way for MPS to slow its steady losses of enrollment (and thus funding) which have occurred over the past two-plus decades as options for families have greatly expanded through the Milwaukee Parental Choice Program, open enrollment to other districts, and independent charter schools. While it is not clear how many families with students enrolled in MPS charter schools (and NIC sites in particular) would have remained in MPS had there been no charter options available to them, it seems reasonable to conclude that a significant number of these families would have left the district for other (non-MPS) options if the district had no charters. Conversely, expanding the portfolio of MPS charter schools – particularly in the case of non-instrumentality sites – reduces the amount of funding that the MPS school board exerts direct control over, and raises questions about the administrative service fees the district levies on its charter schools and whether the district can (and should) provide facilities and services to all (or some) of the charters within its portfolio. These and related questions are not new, but remain very much on the minds of MPS charter school leaders, as discussed throughout this report.

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## Section 3

# Findings

## Authorization and Approval

**Evaluation Question 1:** How do MPS authorizing/approval practices compare to other authorizers at the national, state, and local levels?

### Review/Comparison of Authorization Practices

Charter authorizers we spoke with, both within Wisconsin and in other large urban areas, shared how authorizing trends and practices have evolved over the last 25 years. After a rush of applications in the early 2000s, incentivized by federal planning grants to support the startup of charter schools, authorizers generally described declining numbers of applications to launch new charters in recent years. This mirrors the general trend we show below in Milwaukee and Wisconsin more broadly, in that a rapid period of growth in charter development in the early 2000s has been followed by a leveling off (and in the case of MPS, an outright decline) in both the number of charter schools in operation as well as their collective student enrollment. Data maintained by UW-Milwaukee's charter school office, for example, show that 6-8 applications per year for new charters was typical until around 2015-16, while the number has declined to the 2-4 range per year since then.

As relates to the application and authorization process itself, our review of other authorizers' practices indicates that MPS's policies and procedures do not appear to differ substantially. While no two authorizers' practices are identical, and several authorizers indicated that they constantly review and tweak their application process, the core components of the process tend to include the following:

- Alignment of the application itself to a set of core principles of high-quality charter schools (as developed by the National Association of Charter School Authorizers), including (but not limited to):
  - Academics/curriculum/education
  - Operations and budget
  - Governance
  - Capacity for growth over time
  - Serving needs of student subgroups
  - Community input

- Use of a rubric for scoring applications by a set of trained reviewers
- Public meeting
- Capacity interview to assess applicants' strengths and areas of challenge
- Approval by authorizer's formal governing board (such as the Board of School Directors, in the case of MPS)
- Specified time period in which to complete the application

In MPS, there are three pathways to charter school authorization:

#### Pathway 1: Charter School Proposal

The charter school proposal is a process for seeking charter school approval from the Milwaukee Board of School Directors, and includes the submission of a letter of intent and a formal proposal for consideration and review. Submission of a charter school proposal on or before January 5 will allow the Milwaukee Board of School Directors to consider the new charter school for start-up in July of the following calendar year.

#### Pathway 2: Charter School Petition

The charter school petition is a process for seeking charter school approval from the Milwaukee Board of School Directors by submitting a letter of intent and a formal proposal for consideration and review. According to Administrative Policy 9.12, "the petition shall be signed by at least 10% of the teachers employed by the school district or by at least 50% of the teachers employed at one school of the district." The petition must include the proposal criteria as outlined in the Charter Guidebook. Prospective operators submitting a charter school petition will be scheduled for a public hearing at a Milwaukee Board of School Directors Committee meeting within 30 days of receipt of the charter school petition.

### Pathway 3: Request for Proposals (RFP)

The RFP process was developed to seek new charter schools that meet specific needs and priorities of the district, established by the Superintendent and the Board each year. The RFP process is intended to identify high-quality schools that accelerate academic outcomes for the targeted student population and fulfill the District's program needs. When MPS seeks proposals for high-quality charter schools, the district will consider school proposals by communities that wish to assume more leadership and responsibility in the education process.

Several authorizers also described how a combination of fewer applications in recent years combined with elevated stakes for them as authorizers (shrinking overall public school enrollment and the desire to reduce the number of "failing" schools) has led them to review, modify, and strengthen their authorizing practices. At least two large urban districts, in fact, have put an outright pause on accepting new charter applications so that they can update and implement changes to the initial application process. Specific examples of such changes that surfaced during our interviews with charter authorizers include the following:

- Using a panel of internal and external experts (including those with specific expertise in subjects such as social-emotional learning, academics, school finance, etc.) to evaluate charter applications (rather than relying exclusively on internal reviewers from within the authorizer);
- Having separate application tracks for (1) experienced charter operators (those opening a second location or expanding) or those working with a charter management organization (CMO); and/or (2) operators new to running a school and doing so without a CMO;
- Investing in a paperless application system so that members of a review committee can access application materials simultaneously (rather than waiting for a physical binder to make its way around the review team);
- Taking a more holistic and nuanced approach to evaluating applications (rather than approving an application based solely on rubric scores);

- Drawing clearer lines, and re-defining the relationship between authorizing and supporting: one authorizer, for example, shared that they are trying to focus more on strengthening the authorizing process and leaving supports to other organizations better-suited to do that work. In turn, authorizers can be more focused on initial and renewal authorizations, as well as have the capacity to intervene and close a school if they need to.

Many authorizers referenced declining enrollment as the driver behind efforts to update their authorizing practices. One participant described changing the bar for approving new applications from more of a "how is the proposed school different than what is already occurring within the district" approach to "who can you help and how," in an effort to ensure that new schools will attract and retain students. Another authorizer described a change in focus to making sure that new schools are able to get the student numbers that are forecasted in their budgets: "...In light of declining enrollment, there's a growing difference between a strong application and a viable school." The expectation is that with better articulation of a clear strategy, charter operators will be able to better forecast and meet the needs of the school district. As one authorizer shared, it is "...hard to know how well-subscribed a school will be a year and a half out from approval to opening."

## Charter Leader Perceptions of MPS Authorization Process

During focus groups we held with MPS charter school leaders, few issues or concerns with the application process itself surfaced. Leaders confirmed, in fact, that in their experience, the process for applying initially for a charter from MPS is clear and straightforward, thanks in large part to the guidance provided by the Department of Contracted School Services. Charter leaders did suggest that MPS would benefit from creating more and improved opportunities for them to network amongst themselves, including an informal mentoring role (involving pairings of new and veteran charter leaders) that we believe has merit and is discussed below. In sharp contrast to the application and authorization process, charter leaders had far more concerns about the district's process for reviewing and renewing charters, which is the topic of the next section.

## Review and Renewal

**Evaluation Question 2:** What is MPS's process for reviewing performance and renewing charter contracts with its schools, and how does this compare to the practices of other authorizers at the national and state level?

### Review/Comparison of Renewal Practices

Our review of the processes and policies used by other charter school authorizers (both in Wisconsin and in selected urban areas in other states) to review and make renewal decisions finds that MPS's practices – at least on paper – look fairly similar to other authorizers. Across authorizers, renewal requirements share several features in common, starting with three main criteria around which authorizers tend to base most of their review: academic performance, financial performance, and organizational/operational performance.

We also note, however, that the specific methods by which authorizers review these metrics vary. For example, some have formal and highly-defined scoring systems to determine both whether a school should be renewed and the length of the renewal term. Authorizers also differ somewhat with respect to whether site visits (of a scheduled/announced and/or impromptu nature) are part of the review process. Length of renewal is another area where authorizers differ. For example, Denver (similar to MPS) has renewal terms as short as two years, while the DC PCSB has a 15-year renewal option available for schools which meet all of their goals. (DC PCSB charters also have a “high-stakes” review which occurs every five years.) We also note that authorizers' policies (or state statutes) sometimes allow for longer terms of renewals than authorizers actually give; Chicago Public Schools, for example, has the authority to renew its charters for up to 10 years, but the longest renewal term in actuality thus far has been 7 years. Some authorizers also offer provisional or conditional terms of renewal as a “middle ground” between full renewal and outright non-renewal, if a charter school fails to meet certain performance metrics but does not merit revocation altogether. Authorizers all spoke of their desire to make the renewal process as objective and transparent as possible, but acknowledged in some cases that political considerations can come into play.

In prior years, charter authorizers generally reported denying renewal to a handful of schools in a typical year. Following (and as a result of) the pandemic, however, authorizers reported seeking to avoid school closures as a way to both acknowledge the pandemic's challenges and maintain stability, and thus approached renewal decisions somewhat differently. NACSA does not make specific recommendations around an ideal number of non-renewals, instead recommending that authorizers hold their schools accountable for performance metrics as stated in their charter contract and encouraging them to consider different sorts of performance metrics, such as non-traditional assessments and historical trend data. This advice seems useful looking both backward, as a lesson learned from the pandemic, as well as forward to potential future disruptions; as one interviewee noted, “...even when we don't have pandemics, state testing gets interrupted.”

### MPS Charter School Leader Perceptions

As alluded to above, we observed a clear contrast in MPS charter leaders' perceptions of the district's review/renewal process for its charters compared to its application/initial authorization process. In brief, charter leaders (including both IC and NIC sites) widely view the renewal process (particularly in recent years) as unpredictable, inconsistent, and often subjective. Charter leaders (not universally and unanimously, but a clear majority) described how their experience with the renewal process has been frustrating on a number of levels, in the sense that decisions to renew are perceived as being influenced by criteria and factors that differ from those listed in their contract. Frustration also arises from renewals being issued for shorter lengths of time, which creates challenges for school leaders in terms of convincing families to keep their children enrolled. Charter leaders attribute their frustrations with the renewal process to a variety of factors that include political considerations (such as thinly-veiled philosophical opposition to charters on the part of the MPS Board of School Directors) and a lack of familiarity on the part of some board members with state and district regulations related to charters (particularly when turnover occurs among board members). Example quotes from charter school leaders which help illustrate these perceptions regarding the renewal process include the following:

## Subjective Renewal Criteria

“We went through the renewal process last year at [name of school], and I felt it was a subjective process as we were going through it. It wasn’t predictable...I don’t think that there’s predictability...or even a practice that is objective at this time.” (NIC leader)

“[What’s problematic is] the not-knowing, and not being transparent about what is going on. We hit all of our metrics we do what we’re supposed to be doing and then to be told one thing and find out something else. And then the meeting gets postponed, they’re not going to make a decision right now, they postpone the decision until later. That makes it very difficult.” (NIC leader)

“Every time we go through our renewal process, we have a contract that’s negotiated that defines the metrics by which we would be renewed. While those are clear, and we pay to have an outside third party entity do an audit of our measures on an annual basis, paid from our budget, it was clear the Board didn’t know that that’s something we do, and we’re held accountable to some rigorous metrics and standards on an annual basis. Some of the charter myths and rhetoric are used subjectively in the renewal process to go through a sort of ‘gotcha’ process of asking our students and families and staff questions that are subjective. It doesn’t seem to be in the spirit of partnership.” (NIC leader)

“The way that I would put it is that it doesn’t matter that we’ve met [our performance benchmarks] and exceeded those. There are charter myths that some of our Board members may have. They want to ask questions even if it’s not true of our respective campuses or schools. That have nothing to do with academic, financial, governance metrics.” (NIC leader)

“I remember even 10 or more years ago, when we sat in on a pitch from MPS about coming to charter with them – what they were selling at that point was a criteria of benchmarks. If schools hit those benchmarks, the renewal was automatic. The Board already voted ahead of time saying that if the school meets these benchmarks they will automatically get a 5-year renewal. That way the politics of Board, who won the last election, [didn’t] impact renewals.” (IC leader)

“We beat all the metrics and they’re still questioning us...oh you guys are doing better than the other schools, however, we’re still thinking this will be a 1-year renewal, or maybe 2-year.’ It’s really disheartening with trusting the system and trusting the process as well. A lot of us beat each metric that they set for us, yet there’s still this question mark, even though that’s how they set our contracts up or our authorization up. All of our metrics are the same. Did you beat the attendance rate? Did you beat the suspension rate? The proficiency rate? Retention? We beat all those scores by big numbers. You would think it’s a no-brainer that you’re doing what you’re supposed to be doing as partner, an NIC. I think that’s what it’s supposed to be, and that’s what I expected as well when we went to those conversations.” (NIC leader)

“How do we explain this to our families? How do we explain this to our staff? If it feels arbitrary, feels like things are being decided potentially sometimes on a whim, it doesn’t give us a way to say that MPS has our back. To tell [our] families that this is a fair process. We don’t have the answers to provide our staff and families why this is occurring. It creates doubt and concern to the authorizer who we are trying to tell staff and families is supporting us. It creates perceptions that because of the lack of clarity, it becomes difficult for us to control.” (NIC leader)

“It seems to me that if you’re meeting the criteria, it should be a stamp of approval. It shouldn’t be that the Board gets to decide – we’re just going to do 3 years, not 5 years. If you’re meeting everything, they shouldn’t have a vote that says yea or nay. It should only be an issue if you’re meeting contract measures.” (IC leader)

## Board Knowledge and Philosophy

“I would say that working with [the Department of Contracted School Services] is pretty consistent, administration is pretty consistent. It’s when you get to the Board level, where it’s a roll of the dice and you just don’t know what’s going to happen. When I listen to the Board meetings, a lot of the Board members don’t understand the process that the non-instrumentality schools have to go through to even be authorized with MPS. It doesn’t seem like they’ve done their research...it’s always a roll of the dice, what you’re going to get when you get to that level.” (NIC leader)

“I’m not sure the Board understands the difference between non-instrumentality and instrumentality charter schools to begin with. That’s something that became clear last year at the renewal process.” (NIC leader)

“From what I can tell from now, it seemed a lot easier back then because there was a different superintendent, a different Board, there was a buzz about charters all around. It was a way to highlight your school...[now], I have board members saying, ‘you’re not doing much different than what the district does, why should we renew you?’ And I say, ‘thank you for catching up!’ but we shouldn’t have to change something now because you all figured out what works, we’ve been doing that for years.” (IC leader)

“It was a new Board last year – they were not understanding a lot of it. There were three of us [charter schools up for renewal], and our school was recommended for 5 years. We left that night without our approval. They were thinking well maybe just 3 years because they don’t want to just give them out. It was a hard thing – it’s like telling a high school senior, you’ve met advanced proficiencies, but I’m going to give you proficient. When it came down to it, it got fixed. And it took several months, it was a lot of stress. We had to really educate some very new Board members. That’s scary. To me, if you’re making those kinds of policy decisions, you have to know that stuff, you can’t just change the rules in the middle of the meeting.” (IC leader)

“We have Board members who are philosophically anti-charter. That’s not fair to us who are trying to develop future leaders, and we’re trying to do it in a different way. Ways that haven’t worked as a general MPS school, these are strategies that haven’t worked. We’re trying to do something different, hoping for a better outcome with our students. So philosophically if you just don’t believe in charter schools... and we’re not non-instrumentality, we’re instrumentality charter schools. It really isn’t fair if you philosophically don’t believe in charter schools.” (IC leader)

“This was our [multiple] renewal, and by far it was the hardest because of the philosophical differences. You couldn’t just say, ‘Here you go, here is my pupil achievement for the last three years,’ I had to get so many more of my staff to speak, parents to speak. It wasn’t as easy. That made it very frustrating. What are you talking about? Why are you doing this to us right now? I had to educate the board on the difference between an instrumentality and a non-instrumentality, and remind them that these instrumentalities are part of the MTEA bargaining unit...why are you only going to give 3 years? I thought it was absolutely absurd...I felt blindsided.” (IC leader)

“The biggest thing is the lack of knowledge at the district level as there has been a shift of old guard and new guard coming in...a lack of understanding between IC, NIC, and traditional schools. Having to do double work or double duty is not fair to the administrator or to the school to be split in half or have to do double the work.” (IC leader)

### Length of Renewal and Process

“The contract we have is always a question of if it is going to be a 1 or 3 or 5-year renewal. The transparency of it...you have to guess every time. If it’s one year you have to go through the process again. We hit our metrics on the report card that they asked us to hit – we are supposed to beat MPS results. When you get us there [for the renewal vote], you’re talking to us as if we’re failing, but we’re actually hitting our metrics. Then they say we don’t know if you should be 5 years, then they made us all go to 3, and some to 1. At the end they realized that was unfair, so they pushed it back to 5. That part doesn’t only affect us; it affects the longevity of our parents believing that this is a secure, permanent spot. And that’s where I think the process has to be more transparent. So when we talk to our parents they don’t question if we’re going to be around in 5 years. Can they switch and only give us a 3-year renewal? Will our school exist in three years? Those are the kinds of conversations I have with our families...”  
(NIC leader)

“In the past we went through this process, sailed through it relatively clean, the committee unanimously supported a 5-year contract and all of a sudden it becomes a tug of war, what is it that’s going to be done? And I think that becomes the arbitrary component to this thing, just flip flop back and forth between ‘yes we’re going 3-year, no we’re going 5-year, we don’t know what we’re going to do.’ I think this kind of creates a lot of anxiety and angst for our families as well as for our staff.” (IC leader)

“I struggle with the renewal process being a year long when we have so many things to do and achieve versus renewing our contract. Not only that, MPS...the Board in particular, make it so difficult to renew a charter, when it’s not necessary. We are partners in this venture. The bottom line is we want quality education for our scholars. At the end of the day, we want success. Why can’t we partner? Why can’t we let the NICs be innovative, creative, strategic, and make an impact for the lives of our students? When they’re successful, their families are successful, and the community is successful, and education can deliver on the promise of prosperity.” (NIC leader)

One NIC leader made a specific request to shorten the renewal process:

“My request is to reduce the renewal process from 12 months to 6 months.”

## Selected Characteristics of MPS Charter Schools

**Evaluation Question 3:** What are key similarities and differences between MPS-authorized charters and those overseen by other authorizers?

**3a:** What are the characteristics of MPS charter schools (collectively and individually) compared to those overseen by other authorizers in terms of student enrollment (demographic characteristics, exit rate, etc.), student engagement (attendance and behavior), and academic performance (attainment and growth on state assessments, AP/IB course-taking, and college enrollment)?

### MPS and Milwaukee Charters: Number of Schools, Enrollment Trends, and School Type

MPS authorized its first charters (Highland and Fritsche) in 1997-98, with a significant expansion in the district's

charter portfolio observed starting with the 2001-02 school year (Figure A and Table I). Previous reports (see, for example, Day, Allen, & Henken, 2012) have noted that the district's decision to expand its charter portfolio was a primary strategy intended to help stabilize declining enrollment, since the state's funding formula for public schools is heavily influenced by student counts. **The number of MPS-authorized charters peaked in 2008-09 at 44 before beginning a slow and steady decline that has continued through the current (2021-22) school year, with 19 total charters authorized by the district.** The historical data also show a steady shift toward more non-instrumentality sites over time. Particularly in the early years, and continuing through 2012-13, MPS had more instrumentality sites than non-instrumentalities, but **a significant number of instrumentality closings beginning after the 2011-12 school year gradually transformed the district's charter portfolio into one that is dominated (in terms of both number of sites and student enrollment) by non-instrumentalities.**

Figure A: MPS-Authorized Charter Schools by Type

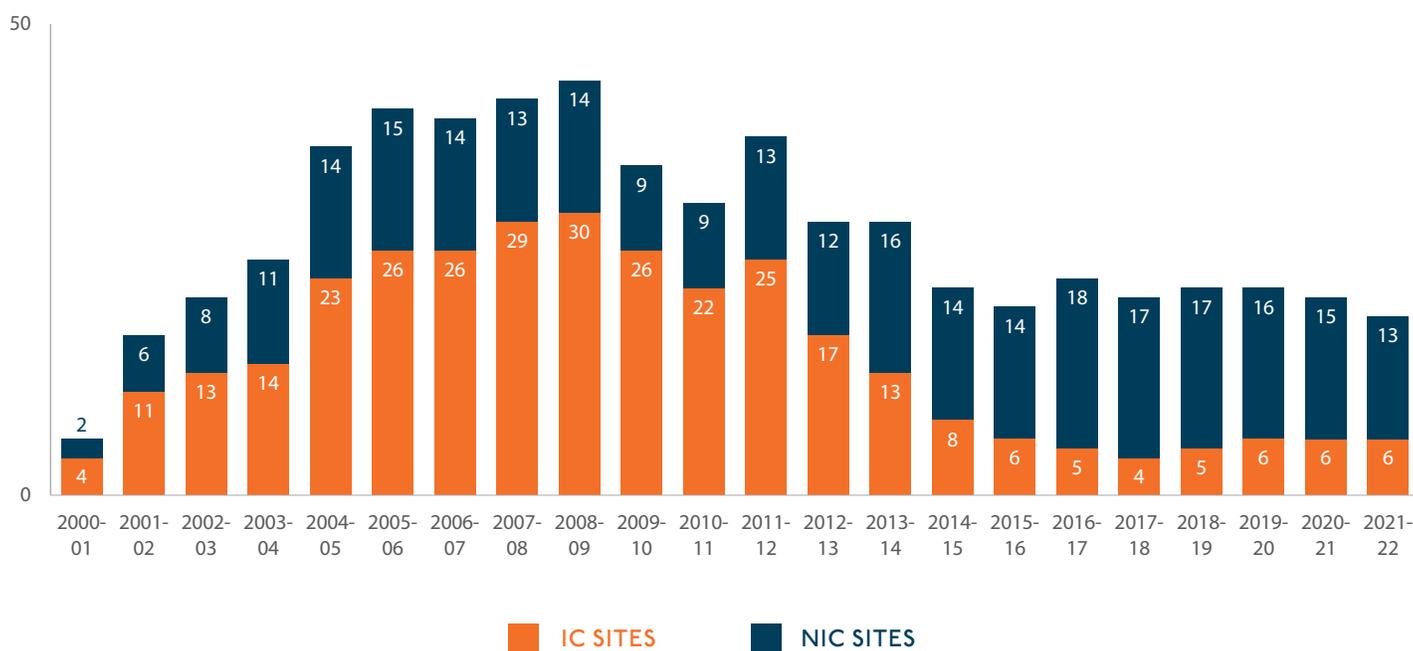


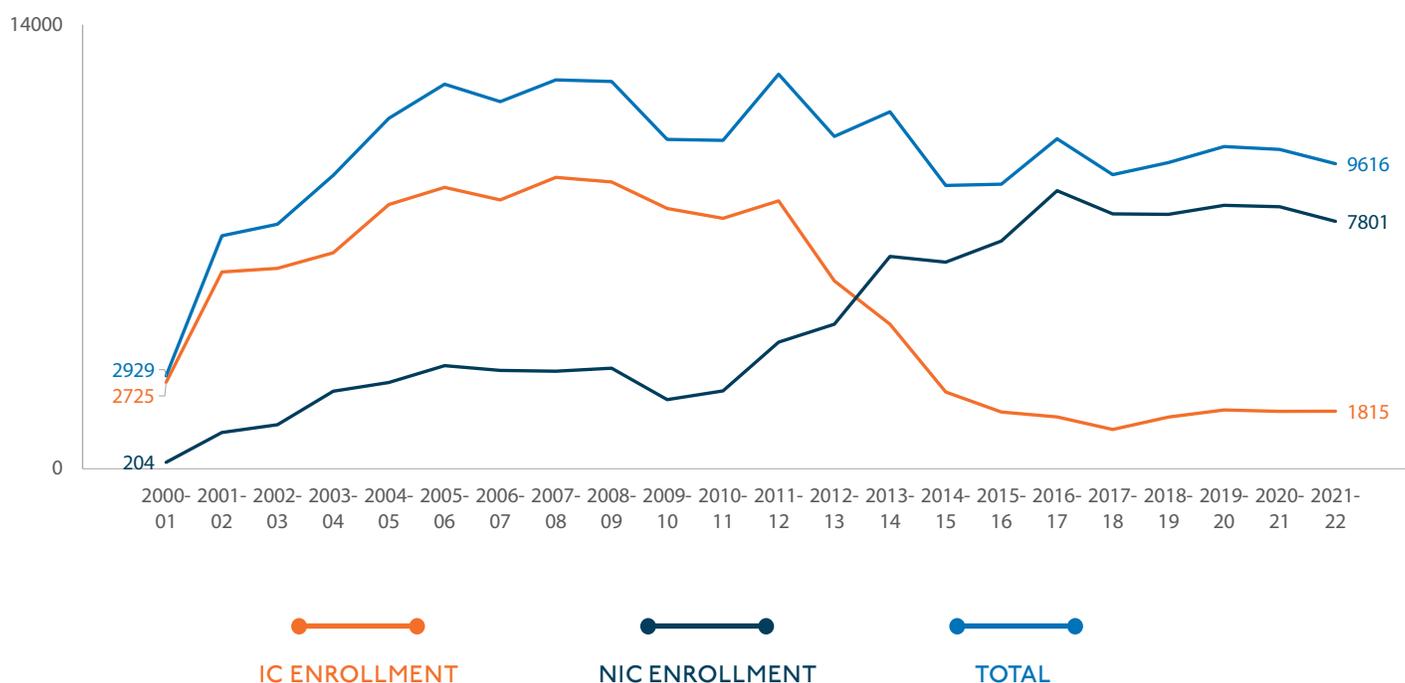
Table I: Number of MPS Charters and Enrollment by Type

	IC SITES	NIC SITES	TOTAL CHARTERS	IC ENROLLMENT	NIC ENROLLMENT	TOTAL CHARTER ENROLLMENT	MPS ENROLLMENT	% CHARTER*
2000-01	4	2	6	2725	204	2929	97,985	3.0%
2001-02	11	6	17	6202	1142	7344	97,762	7.5%
2002-03	13	8	21	6320	1390	7710	97,293	7.9%
2003-04	14	11	25	6810	2243	9253	97,354	9.5%
2004-05	23	14	37	8331	2721	11,052	93,653	11.8%
2005-06	26	15	41	8873	3251	12,124	92,395	13.1%
2006-07	26	14	40	8479	3098	11,577	89,912	12.9%
2007-08	29	13	42	9185	3077	12,262	86,819	14.1%
2008-09	30	14	44	9040	3171	12,211	85,381	14.3%
2009-10	26	9	35	8205	2180	10,385	82,096	12.6%
2010-11	22	9	31	7898	2454	10,352	80,934	12.8%
2011-12	25	13	38	8448	3991	12,439	79,130	15.7%
2012-13	17	12	29	5923	4556	10,479	78,363	13.4%
2013-14	13	16	29	4556	6697	11,253	78,516	14.3%
2014-15	8	14	22	2418	6515	8933	77,316	11.6%
2015-16	6	14	20	1791	7181	8972	75,749	11.8%
2016-17	5	18	23	1635	8768	10,403	76,207	13.7%
2017-18	4	17	21	1240	8035	9275	75,539	12.3%
2018-19	5	17	22	1631	8021	9652	75,431	12.8%
2019-20	6	16	22	1852	8305	10,157	74,683	13.6%
2020-21	6	15	21	1810	8259	10,069	71,510	14.1%
2021-22	6	13	19	1815	7801	9616	69,115	13.9%
%Change				-33.4%	3724.0%	228.3%	-29.5%	

\*Percentage of the district's total enrollment that is in charter schools.

Enrollment trends for MPS-authorized charters generally mirror the two main trends evident in the number of charter sites, with **total enrollment in the district's charters peaking at 12,439 students in 2011-12 before a gradual (although not entirely linear) decline to just over 9600 in the current (2021-22) school year.** At the time of peak charter enrollment in 2011-12, 15.7% of MPS total enrollment was in charters, compared to 13.9% during the 2021-22 school year. Over this same timeframe of 20+ years (2000-01 through 2021-22), MPS total enrollment declined by nearly 30,000 students, or nearly 30%. Enrollment in MPS non-instrumentality sites surpassed that of instrumentality sites beginning in 2013-14 (Figure B), and **81.2% of total MPS charter enrollment was situated in non-instrumentality sites as of 2021-22.**

**Figure B: MPS Charter Enrollment (Total and Instrumentality vs. Non-Instrumentality)**



For local (Milwaukee) context, we also show below (Table 2 and Figures C and D) how the number of charters authorized by MPS (and their collective enrollment) compares to the other two authorizers in Milwaukee (the City of Milwaukee and UW-Milwaukee) over the last ten years (2013-14 through 2021-22). **MPS has 10 fewer charters in operation and 14.5% fewer students enrolled in charters as of the current year (2021-22) compared to 2013-14, which resembles the City of Milwaukee in terms of decreases in both numbers. UW-Milwaukee, by contrast, added three charter sites and has 21% higher enrollment in charters over this same timeframe.**

**Table 2: Number of Charters in Operation and Total Charter Enrollment for Milwaukee Authorizers**

	MPS:		UWM:		CITY OF MILWAUKEE:	
	SITES	ENROLLMENT	SITES	ENROLLMENT	SITES	ENROLLMENT
2013-14	29	11,253	12	4,750	10	3,219
2014-15	22	8,933	12	4,883	10	3,510
2015-16	20	8,972	13	5,154	10	3,738
2016-17	23	10,403	13	4,071	8	3,330
2017-18	21	9,275	13	4,297	8	3,273
2018-19	22	9,652	13	4,549	9	3,425
2019-20	22	10,157	15	5,347	7	2,903
2020-21	21	10,069	14	5,498	7	2,841
2021-22	19	9,616	15	5,747	7	2,862
Change	-10	-14.5%	+3	21.0%	-3	-11.1%

Figure C: Number of Charter Sites by Authorizer

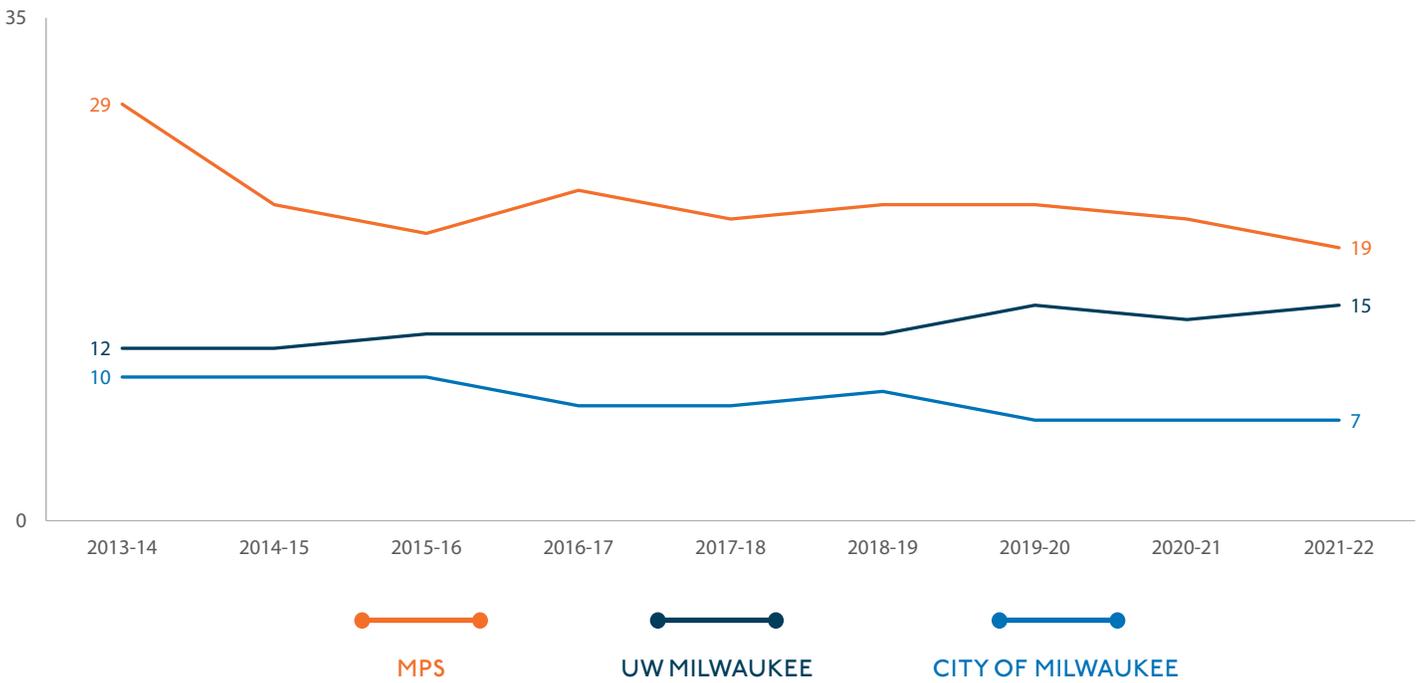
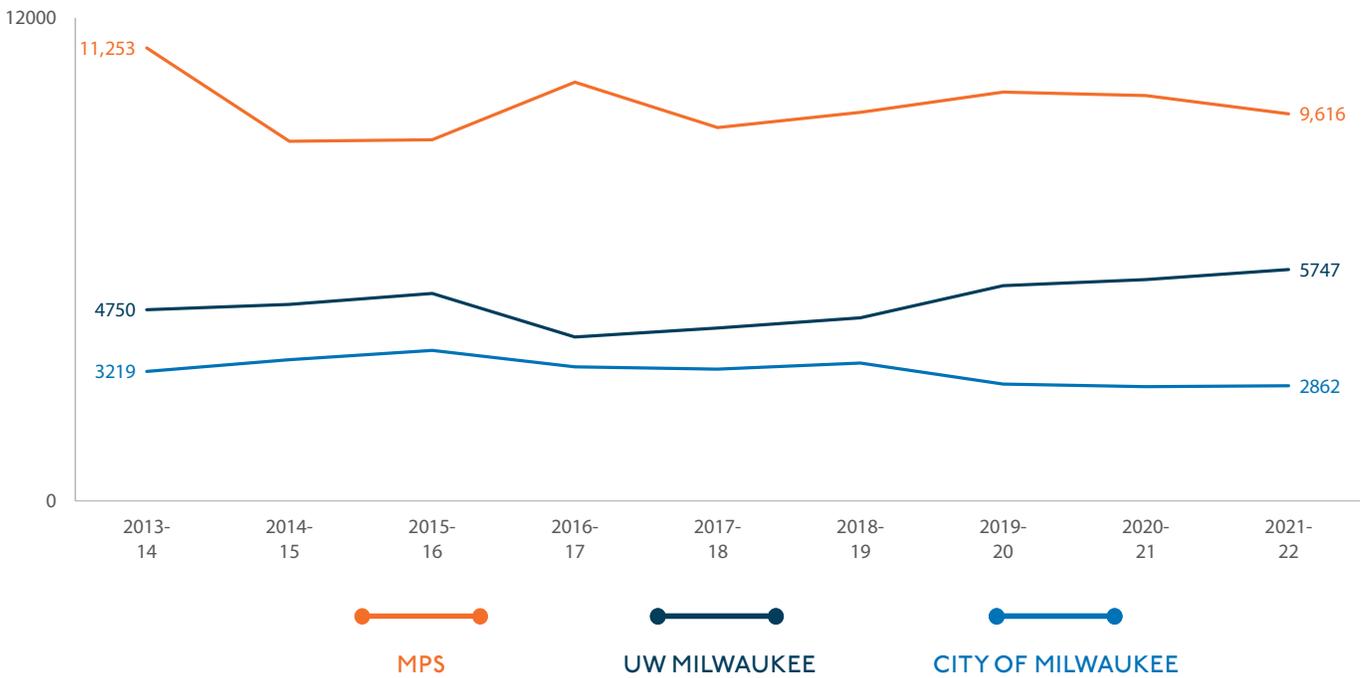


Figure D: Total Student Enrollment in Charter Schools, by Authorizer



According to records dating back to 1997-98 maintained by the Wisconsin Resource Center for Charter Schools (WRCCS), housed at Cooperative Educational Service Agency (CESA) 9, **a total of 56 charter schools authorized by MPS have closed for a variety of reasons.** This includes 36 instrumentality sites and 20 non-instrumentality sites, with the number of closures varying by year, from as few as zero (in multiple years) to as many as nine (at the conclusion of the 2011-12 school year). WRCCS records provide reasons for some (although not all) charter school closures, and in some cases multiple reasons are provided for a single closure. The most common reasons cited for closure of MPS-authorized charters include academic performance, low enrollment, and financial difficulties. Over the same timeframe (dating back to 1997-98), six charter schools authorized by the City of Milwaukee have closed, along with seven authorized by UW-Milwaukee (although both of these authorizers, of course, have authorized far fewer schools than has MPS).

WRCCS also maintains a Charter School Yearbook that allows all charters in the state to self-identify certain attributes, including the grade span/s of the students they serve, their primary educational model, and the type of

students they serve. Tables 3-5 below provide a summary of this information for the 2021-22 school year for MPS charters (divided into IC and NIC sites), City of Milwaukee charters, and UW-Milwaukee charters. Note that schools can self-identify multiple categories for each table – that is, a school can self-identify as serving any combination of elementary, middle, and high school students, and have multiple educational models (Core Knowledge and Project-Based were frequently chosen for the same school, for example). Charters were also free to not self-identify for any characteristics, so counts of schools for any attribute may not equal the number of schools actually in existence.

In terms of grade span (Table 3), charters overseen by all three authorizers (MPS, the City of Milwaukee, and UW-Milwaukee) are more numerous at the elementary and middle grades, with a PK-8 schools a common configuration. For educational model type (Table 4), a focus on Core Knowledge, Project-Based Learning, and Personalized Learning is evident in schools' self-identification, while for type of student served (Table 5), the largest group of charters overseen by all three authorizers focuses on serving all students, although several cater to English Learners or At-Risk students.

**Table 3: Grade Spans of Charter Schools by Authorizer, 2021-22**

GRADE SPAN*	MPS IC (N=6)	MPS NIC (N=13)	CITY OF MILW. (N=7)	UWM (N=16)
Elementary	4	9	5	10
Middle	2	10	5	9
High	2	5	3	3

\*Schools may fall into more than one category and thus counts may not equal the number of schools.

Table 4: Primary Educational Models by Authorizer, 2021-22

EDUCATIONAL MODEL	MPS IC (N=6)	MPS NIC (N=13)	CITY OF MILW. (N=7)	UWM (N=16)
Community School				5
Competency-Based	2			
Core Knowledge	1	9	1	9
Dual Language Immersion/Bilingual	1	1		
Environmental			1	
Expeditionary Learning		1		
Fine Arts	1			
Inquiry/Problem-Based	2	4	1	
Interdisciplinary				1
International Baccalaureate			1	
Montessori		1	1	1
No Excuses		1		
Personalized Learning		4	1	4
Project-Based			5	2
STEM	1		1	
Technology Integration			1	

Table 5: Type(s) of Students Served by Authorizer, 2021-22

STUDENTS SERVED	MPS IC (N=6)	MPS NIC (N=13)	CITY OF MILW. (N=7)	UWM (N=16)
All Students	5	12	5	12
English Learners	1			
At-Risk Students		2	2	1

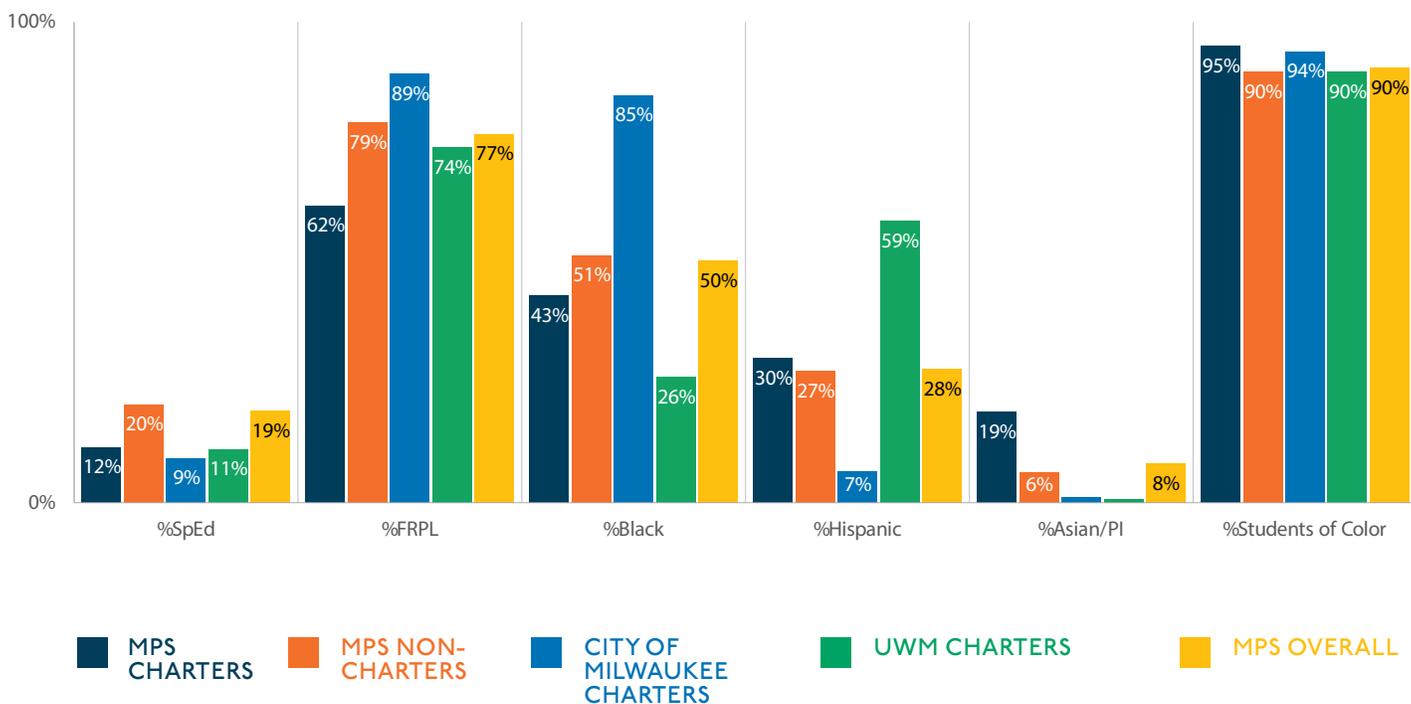
\*Schools may fall into more than one category and thus counts may not equal the number of schools.

## Student Demographics

In terms of student demographics, Figure E and Table 6 below show the percentage of total enrollment in different MPS school types (instrumentality and non-instrumentality charters, all charters combined, all non-charters combined, and the district overall) comprised of selected student subgroups as of the 2021-22 school year. We also show, for comparison purposes, the percentage of total enrollment for these same student subgroups enrolled in charter schools authorized by the City of Milwaukee and UW-Milwaukee. Observations regarding student demographics include the following:

- MPS instrumentality charters are similar to MPS overall in terms of many student demographics (including Special Education, free/reduced price lunch, and students of color), but enroll a higher percentage of English Learner and Hispanic/Latinx students, and a lower percentage of Black students.
- MPS non-instrumentality charters are similar to MPS overall in terms of enrollment of English Learner, Black, and Hispanic/Latinx students, but somewhat lower in terms of Special Education students.
- City of Milwaukee and UW-Milwaukee charters enroll similar percentages of Special Education students (compared to MPS non-instrumentality charters) and free/reduced price lunch (compared to MPS instrumentality charters), with City charters having higher shares of Black students and UWM charters enrolling comparably more Hispanic/Latinx students

Figure E: Selected Student Demographics by School Type, Fall 2021



\*FRPL = Free/Reduced Price Lunch

Table 6: Selected Student Demographics by School Type, 2021-22

	MPS IC	MPS NIC	MPS CHARTERS (IC + NIC)	MPS NON-CHARTERS	MPS OVERALL	CITY OF MILW. CHARTERS	UWM CHARTERS
Total Enrollment	1815	7801	9616	59,499	69,115	2862	5747
SpEd	19.8%	9.6%	11.5%	20.4%	19.1%	9.3%	11.1%
FRPL	81.8%	57.1%	61.8%	79.1%	76.7%	89.2%	73.9%
English Learners	25.5%	13.2%	15.5%	12.8%	13.2%	2.0%	18.0%
American Indian	0.2%	0.1%	0.1%	0.5%	0.4%	0.1%	0.2%
White	13.1%	3.1%	5.0%	10.4%	9.6%	6.0%	6.9%
Black	27.3%	46.8%	43.1%	51.4%	50.3%	84.7%	26.1%
Hispanic	50.8%	25.2%	30.0%	27.4%	27.8%	6.5%	58.6%
Asian/Pacific Islander	3.3%	22.6%	19.0%	6.4%	8.1%	1.2%	0.9%
2 or More Races	5.3%	2.2%	2.8%	3.9%	3.8%	1.5%	3.7%
Students of Color	86.9%	96.9%	95.0%	89.6%	90.4%	93.9%	89.6%

## Descriptive Comparison of Selected Outcome Measures

In addition to informing charter authorizers' practices related to initial application/authorization and renewal, we were also asked to summarize selected student engagement and outcome measures contrasting MPS-authorized charters with schools overseen by other authorizers (particularly City of Milwaukee and UW-Milwaukee charters). Comparisons to charters overseen by other authorizers would be informative as well, but differences across states in terms of key indicators such as proficiency rates on state assessments, and even how attendance and suspension rates are calculated, makes this a challenging task which we did not undertake for this report.

We note that there are generally more student engagement and outcome measures for older students (e.g., those in high school) compared to younger (elementary) students, despite the fact (as shown below) that the charter schools overseen by MPS and other authorizers are disproportionately elementary and middle schools. We also note that the student engagement and outcome measures summarized below are by no means an exhaustive list of all the measures we could have examined, and in fact there are numerous other indicators which would be useful indicators of school performance. One example here would be stakeholder perceptions of school environment as measured by tools such as the MPS Essentials of School Climate and Culture (ESCC) survey, which is completed by students and staff. Unfortunately, ESCC was either not administered at all, or had very low response rates in most schools, for the past two school years (2019-20 and 2020-21) due to the pandemic – and some MPS NIC sites administer their own climate survey (or none at all), making comparisons to traditional MPS schools impossible.

It is also worth pointing out that the data summarized below are descriptive in nature, meaning that they do not attempt to apply statistical controls for differences in student demographics or prior achievement that may influence outcomes. In other words, our goal was not to make a conclusive statement about whether MPS-authorized charters as a group (nor individually) are performing better or worse than traditional MPS schools or charters overseen by other authorizers – nor better or worse than might be expected given their student populations.

Differences between charters and traditional MPS schools in terms of selected student outcomes, in fact, have been studied extensively dating back to the early 2000s. While we most definitely did not conduct an exhaustive review of the many studies which have examined the performance of charter school students in Milwaukee over the past 20+ years, a prevailing theme is that this body of research contains studies (see, for example, Lavertu & Witte, 2009;<sup>2</sup> Witte et al., 2010;<sup>3</sup> Witte et al., 2012<sup>4</sup>) that have found positive effects of Milwaukee students having attended charters – but that the positive effects are generally small and inconsistent across subjects and years.

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2 [https://www.brookings.edu/wp-content/uploads/2016/06/03\\_charter\\_lavertu\\_witte.pdf](https://www.brookings.edu/wp-content/uploads/2016/06/03_charter_lavertu_witte.pdf).

3 <https://scholarworks.uark.edu/cgi/viewcontent.cgi?article=1068&context=scdp>.

4 <https://scholarworks.uark.edu/cgi/viewcontent.cgi?article=1074&context=scdp>.

WCER's own study of MPS charters from 2010,<sup>5</sup> which compared the district's instrumentality and non-instrumentality sites (separately) to all other (non-charter) schools in the district of the same grade span (elementary, middle, high), reached similar conclusions, including the following:

- No statistically significant differences in attendance after controlling for student demographics and prior attendance;
- Small positive effects of charter school attendance upon reading and math growth, but only in some years (not across the board, in both subjects across multiple years).

In fact, one of our main conclusions was that differences in student outcomes were larger within school types than across types. In other words, even for outcomes where we found a small, statistically significant difference between either IC or NIC sites compared to MPS non-charter sites, the variation within each school type was more noteworthy than the differences we found across types. Put differently, each school type we examined (IC, NIC, and non-charter sites) displayed a wide range of performance across individual school sites, such that this became the dominant story, rather than a clear picture emerging that one type consistently and clearly produced more favorable outcomes.

We also note that while statistically significant differences in student outcomes often receive considerable attention in education and other social science research, they can be over-interpreted in the sense that (a) statistical significance is heavily influenced by sample size; and (b) statistically significant differences do not always convey practical significance. In the case of research comparing charters to other types of publicly-funded schools – particularly in the case of studies that utilize multi-year data sets – sample size is often large enough (involving hundreds or thousands of students) to produce findings that are statistically significant, but so small that they lack practical significance.

With this brief background in mind, we present below a descriptive summary of selected student engagement and outcome measures for MPS charter schools and comparison groups. Data for all comparisons is drawn from publicly-available files maintained by the Wisconsin Department of Public Instruction.<sup>6</sup> Comparison groups used in the analyses, along with their abbreviations as used in the graphs below, are as follows:

- All MPS instrumentality charter (IC) sites
- All MPS non-instrumentality charter (NIC) sites
- All independent (non-MPS) charter schools in Milwaukee (e.g., those authorized by the City of Milwaukee and UW-Milwaukee)
- All MPS traditional (non-charter) schools
- All MPS sites combined (both types of charters + traditional sites)

5 <https://uwm.edu/officeofresearch/wp-content/uploads/sites/91/2018/04/evaluation-milwaukee-public-charter-schools.pdf>.

6 <https://dpi.wi.gov/wisedash/download-files>

## Attendance

Figure F and Table 7 below show average daily attendance by school type from the 2005-06 school year through 2020-21 (the most recent year of available data as of this writing). All school types showed COVID-related attendance declines in 2020-21 except for instrumentality charters, whose attendance remained steady. We are not aware of any specific practices or differences in reporting of data between instrumentality charters and other school types that would account for IC sites' attendance holding steady during the pandemic, although this could certainly be a topic of further inquiry.

Figure F: Average Daily Attendance by School Type, 2005-06 through 2020-21

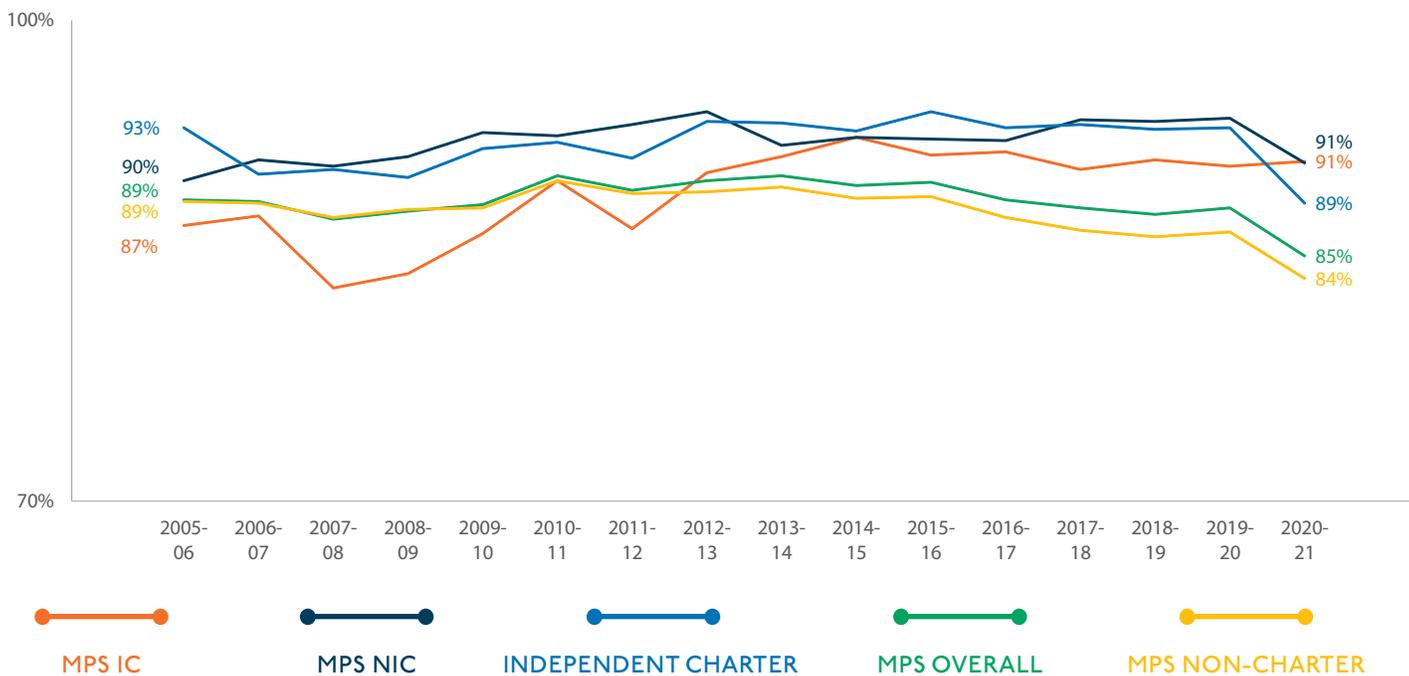


Table 7: Average Daily Attendance by School Type, 2005-06 through 2020-21

YEAR	MPS IC	MPS NIC	INDEPENDENT CHARTER	MPS OVERALL	MPS NON CHARTER
2005-06	87.2%	90.0%	93.3%	88.8%	88.7%
2006-07	87.8%	91.3%	90.4%	88.7%	88.6%
2007-08	83.3%	90.9%	90.7%	87.6%	87.7%
2008-09	84.2%	91.5%	90.2%	88.1%	88.2%
2009-10	86.7%	93.0%	92.0%	88.5%	88.3%
2010-11	90.0%	92.8%	92.4%	90.3%	90.0%
2011-12	87.0%	93.5%	91.4%	89.4%	89.2%
2012-13	90.5%	94.3%	93.7%	90.0%	89.3%
2013-14	91.5%	92.2%	93.6%	90.3%	89.6%
2014-15	92.7%	92.7%	93.1%	89.7%	88.9%
2015-16	91.6%	92.6%	94.3%	89.9%	89.0%
2016-17	91.8%	92.5%	93.3%	88.8%	87.7%
2017-18	90.7%	93.8%	93.5%	88.3%	86.9%
2018-19	91.3%	93.7%	93.2%	87.9%	86.5%
2019-20	90.9%	93.9%	93.3%	88.3%	86.8%
2020-21	91.2%	91.1%	88.6%	85.3%	83.9%

## Behavior

Figures G and H, along with Tables 8 and 9, show suspension rates for students in the same set of comparison schools as we used for attendance analyses. Changes in DPI reporting for suspensions requires two separate sets of figures and tables. From 2007-08 through 2015-16 (Figure G and Table 8), suspension rates were calculated as the number of students enrolled in a school who were suspended at least once divided by the school's third Friday enrollment. Differences across school types for this type of suspension rate start out (in 2007-08) rather large, with instrumentality charters suspending a higher share of students than other school types. By 2015-16, however, suspension rates are more similar across school types, though NICs and independent charters were still lower.

Figure G: Suspension Rates of MPS Schools by School Type, 2007-08 to 2015-16

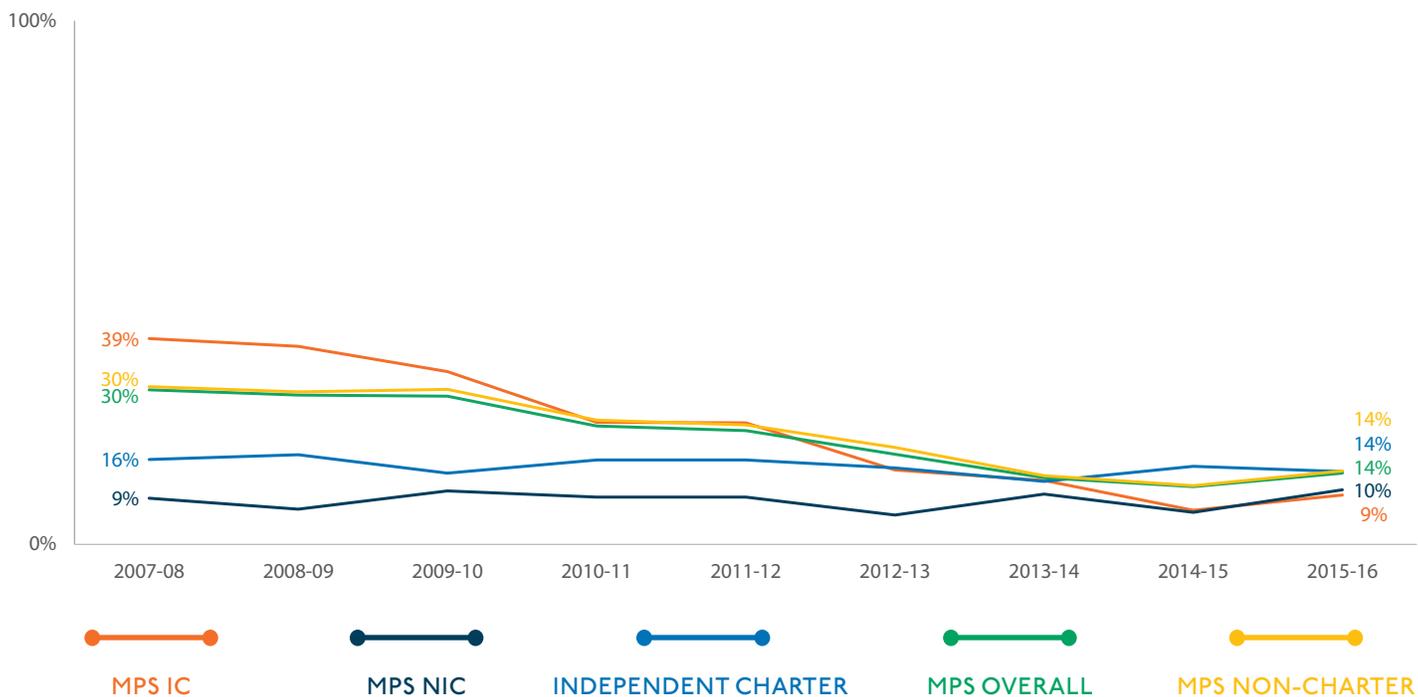
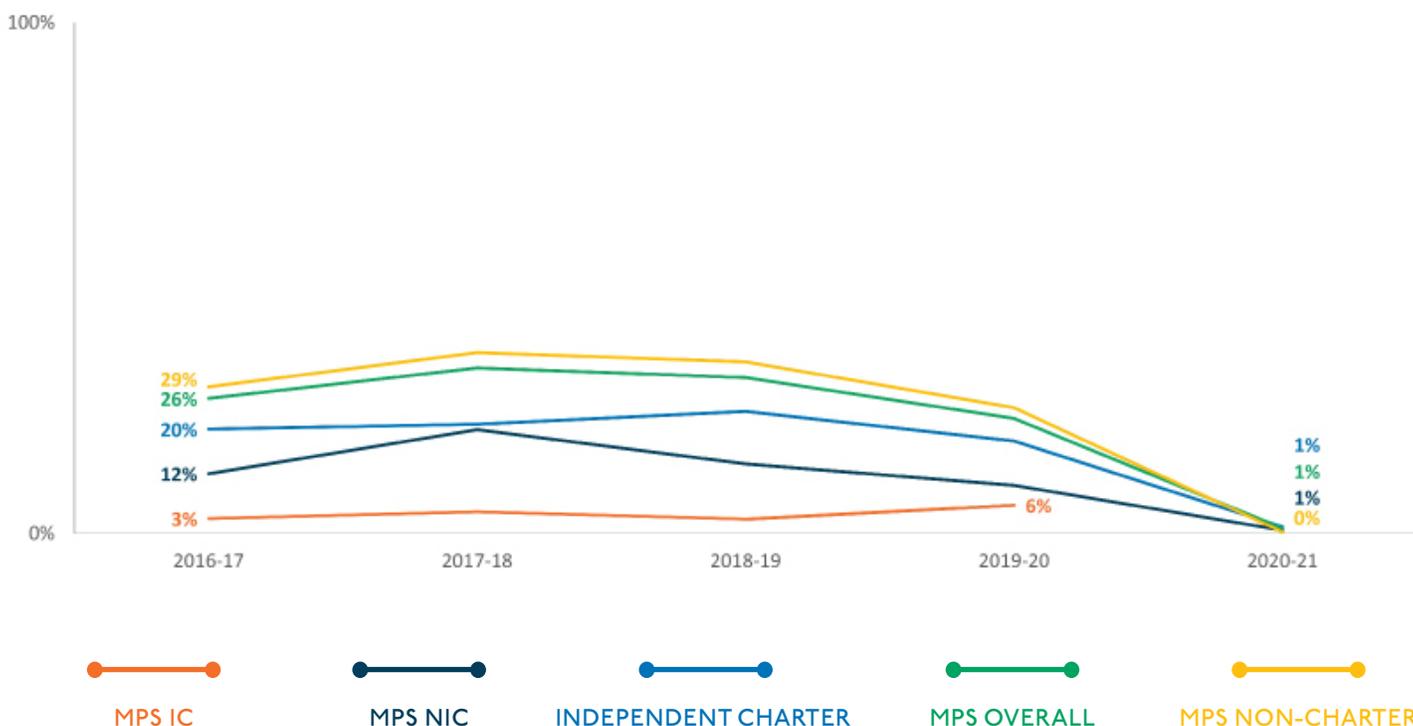


Table 8: Suspension Rates of MPS Schools by School Type, 2007-08 to 2015-16

CHARTER TYPE	2007-08	2008-09	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16
MPS IC	39.3%	37.8%	33.0%	23.3%	23.2%	14.2%	12.2%	6.5%	9.4%
MPS NIC	8.8%	6.7%	10.2%	9.0%	9.0%	5.6%	9.6%	6.1%	10.4%
Independent Charter	16.2%	17.1%	13.6%	16.1%	16.1%	14.6%	12.0%	14.9%	13.9%
MPS Overall	29.5%	28.5%	28.3%	22.6%	21.7%	17.2%	12.7%	11.0%	13.6%
MPS Non-Charter	30.1%	29.1%	29.6%	23.7%	22.8%	18.5%	13.1%	11.2%	14.0%

Starting in 2016-17, DPI reporting for suspensions switched to tracking incidents, or how many total suspensions occurred on the part of all students enrolled within a school divided by third Friday enrollment. Using this metric, traditional (non-charter) MPS schools had higher suspension rates through 2019-20, with IC sites having much lower rates, though IC sites did not have sufficient data for the 2020-21 school year. We also observe that suspension rates for all school types decreased to near zero in 2020-21 due to the pandemic, which makes sense given that students were not physically in school (Figure H and Table 9).

Figure H: Suspension Rates of MPS Schools by School Type, 2016-17 to 2020-21



**Table 9: Suspension Rates of MPS Schools by School Type, 2016-17 to 2020-21**

CHARTER TYPE	2016-17	2017-18	2018-19	2019-20	2020-21
MPS IC	2.9%	4.2%	2.8%	5.5%	
MPS NIC	11.7%	20.3%	13.6%	9.4%	0.6%
Independent Charter	20.4%	21.4%	23.9%	18.1%	1.3%
MPS Overall	26.4%	32.4%	30.5%	22.5%	1.0%
MPS Non-Charter	28.7%	35.4%	33.6%	24.6%	0.3%

## Advanced Placement Course-Taking

We have broken AP course-taking into two separate analyses: rates of participation and number of exams taken. It is important to note that there are fewer high school students enrolled in all types of charters in Milwaukee (those authorized by MPS as well as by other authorizers) relative to elementary and middle school students. Accordingly, AP data in the figures and tables below show more variability from year to year for charters compared to traditional MPS schools, and no data are available at all for some year-school type combinations. One general pattern that does emerge across AP indicators is that NIC sites have higher rates across these measures.

Figure I and Table I0 show the AP exam participation rate, which we calculate as the percentage of high school students in each school type who took at least one AP exam in each year of data divided by total high school enrollment for each school type.

Figure J and Table II show the AP course-taking rate, which we calculate as the total number of AP exams taken by all high school students for each school type divided by the total number of high school students enrolled for each school type.

Figure I: Percentage of Students Taking at least one AP Exam, by School Type, 2006-07 to 2020-21

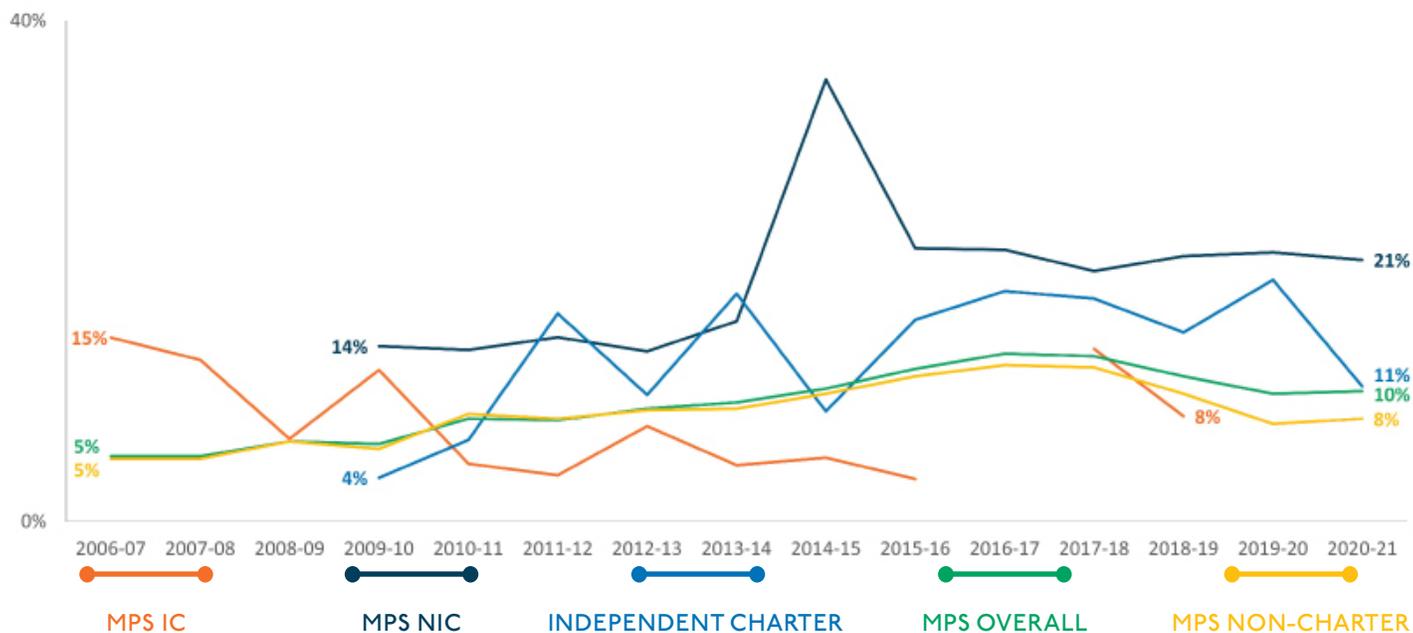


Table 10: Percentage of Students Taking at least one AP Exam, by School Type, 2006-07 to 2020-21\*

YEAR	MPS IC	MPS NIC	INDEPENDENT CHARTER	MPS OVERALL	MPS NON-CHARTER
2006-07	14.7%	5.5%		5.2%	5.0%
2007-08	12.9%			5.2%	5.0%
2008-09	6.6%			6.4%	6.4%
2009-10	12.1%	14.0%	3.5%	6.2%	5.8%
2010-11	4.6%	13.7%	6.5%	8.2%	8.6%
2011-12	3.7%	14.7%	16.6%	8.1%	8.2%
2012-13	7.6%	13.6%	10.1%	9.0%	8.9%
2013-14	4.5%	16.0%	18.2%	9.5%	9.0%
2014-15	5.1%	35.3%	8.8%	10.6%	10.2%
2015-16	3.4%	21.8%	16.1%	12.2%	11.6%
2016-17		21.7%	18.4%	13.4%	12.5%
2017-18	13.8%	20.0%	17.8%	13.2%	12.3%
2018-19	8.4%	21.2%	15.1%	11.6%	10.2%
2019-20		21.5%	19.3%	10.2%	7.8%
2020-21		20.9%	10.8%	10.4%	8.2%

\*Missing values indicate either no data or data suppression due to a low number of exam-takers.

Figure J: AP Course-Taking Rate by School Type, 2006-07 to 2020-21

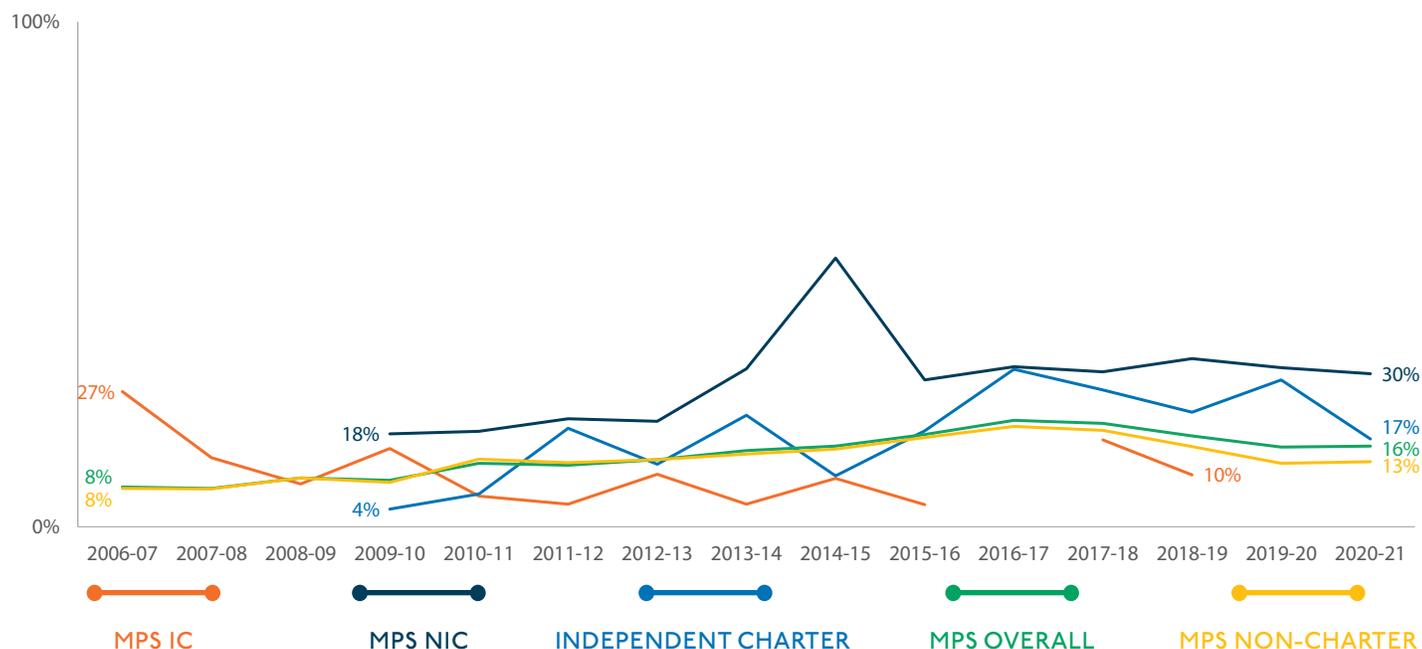


Table II: AP Course-Taking Rate by School Type, 2006-07 to 2020-21\*

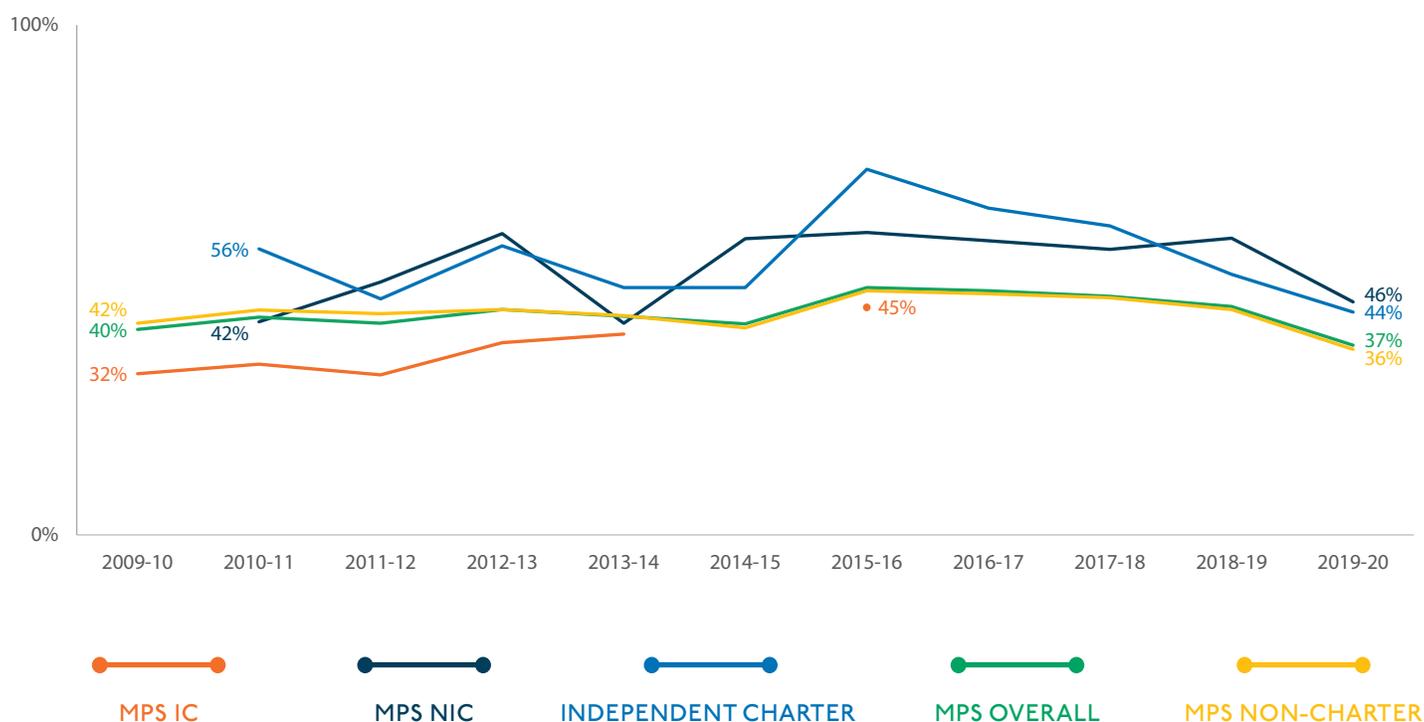
YEAR	MPS IC	MPS NIC	INDEPENDENT CHARTER	MPS OVERALL	MPS NON-CHARTER
2006-07	26.8%	9.8%		7.9%	7.6%
2007-08	13.7%			7.6%	7.5%
2008-09	8.5%			9.7%	9.7%
2009-10	15.5%	18.4%	3.5%	9.2%	8.8%
2010-11	6.1%	18.9%	6.5%	12.6%	13.4%
2011-12	4.5%	21.4%	19.5%	12.2%	12.7%
2012-13	10.4%	20.9%	12.4%	13.3%	13.3%
2013-14	4.5%	31.3%	22.1%	15.1%	14.4%
2014-15	9.6%	53.2%	10.1%	16.0%	15.4%
2015-16	4.4%	29.1%	19.0%	18.3%	17.7%
2016-17		31.7%	31.2%	21.1%	19.9%
2017-18	17.2%	30.7%	27.1%	20.5%	19.1%
2018-19	10.3%	33.3%	22.7%	18.0%	15.9%
2019-20		31.5%	29.1%	15.8%	12.6%
2020-21		30.3%	17.4%	16.0%	12.9%

\*Missing values indicate either no data or data suppression due to a low number of exam-takers.

## Postsecondary Enrollment (First Fall)

We show data for postsecondary enrollment by school type in Figure K and Table I2 below,<sup>7</sup> with the caveat again of low sample size (and thus high year-over-year variability) for some school types (particularly IC sites).

Figure K: Postsecondary Enrollment Rate of MPS Schools by School Type, 2009-10 to 2019-20



<sup>7</sup> We calculated postsecondary enrollment rates by dividing the number of postsecondary enrollees in the first fall after graduation by all students who graduated from high school in four years. Some years of data did not contain students who graduated after five or six years, and we wanted to show trends over time; thus, for sake of comparison, this might be slightly different from the way DPI calculates postsecondary enrollment. Additionally, we removed any data points with 50 or fewer total students.

**Table 12: Postsecondary Enrollment Rate of MPS Schools by School Type, 2009-10 to 2019-20\***

YEAR	MPS IC	MPS NIC	INDEPENDENT CHARTER	MPS OVERALL	MPS NON-CHARTER
2009-10	31.6%			40.3%	41.5%
2010-11	33.5%	41.8%	56.1%	42.7%	44.1%
2011-12	31.4%	49.6%	46.3%	41.5%	43.4%
2012-13	37.7%	59.1%	56.7%	44.2%	44.2%
2013-14	39.4%	41.5%	48.5%	42.9%	43.0%
2014-15		58.1%	48.5%	41.4%	40.6%
2015-16	44.6%	59.3%	71.7%	48.5%	47.9%
2016-17		57.7%	64.1%	47.9%	47.3%
2017-18		56.0%	60.6%	46.8%	46.5%
2018-19		58.2%	51.1%	44.8%	44.2%
2019-20		45.7%	43.7%	37.2%	36.4%

\*Missing values indicate either no data or data suppression due to a low number of students.

## Attainment and Growth

A final set of student outcome measures we present for context involve attainment and growth scores from DPI's school report cards and proficiency data from the state Forward exam. A major caveat with assessment data is that test participation rates (Table 13) vary widely across school types for 2020-21 because of the pandemic, with traditional MPS schools and instrumentality charters (which remained online for much longer than many NIC and independent charter sites) having much lower participation rates.

Figures L and M (and Tables 14 and 15) show changes over time by school type in attainment and growth scores from the state report card, starting with 2011-12 (the first year for which report card data are available). (We note that there are no report card data for 2014-15 due to a change in state testing, nor in 2019-20 due to the pandemic.) Attainment and growth are reported on a 0-100 scale, as well as 0-50 scales for English Language Arts (ELA) and Math (except in 2020-21, when ELA and Math scores were on a 0-100 scale as well). The attainment measure is a proficiency index that awards points for the distribution of students across the four categories of proficiency on the state Forward exam, while growth on the state report card is a value-added measure which accounts for student demographics and prior achievement.<sup>8</sup>

<sup>8</sup> See <https://dpi.wi.gov/accountability/report-cards/about>.

**Table 13: Test participation rates by school type and subject, 2018-19 and 2020-21**

SCHOOL TYPE	ELA		MATH	
	2018-19	2020-21	2018-19	2020-21
MPS IC	97.9%	41.3%	98.1%	41.5%
MPS NIC	99.0%	82.0%	99.0%	82.1%
Independent Charter	98.6%	79.5%	98.5%	79.6%
MPS Overall	93.7%	39.5%	93.9%	39.2%
MPS Non-Charter	93.0%	33.9%	93.2%	33.5%

Source: DPI school report card data

Figure L and Table 14 show that attainment in both types of MPS charter schools (IC and NIC sites) is generally higher than MPS traditional schools and the MPS average (which may be a reflection of the district's expectation that charters perform at least as well as the district overall), and higher than the city's independent charters as well. We emphasize again, however, that attainment data are not adjusted for potential differences across school types in terms of student demographics or prior achievement. Growth data (Figure M and Table 15) tell a somewhat different story, with NIC and independent charters generally showing higher growth until 2020-21, when growth for all school types converged, likely due to the pandemic. Even so, all charter types still show slightly higher growth scores than MPS overall.

Figures N and O, and Tables 16 and 17, show changes over time in Forward proficiency rates in ELA and Math, respectively. As with attainment and growth, we generally see MPS charters outperforming traditional MPS schools, especially in Math, although proficiency declines for all schools in the pandemic year (2020-21).

Figure L: Average Attainment by School Type (ELA and Math combined), 2011-12 to 2020-21

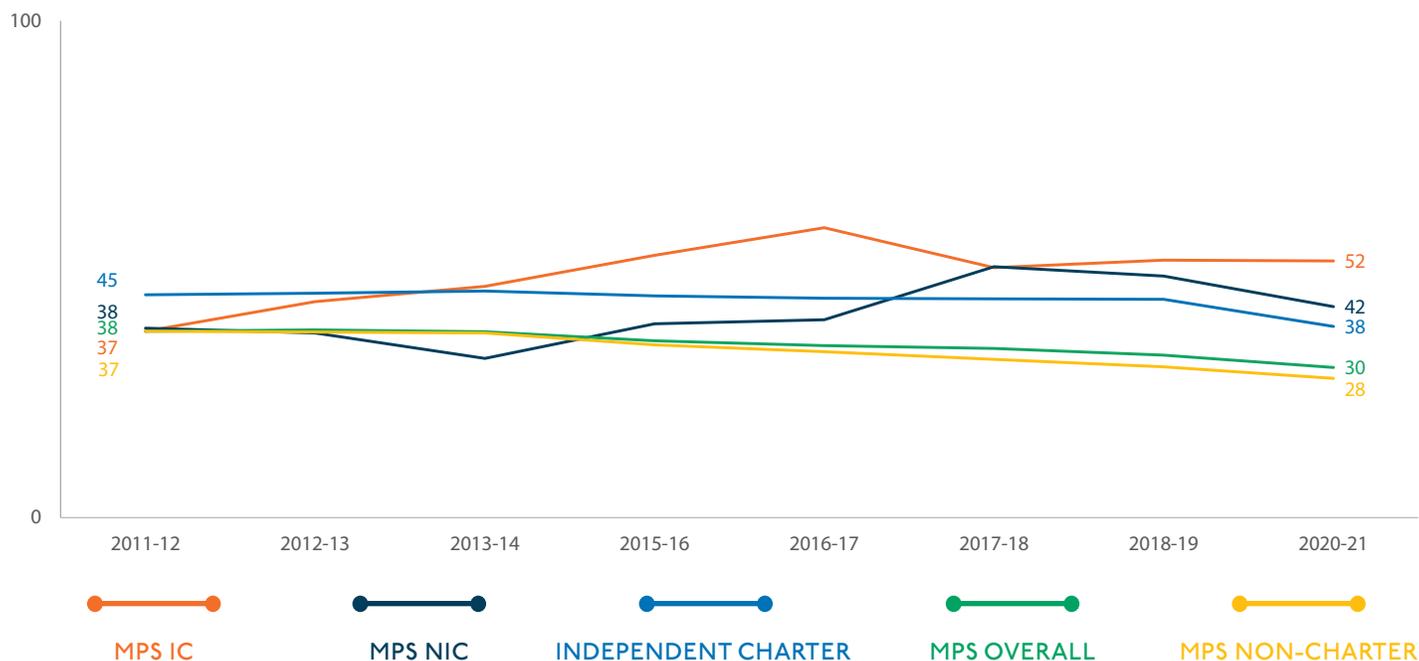


Table 14: Average Attainment by School Type (ELA and Math combined), 2011-12 to 2020-21

YEAR	MPS IC	MPS NIC	INDEPENDENT CHARTER	MPS OVERALL	MPS NON CHARTER
2011-12	37.5	38.1	44.8	37.5	37.5
2012-13	43.5	37.2	45.2	37.8	37.3
2013-14	46.6	32.0	45.6	37.4	37.2
2015-16	52.8	39.0	44.6	35.6	34.8
2016-17	58.4	39.8	44.2	34.6	33.4
2017-18	50.3	50.5	44.0	34.1	31.9
2018-19	51.8	48.6	43.9	32.7	30.3
2020-21	51.7	42.5	38.5	30.2	28.0

Source: DPI school report card data

Figure M: Average Growth by School Type (ELA and Math combined), 2011-12 to 2020-21

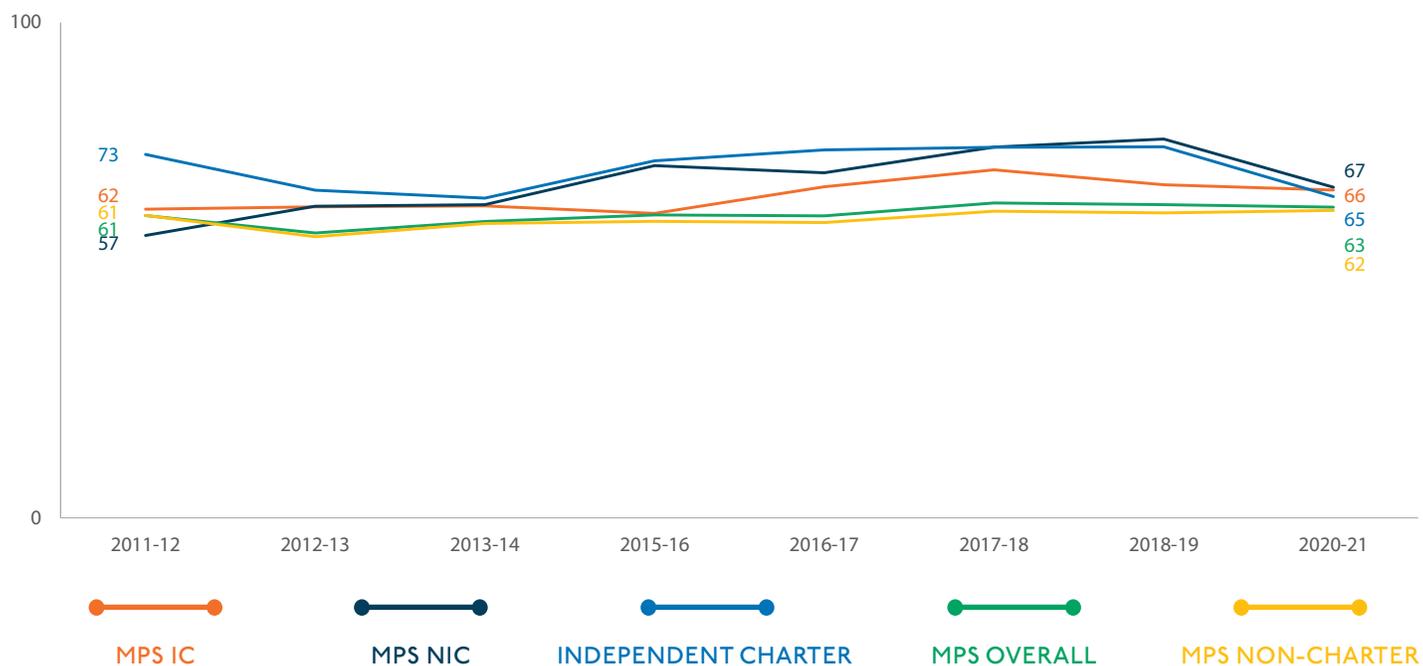


Table 15: Average Growth by School Type (ELA and Math combined), 2011-12 to 2020-21

YEAR	MPS IC	MPS NIC	INDEPENDENT CHARTER	MPS OVERALL	MPS NON CHARTER
2011-12	62.3	57.0	73.4	61.0	61.0
2012-13	62.8	62.9	66.1	57.5	56.7
2013-14	63.0	63.2	64.5	59.8	59.4
2015-16	61.5	71.1	72.1	61.1	59.9
2016-17	66.8	69.7	74.3	61.0	59.6
2017-18	70.3	74.8	74.8	63.6	61.9
2018-19	67.2	76.5	74.9	63.2	61.5
2020-21	66.2	66.7	64.9	62.7	62.0

Source: DPI school report card data

Figure N: Forward Exam ELA Proficiency by School Type, 2015-16 to 2020-21

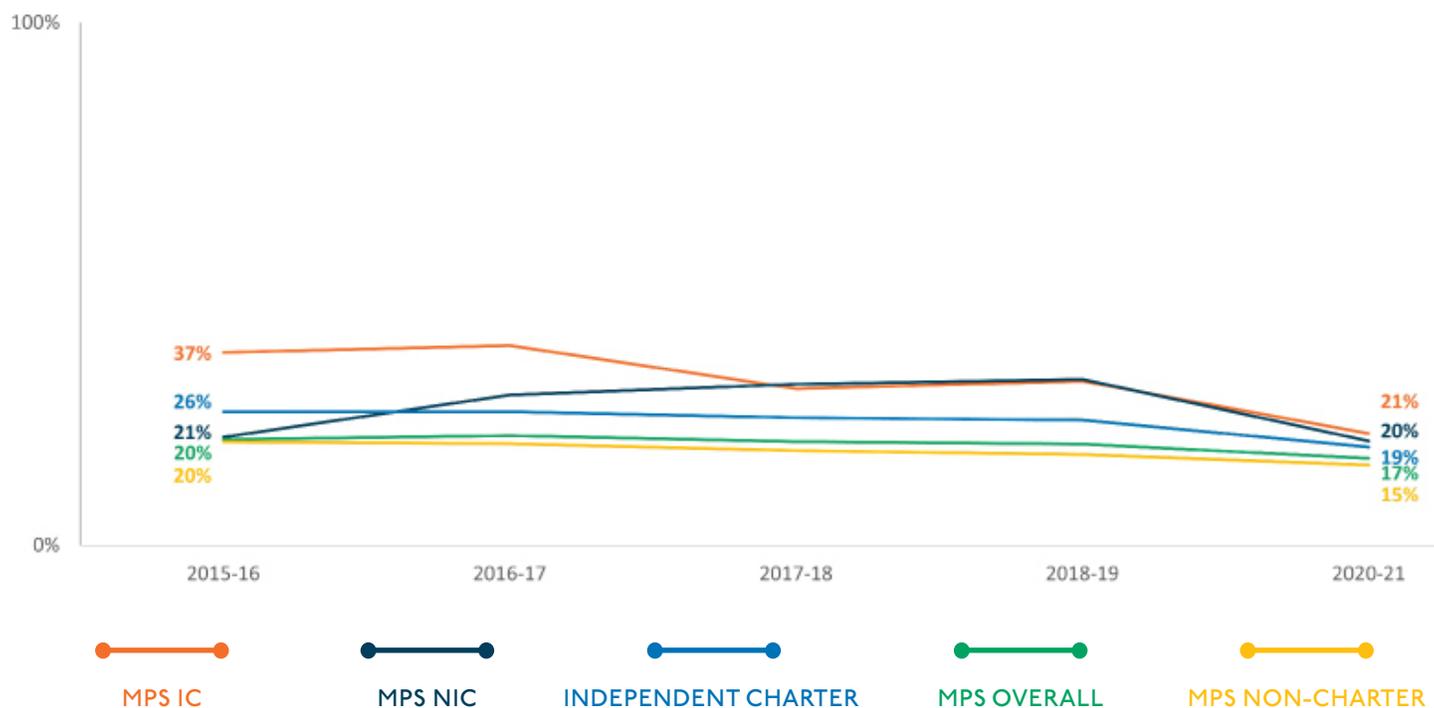


Table 16: Forward Exam ELA Proficiency by School Type, 2015-16 to 2020-21

YEAR	MPS IC	MPS NIC	INDEPENDENT CHARTER	MPS OVERALL	MPS NON-CHARTER
2015-16	36.9%	20.7%	25.5%	20.2%	19.8%
2016-17	38.2%	28.8%	25.6%	21.0%	19.4%
2017-18	29.9%	30.8%	24.4%	19.8%	18.1%
2018-19	31.4%	31.7%	23.9%	19.4%	17.3%
2020-21	21.4%	19.9%	18.8%	16.6%	15.3%

Source: DPI Forward exam data

Figure O: Forward Exam Math Proficiency by School Type, 2015-16 to 2020-21

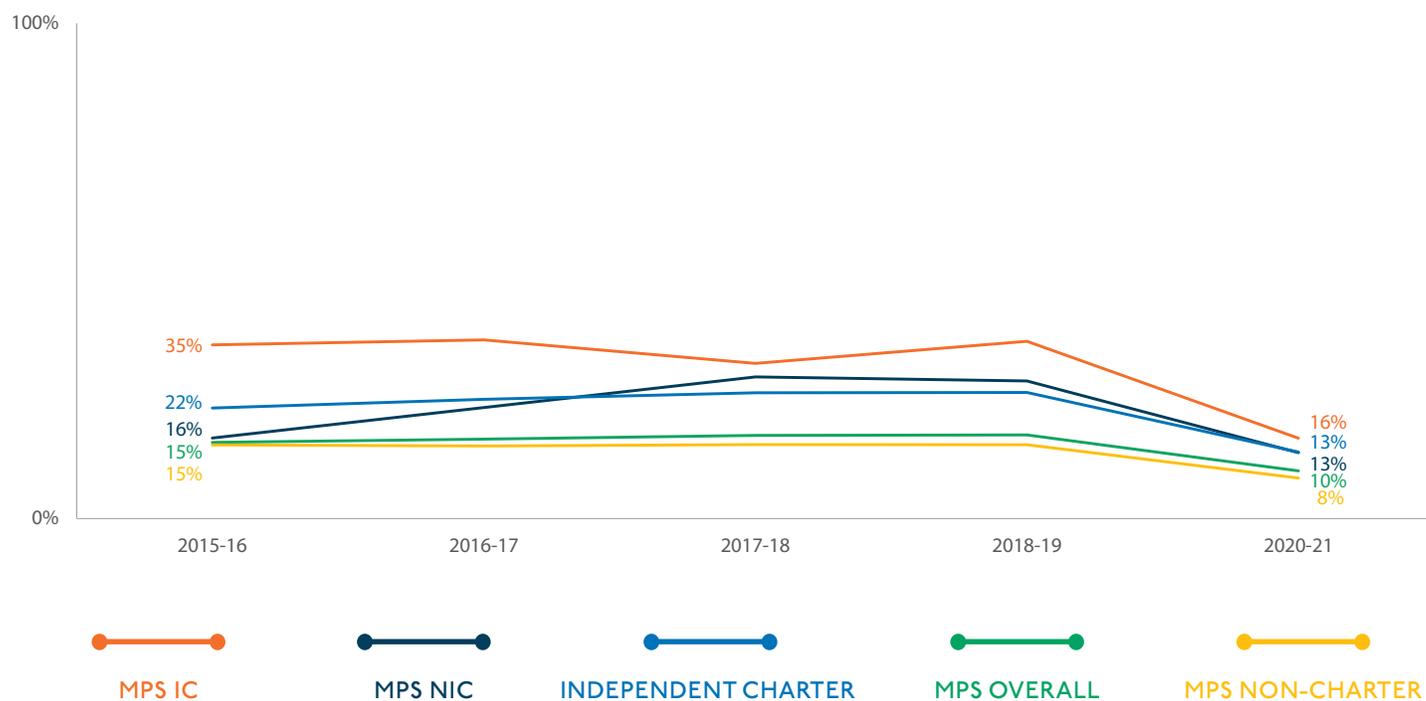


Table 17: Forward Exam Math Proficiency by School Type, 2015-16 to 2020-21

YEAR	MPS IC	MPS NIC	INDEPENDENT CHARTER	MPS OVERALL	MPS NON-CHARTER
2015-16	35.1%	16.3%	22.3%	15.4%	14.9%
2016-17	36.1%	22.4%	24.1%	16.1%	14.7%
2017-18	31.3%	28.6%	25.4%	16.8%	14.9%
2018-19	35.8%	27.8%	25.5%	16.9%	14.9%
2020-21	16.3%	13.3%	13.5%	9.7%	8.2%

Source: DPI Forward exam data

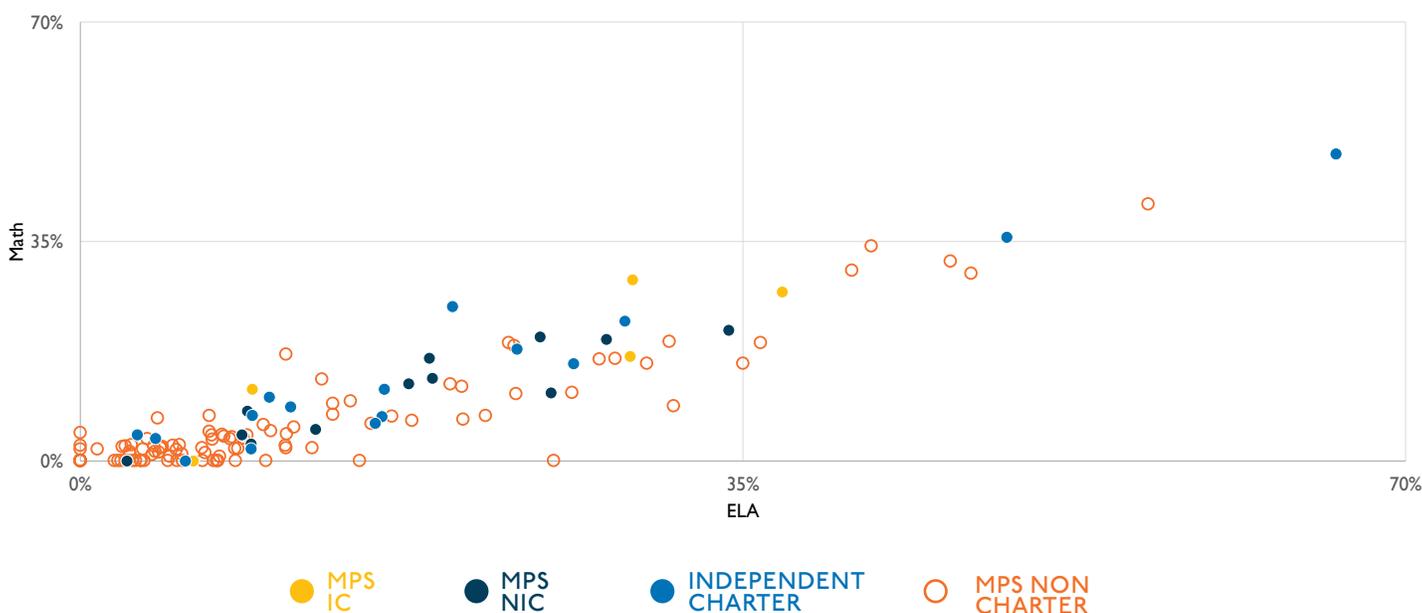
Figure P: Attainment vs. Growth by School Type, 2020-21



Source: DPI school report card data

Since average scores for any particular school type often obscure significant variation that exists within each type, especially when there are few schools of one type in a given year (for example, there were only four MPS IC schools with attainment and growth scores in 2020-21), we also reviewed data for individual schools in 2020-21, using scatterplots to show the relationship between schools' report card attainment and growth scores for ELA and Math combined (Figure P) and for ELA and math proficiency (Figure Q). Based on the report card attainment and growth data, individual charters appear to generally have stronger performance than traditional MPS school sites (i.e., a higher proportion of schools toward the upper right-hand corner of the scatterplot), though this does not appear to be the case with proficiency data.

Figure Q: Forward Exam Proficiency in ELA and Math by School Type, 2020-21



Source: DPI 2020-21 Forward exam data

**Evaluation Question 3:** What are key similarities and differences between MPS-authorized charters and those overseen by other authorizers?

**3b:** How do the programming and discipline policies of MPS charter schools compare to the policies of other authorizers?

Our interviews with other authorizers as relates to programming and discipline suggest that in general, authorizers tend to give wide latitude to charters to choose the programs they offer, but diverge when it comes to discipline. With discipline, some authorizers provide their schools with flexibility to develop their own policies (subject to complying with relevant state laws), much as they do with programming, as long as a school's discipline policy is clearly articulated in its contract and can be reviewed. Other authorizers (such as Chicago and DC PCSB) allow autonomy for discipline and interventions, but are strict about suspensions and expulsions. Denver urges charters to follow the district's discipline policy; charters can waive it, but they typically do not.

We also solicited perceptions on programming and discipline in our focus groups with MPS charter leaders. A NIC leader shared the perception that NIC sites have lower priority for at least some types of MPS programs:

“As a high school our students don't have access to [programs] first. They let everybody else apply to them, and they let our students apply at the end, even though we're all MPS students. WE Energies had an event trying to train students, some of our students were interested, we had to wait to see if there were openings. We have one student in this nursing program – that person had to wait until all other MPS students applied and wait to see if there was an opening. The last one would be... [a precol-lege program] that was started in the 2000s...that was originally given to any student in Milwaukee – now it's only with 5 MPS high schools. Our kids [in our NIC] can't even apply to this now unless they go to [one of those five] schools. But I know they're not maximizing it – those sites only have 1-2 kids. If we're trying to help all of Milwaukee get better, we should include every possible [school], especially NICs... There's this inequity that exists...It's hurting students who are supposed to be considered MPS students.”

MPS charter school leaders also shared their thinking about how they have made decisions about whether to adopt the MPS code of conduct, as opposed to developing their own policy. In a nutshell, some charters are comfortable using the district policy, while others prefer to adopt their own guidelines.

“I like [having] the backup of the district for discipline. That I'm following that procedure. That there are those certain procedures in place that I can sit down at the end of the day and be like, Mr. and Mrs. Smith, I'm following the procedure.” (IC leader)

“When we re-signed, the first time we authorized, it was mandated we follow the MPS code of contact, and the second time it was in there as well. We follow the code of conduct from MPS.” (NIC leader)

“[Discipline policies should be] tailored to the community versus the district, that's why we selected to do our own discipline and code of conduct. Prior to that, we followed the district policy and it was hard. We decided to do our own and it has really been beneficial to our community.” (NIC leader)

“We're dealing with a situation where our recommendation to MPS is not to expel a student, but MPS is trying to expel the student. It's very odd – we have our own discipline policy and that's what we're managing through right now. We want to make sure we keep the student here but they're pushing hard to expel the child.” (NIC leader)

“We do [our own discipline policy] as well, but still when it comes down to reassignment or expulsion you still have to go through the district and you're kind of at their mercy.” (NIC leader)

## Benefits and Challenges of Charter Status in MPS

**Evaluation Question 4:** How do staff in MPS charter schools (administrators and teachers) view the benefits and challenges of charter status, and to what extent do they prompt innovation?

A specific area of focus for this report is understanding how MPS charter leaders perceive the benefits and challenges of operating as charters under the district's umbrella of school offerings. We summarized above leaders' perceptions of the initial authorization (Evaluation Question 1) and renewal (Evaluation Question 2) processes, and include below their thoughts on other aspects of their operations.

### Facilities and Services

In reviewing the practices of other charter authorizers (in Milwaukee and elsewhere), we note substantial variability in terms of the types of services authorizers provide to their schools. (In interviews, we asked about several examples of services: facilities, management, professional development, contract compliance, transportation, academic resources, insurance, special education services, and technological support.) More than any specific service authorizers might have in common, **we found that authorizers tend to focus less on services and more on the authorization and renewal processes.** For example, UW-Milwaukee is "very limited in what [it] provide[s]" to its charters, and Central Michigan indicated that in general it is "not in the service business," with a few noteworthy exceptions such as a series of professional learning opportunities for charter leaders focusing on topics such as distributed leadership and how to interpret student benchmark assessment results.<sup>9</sup> DC PCSB does offer some services, but "...find[s] value in paring down support and [making] sure we're doing the authorizing well. At this time, we are not looking to ramp up support." Conversely, Denver treats its charters as part of its "family" of schools, and thus offers charters many of the same types of services provided to the district's traditional schools.

At MPS's request, we reached out to selected authorizers to learn more about their approach to co-location of charter schools within district-owned buildings that also house traditional public schools. Co-location has been a topic of interest in MPS and nationwide over the past decade, with numerous instances of charters seeking additional space to expand but often lacking the financial means to acquire facilities. One potential solution advanced by the Charter School Growth Fund and other charter advocacy organizations was co-location, and there are at least two current examples of MPS-authorized charters sharing a facility with traditional MPS schools. One of these, involving Carmen High School of Science and Technology's Southeast campus (which is co-located in the Pulaski High School building), was the topic of a previous WEC evaluation report in 2020. Below, we provide a summary of selected information on co-location based on two sources of data: interviews and email exchanges with selected authorizers and a summary of key findings from our 2020 Carmen Southeast-Pulaski co-location study.

We contacted four out-of-state authorizers (including interviews with Denver and Chicago and email responses from Indianapolis and Washington, DC) to inform the following questions regarding co-location:

1. Does [authorizer] co-locate traditional and charter schools? If so, how many (approximately)?
2. What are successes and challenges associated with co-location?
3. Have you done any studies or reports on how co-location works [with authorizer/in district]?

<sup>9</sup> See [https://www.thecenterforcharters.org/wp-content/uploads/2022/06/2022-23\\_AcademicPLO.pdf?mc\\_cid=dcf0138363&mc\\_eid=b50714909a](https://www.thecenterforcharters.org/wp-content/uploads/2022/06/2022-23_AcademicPLO.pdf?mc_cid=dcf0138363&mc_eid=b50714909a).

Indianapolis indicated that its charters do co-locate, but they have typically done so with other charters, not traditional schools. They do have a current charter-traditional co-location, but that just started in the 2022-23 school year. DC PCSB only has a “handful” of co-locations; more commonly, charters operate out of former public school facilities. Denver, by comparison, has not only stopped co-locating, but also stopped renting to charters about five years ago, although charters that were co-located before that time have been permitted to remain in district facilities. Additionally, Denver has a team dedicated to working with co-located schools on shared space agreements, ensuring that charters utilize only the parts of the buildings they are permitted to use and keep to agreed-upon arrival and dismissal schedules; as the Denver interviewee explained, “...you can’t go back and say you want more.” Chicago reports that it is developing guidelines for shared facilities based on New York City’s co-location handbook. Chicago is also working to solicit stakeholder input well before co-locations occur, asking questions such as “what do you want to protect and retain?” Chicago currently has 12 district-charter co-locations in addition to co-locations between district schools.

In terms of successes and challenges, DC PCSB noted that co-location could raise questions about charter schools’ “encroachment” on DCPS enrollment. DC PCSB also provided a link to a recent piece by Education Reform Now DC, which advocates a particular approach to co-location that involves the “host” school receiving compensation in the form of part of lease proceeds. In Denver, one success has been the ability to retain the jobs of long-term facilities staff (such as custodial and cafeteria workers), keeping them in the union, district, and community. Challenges in Denver have involved certain charter school “bad actors” trying to use more space than they were allotted, or treating employees of traditional schools as their own, as well as the need to remind traditional schools that charters are also public schools and thus should be treated and supported as such. Chicago identified a lack of equitable funding as the root of its challenges; the ability of charters to invest in capital improvements and resources such as extra teachers can cause tensions and lead to feelings of competition with their co-located traditional schools. There may also still be lingering resentments from forced co-locations and/or a sense that co-location is a prelude to closure, which could be mitigated at least somewhat by intentionally building stakeholder relationships in advance of co-locations.

Regarding MPS’s own experiences thus far with co-location, the overall goal of the Carmen-Pulaski partnership (which began in 2016-17 with 9th graders enrolling at Carmen Southeast) was to establish two high-performing high schools sharing a single building on Milwaukee’s south side, with four specific objectives related to collaboration, knowledge exchange, and improvements to school climate/culture and student performance:

1. Expanded academic opportunities for students in terms of course offerings
2. Enhanced cross-site staff collaboration and sharing of best practices
3. Establishment of a building-wide culture of college and career readiness
4. Improved student achievement

WEC’s 2020 report included the following key findings:

- Despite high initial hopes that the Carmen-Pulaski co-location would both address space issues (including Carmen’s need for space to expand and Pulaski’s declining enrollment) and provide opportunities for collaboration between students and staff, several factors worked against the partnership from its inception, including opposition from some teachers and MPS board members as well as the 2018 departure of then-MPS superintendent Darienne Driver, who had been one of the main proponents of the partnership.
- In terms of cross-school collaboration opportunities for students, Carmen and Pulaski have fielded joint sports teams, held all-school dances, and established a joint student council - but these examples have been the exception rather than the rule. This holds true for academic cross-site collaboration as well. Other than several Carmen students enrolling in Pulaski auto shop classes in the first year of the partnership, and some Pulaski students enrolling in AP Spanish at Carmen, there have been few examples of the type of academic collaboration envisioned at the time the partnership was launched. Differences in school uniform policies and the use of metal detectors were also identified as barriers to promoting greater cohesion among students from the two schools.

- Several factors were cited as having limited opportunities for student collaboration, including MPS not adhering to its pledge to cap Pulaski’s enrollment at 800 (in order to leave room for Carmen students) and the decision to switch Pulaski to an International Baccalaureate (IB) program – which made Carmen’s AP classes (a main feature of the Carmen model) less desirable to Pulaski students than they might otherwise have been.
- Opportunities for staff to collaborate have been similarly limited, for reasons that include differing schedules and expectations of teachers at each campus. Among the limited cross-site staff collaboration examples cited by Carmen leadership and staff included support staff coming together to address a behavior issue and leadership from both sites sharing best practices on a limited basis.
- Aside from a few examples, there is little evidence to suggest that the co-location experiment has improved the academic performance of students at either site (and at Pulaski in particular), at least in terms of traditional outcome measures such as test scores (including ACT and Advanced Placement), graduation rates, and student engagement and behavior.
- Overall, it is difficult to find much in the data to suggest that the co-location partnership between Carmen Southeast and Pulaski has met the goals which were envisioned. While there have been some bright spots – including stabilized enrollment at Pulaski, students from both schools playing on sports teams together and forming friendships, and limited staff collaboration at the leadership and student support level – it seems clear that the partnership has thus far fallen considerably short of its intended outcomes. Reasons for the lack of progress are complex and varied, including political opposition, leadership changes (particularly at the district level), logistical challenges (such as different bell schedules and policies), and the challenge of establishing a schoolwide culture built around college and career readiness.

Above and beyond the co-location issue, we provide below selected examples that emerged from our interviews with authorizers to highlight the range of services that different authorizers provide (or not) to their schools. We note that this is by no means an exhaustive description of all of the supports and services authorizers may offer. MPS also might be interested in Atlanta Public Schools’ “menu” of services to its charter schools, which NACSA referenced in our interview as a popular resource and which contains a list of offerings and their costs.<sup>10</sup>

### Facilities and Maintenance

- Chicago provides both the facility itself and maintenance services for approximately 40 percent of its charters; those in other buildings get a supplement for facilities
- Chicago charters can choose whether to receive custodial services, but do not receive supplemental money if they opt out
- Appleton covers the lease after the charter finds a space and provides maintenance
- Denver does not offer facilities to new applicants

### Governance, Financial, and Operational Support

- Appleton provides the same administrative services as it provides to traditional schools
- Central Michigan assists with Board governance (defining appropriate roles)
- The City of Milwaukee offers a “standard amount of support for financial services”
- Denver offers charters operational support and assistance with finance

### Transportation

- Appleton does not provide transportation to charters
- Chicago charters get the same transportation as traditional schools
- Denver charters can pay for transportation

<sup>10</sup> Atlanta Public Schools Buy-Back Services Guide, Version 7.0.

[https://drive.google.com/file/d/IDiqJY8NA5XUIBCGT\\_lSrVCUh3XMdzy5e/view](https://drive.google.com/file/d/IDiqJY8NA5XUIBCGT_lSrVCUh3XMdzy5e/view)

## Technology

- Appleton provides the same technology updates to charters as it does to traditional schools
- Chicago charters can opt into IT services

## Professional Development

- The City of Milwaukee uses PD supports from CESA I
- UW-Milwaukee has done PD around diversity, but noted that their charters “generally do their own PD”
- Chicago offers PD on special education and English Learners
- As noted above, Central Michigan provides a series of professional learning opportunities on distributed leadership and student assessments

## Special Education and English Learners

- The City of Milwaukee uses special education supports from CESA I
- Chicago has district representatives who work with school employees to provide oversight and training for special education and English Learner students
- Denver provides each school with a special education coordinator at the central office as well as multilingual education support
- DC PCSB provides special education and English Learner supports to its charters through Professional Learning Communities (PLCs)

## Support for New Schools and Schools that are Closing

- Central Michigan provides transition services for schools that are closing
- DC PCSB holds a new schools workshop for newly-authorized charters
- DC PCSB pays for family engagement specialists in the event of a closure to ensure parents are informed and enrolled in a different school for the following year

We also included a prompt for both sets of focus groups (IC and NIC leaders) around the services they have access to and/or receive from MPS. A noteworthy theme that emerged here among the NIC leaders was that they often feel like they receive lower priority compared to traditional MPS schools and IC sites in terms of services such as repairs and food service. Selected comments from MPS charter leaders are presented below.

“Sometimes renting facilities is like a secondhand cousin. Some of our engineers feel that way. That’s also a difference in expectations – we pay rent. I sign a check every month for [our site/s], but then I question if things are going to get fixed or not. Then if we try and fix it [ourselves] we get questioned, but it hasn’t been fixed for 6 months. I paid extra money to fix it but now you’re mad I fixed it?” (NIC leader)

“We have work orders for items that have been open for years. Given COVID, we thought safety of students and staff was of utmost priority – we had to contact another provider to come in to clean buildings, in addition to paying for the engineering services because of the fact that they were short-staffed...we’re the last ones to be provided services to. We’ve struggled to actually get good food, we’ve complained about expired food this year that our students have been receiving. The portions seem like elementary portions, not high school lunches.” (NIC leader)

“We have purchased filters, painted, hired cleaners, and started to install a fence for safety. Each time [we keep] getting pushback, but no support was present, which forced our hand.” (NIC leader)

“I would say that [what we need most is] more IT support services. Our systems don’t always work the way we hope. A lot of our teachers have a hard time getting in to their system because it’s a different email system, a different working system. We struggle with that over and over again, constantly calling the help desk. It’s a real challenge.” (NIC leader)

“We’re required to use MPS for background checks. There are times we’re waiting 6, 8, 10, 12 weeks. We have staff, potential teachers and other positions we’re waiting on – they clear our background checks, which are probably more intensive than MPS’s, and we wind up sitting around. We’ve been told, we have other people in front of us, and I’m pretty sure that those aren’t all charter schools in front of us, it’s probably MPS looking to take care of themselves first. For me, that’s a big problem. If we have candidates we have to react immediately, we can’t wait 4 or 6 weeks – by that time, candidates are looking somewhere else.” (NIC leader)

“Leasing the building, as a charter school, you do feel like a second-class citizen when you can’t get someone in to change a lightbulb for you, it’s not in the charter contract, it’s the lease contract. But that’s the way we’re treated, and it’s reflected in that.” (NIC leader)

“[It] doesn’t seem like sometimes they want us to do well with the supports. If our students are under the charter, that means they are MPS students. These students are getting a second-class experience too, facilities-wise or food-wise. We experience that now in my current situation.” (NIC leader)

## Service Fee and Audits

Charter leaders (from NIC sites in particular) shared thoughts and concerns related to the administrative service fee that MPS applies to their per-pupil allocation each year. Numerous leaders voiced dissatisfaction with the lower service fees which have been negotiated for some schools, and questioned whether a flat fee accurately reflected the true costs of MPS providing oversight and management services to schools that vary substantially in size. Previous reports (Chapman et al., 2018) have described in detail how MPS has tended to view the services it either provides or offers to its NIC sites as including finance, human resources, nutrition, transportation, curriculum, technology, and special education, while NIC leaders often feel like they receive minimal access to, and benefit from, these services. This is consistent with what we heard from NIC leaders in particular, several of whom called for administrative service fees to be made more transparent and perhaps attached to school performance, such that higher-performing sites could be eligible for lower fees. NIC leaders were also well aware that the administrative fees charged by UW-Milwaukee and the City of Milwaukee to its charter schools (from 1.7% to 2.5%) were generally lower than the 3% rate MPS charges them. Comments related to service fees spilled over into questions about financial audits as well, which is a separate theme addressed below.

“If we’re not getting the service at the highest level, give us the rest of the money. Others have negotiated; I don’t know if we ever tried, but this is my first year in the position. To negotiate, I have to wait 4 years to do that, but I’ve heard that other organizations have negotiated that down.” (NIC leader)

“It doesn’t cost them any more to charter with us, to deal with us, because we have [a large number of] students. They just need to be more clear on how they negotiate that fee, because it’s the larger charters that have the lower fees.” (NIC leader)

“Three percent is a percentage, being a big school or small school, we still need the same services. What’s the criteria? What’s the playing field? It changes based on different people, a different Board. If we can have more clarity in that sense – if one NIC can get 1 percent or 2 percent, everyone should be able to get 1 percent or 2 percent, because it’s a percentage, not a flat number.” (NIC leader)

“On top of the 3 percent or the fee they charge us, when they do audits, that’s extra. That’s not free.” (NIC leader)

“If you have a high-performing school that is very self-sufficient, all of your own professional staff, then there should be some ability to lower [the service fee] through sheer performance. If you were Exceeds Expectations, they knocked it down to two [percent]. There was some wiggle room in there, but it was very arbitrary...It’s a very gray area. Unless you ask, you don’t get it. To create some level of consistency, they should put some benchmarks out there. If it’s based on students, tell us it’s based on students. If it’s based on performance, tell us it’s based on performance. It’s a shell game, they want to just keep moving it around and use it as a tool for themselves. Some clarity and definitive benchmarks on how we obtain lower fees would be very helpful for us.” (NIC leader)

“[With UWM as an authorizer] you get a little more funding – they don’t charge 3 percent, they charge whatever their cost of authorizing is. The last time I heard it was 1.7 percent. It changes every year depending on what their costs are. The only benefit of chartering with MPS is you get facilities, you get universal free lunch and things like that – [you] can apply for those with a 2R, but this is easier. You get library funds, but there’s not a lot there. But it’s not worth the headaches. The hoops you have to jump through as an MPS charter are much more difficult than they are at UWM.” (NIC leader)

“There aren’t many facilities that are available for us to purchase. I think that facilities are a benefit to [our school] at this time, but it’s also a challenge. For UWM, the way that they do their oversight fee is very much determined on the true cost of oversight as opposed to a blanket at MPS that doesn’t get the true cost of their administrative responsibilities and oversight. There’s a stark difference [in the authorizing process between MPS and UWM]. There’s a lot of subjectivity with MPS that you don’t experience with UWM. There’s clear processes, and you know the outcome without it being so political.” (NIC leader)

“Speaking of audits, we have [X number of kids] and we have been audited so many times it’s not even funny. We keep having clean audits. We keep having to pay this \$14,500 for both audits at a school with [our number of students]. We’re paying the same amount that a [bigger school] pays for audit services. I wish somehow that price could be negotiated with the district but it can’t, it’s like a blanket amount.” (IC leader)

## Performance Metrics

Charter leaders also shared their views on the performance metrics that are written into the charter contracts they sign with MPS. In particular, we were interested in whether leaders felt that the standard goal of beating the district average was appropriate and meaningful. Leaders indicated that they often hold themselves accountable for indicators other than what is stated in their charter contract, and raised concerns about other issues such as test participation rates and the possibility of tying goal attainment explicitly to length of charter renewal. Selected quotes from charter leaders are again offered as illustrative examples of key points that emerged from focus groups.

“On the state report card, where growth measures are taken into account and it’s more of a state-wide average versus the district – that’s more where we look. We don’t look at beating the district average... We don’t worry much about the PAAR report because the standards aren’t very high.”

“One thing I would add in terms of the PAAR report and the district average, the way it’s determined, all the NICs are included in the numerator and denominator. That never has made sense to me. If it’s a district average, it should be looking at the traditional schools in comparison to the NICs.”

“I would love if there were stretch goals that you could put in [to our charter contract] that trumped politics. If we hit these stretch goals or these metrics, we’d have more say on things we want. I would love if we could add something like, here’s another value-added we can get if we hit this metric. Whatever...result we want. That could be an additional 5-year charter, without a vote. Or say we’re self-sufficient, we’re not using as much of that administrative stuff so that percentage goes down.”

“...When COVID first hit, our testing participation was still 95-97 percent. The district average, including NICs, was 34 percent. Then you’re not doing apples to apples at all because of the stark difference in terms of participation. When we’re being held accountable to standards and to performance, there has to be a threshold met by MPS in order for us to even be compared.”

## Tradeoffs of Charter Status

A final prompt for all focus groups with charter school leaders asked them to reflect on the tradeoffs associated with operating under charter status with MPS. This prompt did not explicitly frame the “compared to what?” question – that is, leaders could (and did) interpret this as a question of either “compared to operating as a traditional MPS school” and/or “compared to operating as an independent charter authorized by either the City of Milwaukee or UW-Milwaukee.”

Charter leaders as a group, many of whom have worked with or for MPS for years, had much to say in terms of the tradeoffs of operating under charter status. In most cases, it was clear on the one hand that they had at least somewhat of a continued sense of allegiance and affinity to the district, and clearly perceive a set of benefits associated with operating as charters under the district umbrella. These benefits include, to varying degrees, having their own governing board, the ability to procure facilities and services (such as professional learning opportunities for teachers) from MPS on an as-needed basis, the availability of certain funding streams, and (in the case of NICs) the ability to select their own curriculum and hire their own staff.

At the same time, it is equally clear that charter leaders, to varying degrees, continually weigh the benefits of operating as charters, and question in some cases whether the benefits exceed the challenges. Areas of particular frustration include a perceived lack of support for charters on the part of some MPS board members and the perception that working with other potential authorizers would be a more transparent and predictable process. We present below selected quotes from MPS charter leaders (both NIC and IC) that illustrate some of the complexities and considerations they perceive.

## Compared to Other Types of Charters or Authorizers

“We would all, I think, prefer the NIC status...the only difference between an instrumentality charter and a NIC is that even though the referendum was sold as something that would benefit all MPS students, and our students are MPS students, but we don’t get a dime of that referendum money. ICs do.” (NIC leader)

“We couldn’t fulfill our mission if we were an instrumentality charter school. I want to paint a very clear picture. Two years ago, when we had to pivot to shutting down schools [due to COVID], many of us [charter school leaders] were able to almost immediately pivot to virtual learning, within 48 hours. I know the district didn’t go into remote learning until sometime in May. The flexibility, the ability to meet the needs of students and unique communities, would be at risk if we were an instrumentality charter school.” (NIC leader)

“I prefer being an instrumentality, my families prefer it. Not that they’re pro-union, but the teachers all hold their licenses, they’re part of MTEA, the pay is set, there’s no squabbling with that. As I’ve grown in the district, I’ve received more and more support. It was difficult in the beginning – told to leave this meeting, told to leave that meeting. That no longer happens to me. We have shrunk in size, the instrumentalities. I would never want to be an NIC. That would be too hard for me as a leader. I like the backup of the district for discipline. That I’m following that procedure. That there are those certain procedures in place that I can sit down at the end of the day and be like, Mr. and Mrs. Smith, I’m following the procedure.” (IC leader)

“There are times, though, that I would like to be an NIC. I was not a charter person until I became an instrumentality charter. I like some of the benefits that come with it. It’s just been such a challenge obtaining some of those benefits. And helping to educate others concerning those benefits. It took me until this year to understand that I have a governance board that can make decisions. I have an awesome governing board. Really utilizing them in the interest of staff and students, I’m just now understanding. That, to me, is the advantage of being an IC. I don’t want the full responsibility of the non-instrumentality charter. It’s good to be part of an establishment sometimes, for certain pieces.” (IC leader)

### Facilities and Services

“The only advantage to being a non-instrumentality charter, from my perspective, is additional resources that the district can offer you. For many people, that’s facilities. You can only lease MPS buildings if you’re a non-instrumentality charter. For schools... that own their own buildings, the only advantages are fiscal because they get \$2500 more per student in state and local taxes. [Another reason we] stuck around was because the ESSER funding was more beneficial for our students through MPS than becoming a 2R charter. Other than that, the amount of hoops you have to jump through as an MPS charter vs. a 2R charter are night and day different. If it weren’t for the finances or facilities, I can’t imagine why someone would charter through MPS instead of UWM or City of Milwaukee.” (NIC leader)

“The only other benefit for us is having that special education connection. We have a special ed supervisor that we work with that is here a couple of days a week to support our SpEd teachers. Also getting contracted services, if we need, for example, a hearing specialist. Something like that we can contract with [MPS] or pay a fee to get those services...I don’t see any other benefit. Not because of administration – the NIC team we work with. But the uncertainty every time we go for contract renewal.” (NIC leader)

“I like the partnership with MPS. I think the pros outweigh the cons, but that’s what I consider a power play. There are some facilities that MPS owns that aren’t being used. We should just [be able to] buy it – let us buy it so we have permanency for our families. Families have questions like “are they going to renew your contract? Are they going to renew your lease agreement?” That builds this sense of abandonment that can occur.” (NIC leader)

“For me, [the big advantage is] the professional development opportunity. The district is chipping away more and more at the time that principals have with staff to coach and provide PD. We’re allowed a half-day. We use that PD to grow best practice in terms of instruction, in terms of assessment for our scholars. You will not have that as a traditional school.” (IC leader)

### Autonomy and Governance

“Having the ability to hire own staff is beneficial for our students and our school community.” (NIC leader)

“Having our own governing board as well is an advantage. We can stay nimble and flexible as charter schools with our own governing board.” (NIC leader)

“[An advantage for us is]...being able to turn on a dime. We made a decision to buy new curriculum. We don’t have to run it through a curriculum Board or wait on a cycle for someone else’s curriculum cycle. We just buy the curriculum that we think fits our students’ needs when we need to buy it. I think there is a lot of advantages to being a non-instrumentality, but still having the services and benefits of a larger district. They encourage us to take advantage of those professional development opportunities, teacher instructional elements [such as] all day PDs for teachers. We’re not excluded from those types of things. For me, it benefits more to be a non-instrumentality charter than to be a traditional MPS school, to be in lockstep with what the district thinks needs to be done. We have more stability that way.” (NIC leader)

“Charters were started 30 years ago to be innovative and something different. Having the autonomy to choose own model, having the autonomy to be our own governance structure, the autonomy to be flexible and nimble based on our community needs, allows us to be innovative. We saw that with COVID – many of my colleagues [NIC leaders] were able to pivot and be flexible. I know that MPS didn’t provide even the virtual platform until sometime in late May in that first year of COVID in 2020, when many of my colleagues almost literally overnight provided a virtual experience for our students and families. It would be incredibly challenging to be a traditional public school and try to deliver on our sacred promise to our children and families and deliver innovation. I don’t think we could actually.” (NIC leader)

“We would not be able to deliver on our promise to our families and community if our governing board was the MPS governing board. I want that to be super clear in this conversation and to the feedback that is provided to the MPS Board of governance...I simply believe that we wouldn’t be able to have the success that we do if the MPS was our governing board.” (NIC leader)

“For me, it’s the autonomy. I’ll couple that with we are a public school, but we run privately, we’re privately run and that’s the beauty of an NIC. We have the autonomy to hire our own staff, adopt own curriculum, and create a community that serves the population we serve.” (NIC leader)

“The beauty of being innovative is having our own governance, that’s the beauty of being a public charter school that is privately run. So that we can truly serve the population that our charter says. I cannot speak enough about autonomy and having our own governance to manage the school, it’s a game-changer for us...we would not be able to be a high-performing school if we were under the governance of MPS.” (NIC leader)

“Our charter is a parent-involved, parent-run school. Our board is made up of our parents. We couldn’t do this if MPS was our governing board.” (NIC leader)

“The innovation comes from us being able to respond quickly to things we see. They say there’s a problem or their kids are struggling and we’re able to quickly move on that. We wouldn’t be able to pivot as effectively if we had to go through the Board because we would have to go through all the other people.” (NIC leader)

### Relationship with MPS and the Value of Charters to the District

“There is a lot of value that we bring to MPS and city that the MPS Board do not recognize/realize. We need the MPS Board to recognize the value added and [us as] partners. We care deeply about having quality school options for our families in our city.” (NIC leader)

“If we were governed by the MPS board, there are folks against NICs on that board. Living in the vacuum that we are now, it’s unfathomable to think we’d have the support, guidance of folks that were in some cases elected and asked questions about their support of non-instrumentalities. That question [about the advantages of being a NIC] is almost impossible to answer in the ways the Board is elected. That can’t be understated. It would be catastrophic if overnight, all of a sudden, the NICs were governed by the MPS Board as it is currently constructed.” (NIC leader)

“...there is a ton of value that we bring to MPS and to our district. That is reflected in what we provide, in what our families are saying in terms of the quality of education we provide. That is reflected in interviews with students about their experiences. Not just when they’re with us, but when they leave us and become incredibly productive members of our society. These are the leaders that we’re preparing for the future. And we care deeply about having high-quality school options for our families. The Board as it currently stands right now, sees us as a threat, they don’t see us as partners. This job is so incredibly hard to begin with – you add the complexities of COVID, and it’s exponentially harder to navigate. And then to have an authorizer that creates all this red tape, that takes us away from the work we need to prioritize, it makes it really hard to want to continue to be authorized by an entity that sees us not as partners, but as a threat, that wants to eliminate us entirely.” (NIC leader)

“For us, it’s programming...our program is very unique. Our charter contract allows us to have that unique structure. It’s very important. To go back to your question about what the district offers...this has improved, I don’t feel like we have to fight for things as much. We get specialists assigned, it has gotten much better. In the beginning, we were on different lists. That has gotten better in the past [several] years, now they just know.” (IC leader)

“The lack of knowledge that the [Regional Superintendents] understand when it comes to charter schools ends up being a challenge as well. Differentiating us from traditional schools, that’s been a challenge – I think there have been too many conversations around ‘I’m a charter, I’m not held accountable for some of these same measures.’” (IC leader)

## Perceptions of Specific MPS Departments and Staff

Charter leaders’ comments about the tradeoffs of operating under charter status also surfaced perceptions about specific departments. A sampling of these comments, including the numerous charter leaders who praised their working relationship with Bridget Schock and the Department of Contracted School Services, follows:

“Some of the people at MPS have been absolutely phenomenal to work with, beginning with the NIC office. [The Director of Assessment]...the new school board [President] – even though philosophically he’s not 100% aligned with charters, he’s at least reasonable and willing to talk. [The Legislative Policy Manager] has been fantastic in terms of trying to work with us all together to try to get an increase in funding at the legislative level. There are a number of people within the district that have been fantastic advocates and support people. I just didn’t want to not put that out there. It’s easy to gripe about all the things that are going wrong as a NIC, but there are a lot of things that are going very well.” (NIC leader)

“I can say that I had a lot of support from the charter office and from staff who was here from the beginning.” (NIC leader)

“The biggest pushback we receive is from curriculum and instruction. Not every department knows what instrumentality charters can and cannot do. You just have to work with them.” (IC leader)

## Need for Onboarding and Training

As charter leaders were sharing their perceptions around operating under charter status, several noted that it would be beneficial to have more opportunities to network with their colleagues. They currently meet as a group (IC and NIC leaders, separately) with the Department of Contracted School Services several times each year and find these gatherings to be helpful. They also suggested, however, that it would be beneficial to perhaps have a couple additional meetings each year dedicated to specific topics of common interest (such as financial audits), and to develop both a short training for new leaders (e.g., what you need to know as a new IC or NIC leader) and an informal mentoring system, in which a new leader is paired with a veteran that they can call on for questions and guidance as needed. Specific comments to this effect included the following:

“Being at a charter school, it’s a whole different world. No one told me what privileges I had or didn’t have. I had to run it how I’m used to running a traditional school. I had to learn some things – trial and error. No one walked me through it, no one told me anything. It’s when you didn’t do something you get the “oh, you should’ve done [this], you should’ve known...” No, I didn’t know, no one told me. Thank God I know how to swim, because I was thrown into the ocean. I survived, but it was not because of support. There are still some things teachers know that I don’t know.” (IC leader)

“Back in the day, we used to have charter school meetings. During the leadership institute. ICs, we had more back then, we would meet. We went through compliance issues, we talked about what we can or cannot do, those meetings were very helpful. I don’t know where they went, maybe because we’re not as large of a group anymore. But for new leaders, I think that would be very helpful. And also, leadership should know...[to] not throw a principal without charter experience into a charter school.” (IC leader)

“I wasn’t aware of [all] the additional perks. For example, charter schools can carry over all funding that is left over from the previous year. I wasn’t aware of that until I got a call that explained this to me. Traditional schools can carry over a maximum of \$5000; charter schools can carry over all of the funding. I think that one of the things that should come back to us is that if we’ve had vacancies for an entire year and we put that funding aside for additional teachers, that money should come back to us. If we have a shortfall for next year, we can cover that.” (IC leader)

“They need to come up with a guidebook. If the Board is involved and approves, then it doesn’t matter who comes and goes, it’s up to the Board to have a guide.” (IC leader)

“If they put anyone [school leaders] into a charter school, they need to walk them through, sit down and have a conversation, let them know their expectations, the challenges they will face. Not just throw somebody in, and you find out as you swim what’s to be expected. And even decide, is this something you want to take on?” (IC leader)

## District-Required Documentation

Several IC leaders also noted their frustration with what they view as time-consuming and duplicative requirements around specific forms they are required to submit each year:

“The double work, there has to be a way to make some of these things more concise. When you have a 50-page SIP, that’s a problem. You can still meet your contract requirements without documenting 50 pages of it. It’s unreal.”

“It’s not because I know everything or know better, but our work should speak for itself. And 50 pages [for the SIP] versus 5 pages – if I can give you the information in 5 pages, the 50 pages is ridiculous.”

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## Section 4

# Conclusion & Recommendations

## Conclusion

Charter schools have clearly represented an important part of MPS's portfolio of school offerings for more than two decades. Based on our targeted review of selected issues of interest identified by the MPS Board of School Directors, we offer the following summary of key points.

With respect to the *initial authorizing and approval practices* used by MPS and selected authorizers (**Question 1**), we conclude that MPS's practices and policies are largely consistent with what other authorizers in Milwaukee, elsewhere in Wisconsin, and in selected urban areas around the country do, and are in line with recommendations and guidelines established by the National Association of Charter School Authorizers (NACSA). MPS has a Charter School Application Guidebook available on its website that clearly describes the different types of charters authorized by the district, the process and timeline for applying for a charter, and the required components of the application itself (including the mission/vision, governance, educational program to be offered, and plans for staffing and facilities). Contract templates for both instrumentality and non-instrumentality sites are reviewed regularly, and the district publishes both an annual report of all of its charters as well as a Pupil Academic Achievement Report (PAAR) for each site. A review panel convened by the district (which includes board members, administrative staff, and community members) uses an application checklist and rating rubric to assess applications, and the MPS Board of Directors makes decisions on charter authorization (for both new and existing schools) at public meetings. Leaders of current MPS charters (both instrumentality and non-instrumentality sites) expressed relatively few concerns about the initial authorization process (and praised the supports provided by the Department of Contracted School Services), although they did suggest that it would be helpful to develop an informal mentoring program for newly-authorized charters, in which a new school leader is paired with a veteran leader of the same school type (instrumentality or non-instrumentality) to consult about policies, requirements, and flexibilities.

Regarding the process MPS uses for *reviewing and renewing charter contracts* with its schools (**Question 2**), our findings are more complex and varied. On paper, the process that MPS uses seems mostly consistent with the guidelines and practices used by other authorizers, as well as in alignment with principles of good practice as recommended by NACSA. By this, we mean that the evaluation and monitoring of MPS charters as they approach renewal decisions is based on a rubric built around three broad areas (educational performance, financial performance, and organizational performance) that is reviewed by a panel in accordance with a set of criteria that are generally similar to what other authorizers use, results from annual audits and performance reports are considered, and a public hearing is held. MPS does have shorter-term renewals (with the longest being five years) compared to at least some other authorizers (several of which have 7-year, 10-year, and even 15-year renewal options), although we note that some authorizers also have five-year renewals as their longest option.

Where MPS's review and renewal process appears to differ somewhat from at least some other authorizers, however, is in the perceptions of MPS charter school leaders that there is a persistent and perhaps growing disconnect between the district's review/renewal process as *stated on paper* and the process as it *actually occurs*. In other words, many (although clearly not all) MPS charter leaders - particularly at NIC sites, although also at some IC sites - described how their experience with the renewal process has been inconsistent, politicized, subjective, and frustrating. Numerous leaders indicated that they had met of the performance metrics stated in their contract, and went into their renewal meeting with the MPS board of directors expecting a full (five-year) renewal, only to be asked questions they did not expect, and that they perceived as largely unrelated to their school's actual performance. In some cases, renewals were granted for less time than expected, which charter leaders indicated had created uncertainty among their families about whether to re-enroll their children. In general, charter leaders expressed a desire for a clear and transparent renewal process, in which meeting pre-defined performance measures (beating the district average, in most cases) and passing all relevant financial audits would result in automatic renewal.

We also note that some charter leaders indicated that uncertainty about the MPS renewal process had led them to consider moving to other authorizers (UW-Milwaukee and/or the City of Milwaukee), where they perceive the renewal process to be more straightforward and objective. While we did not speak directly with leaders of any charter schools overseen by other authorizers about their experience with the renewal process, we did speak with staff from other authorizers, who described a minimal degree of disconnect between how the review/renewal process works on paper versus how it actually occurs in practice.

In terms of *key characteristics of MPS-authorized charters, and how they compare to charters overseen by other authorizers (Question 3)*, we note that despite the district having far fewer charters numerically in 2021-22 (n=19) compared to the high-water mark of 44 in 2008-09, the “market share” of charters (defined as the percentage of the district’s total enrollment attending all types of charters) stood at 13.9% in 2021-22, down only slightly from a high of 15.7% market share in 2011-12. The district’s lineup of charter schools has become increasingly skewed toward NICs in recent years, reflecting a gradual reversal of a trend that started in the late 1990s and early 2000s with an IC-heavy focus.

A look at selected student demographics shows that MPS charters overall enroll a somewhat lower share of low-income and special education students than do the district’s non-charter sites (and the district overall), although this is more the case for NIC sites than IC sites. IC sites collectively (which include ALBA) enroll a proportionately higher share of English Learner and Hispanic/Latinx students, while NIC sites collectively enroll a higher share of Asian and Pacific Islander students, which is largely attributable to HAPA. The student demographics of MPS’s IC and NIC sites resemble those of the charters authorized by UW-Milwaukee and the City of Milwaukee in several ways, such as the percentage of enrollment consisting of students of color, although there are several noteworthy differences in terms of student demographics between the two non-MPS authorizers as well, including City of Milwaukee charters’ large percentage-wise enrollment of Black students and UWM charters’ proportionately large share of Hispanic/Latinx students.

At the request of MPS, we also included in this report a descriptive comparison of selected measures of student engagement and academic performance across MPS charter types, in relation to both the district overall and to charters overseen by other authorizers in Milwaukee (UWM and the City of Milwaukee). As noted previously, we caveat these comparisons by emphasizing that the student engagement and performance data are not adjusted statistically for potential differences in student demographics or prior achievement that may influence outcomes. Our goal, in other words, was not an attempt to show that MPS-authorized charters as a group (nor individually) are performing better or worse than might be expected given their student populations, but rather a descriptive profile of a few key measures of engagement and performance over time. We note from these data that both types of MPS charters (IC and NIC sites) have had higher attendance rates and lower suspension rates than MPS non-charters and the district overall in recent years, as well as higher attainment and growth scores on the state report card and higher rates of both English Language Arts (ELA) and Math proficiency on the state Forward exam. Selected measures of high school students’ performance are limited by the small number of MPS charters (particularly IC sites) that enroll high school students, although we note that MPS NIC sites have comparatively high rates of AP course-taking and postsecondary enrollment.

MPS charters differ widely in terms of their educational mission and programming, which provides a clear benefit to families within the district in terms of creating a range of options that include schools with a particular linguistic or cultural focus and/or a specific curricular approach such as project-based learning. In terms of disciplinary policies, MPS charters have the autonomy to adopt their own or use the district’s existing code of conduct, and there are examples of each. Charter leaders who indicated that they adhere to the district’s policy cited familiarity as a primary motivation, while leaders who have developed their own code of conduct cited the ability to customize their policies to the needs of their students as the main factor in their decision.

As to the issue of *how MPS charter leaders view the benefits and challenges of charter status, and the extent to which they promote innovation* (**Question 4**), a complex set of perceptions again emerges. On the one hand, charter leaders clearly appreciate some of the key benefits of operating as charters under the MPS umbrella, such as the ability to have their own governing body, select their own curriculum, establish their own disciplinary policy, and (in the case of NIC sites) hire their own staff. Charter leaders also cited the ability to pivot quickly to virtual instruction under COVID as a major advantage. They take great pride in the diverse array of educational offerings they make available to MPS families, and cite these (quite justifiably) as examples of charter-led innovation occurring within the district that has likely helped to keep many families within MPS during a decades-long decline in the district's overall enrollment. MPS charters, and IC sites in particular, also take advantage to varying degrees of services that the district makes available to them, including facilities, technology, transportation, food service, learning support for special education and English Learner students, and professional learning opportunities for school leaders and staff. MPS as a charter authorizer, in fact, seems to provide a wider range of services to its schools (particularly IC sites) than many other authorizers, who tend to focus more on the approval and renewal processes.

MPS charter leaders were also clear, however, in their perceptions around a set of challenges associated with operating under charter status. First and foremost on this list, as described above, is the widely-held perception that the renewal process is arbitrary, inconsistent, and politicized, and that renewals in recent years have become more challenging (and for fewer years) despite charters having met their performance benchmarks - at a time when some of the district's lowest-performing traditional schools seem to receive no such scrutiny. Charter leaders (of NIC sites in particular) also expressed frustration about the

extensive and redundant documentation they are required to submit (such as lengthy school improvement plans), as well as with the services they receive from MPS, with unmet work orders for building repairs and long waits for the district to complete background checks for hiring staff as common examples. Uncertainty and frustration also exist regarding the administrative service fee that charters are assessed, with the perception that lower fees can sometimes be negotiated with the district and that fees are lower with other authorizers.

More broadly, a significant number of charter leaders express doubt about MPS's long-term commitment to charters as part of the district's portfolio of school offerings, and continue in some cases to wonder openly about whether they would be better able to fulfill their mission under a different authorizer. Some charter leaders clearly feel that the Board of Directors does not fully understand or appreciate the contributions and value their schools bring to the district and its families, and that they are increasingly viewed as a threat rather than as true partners. We emphasize here that these are not necessarily the perceptions of all charter leaders, but at the same time it would not be accurate to understand these concerns and frustrations as the views of one or two leaders, as it was clear that they were shared to at least some extent by most of the leaders we spoke with. It seems useful, in light of these findings, for MPS to reflect on the strategic value of continuing to have charter schools as part of its portfolio of offerings to families, and to investigate ways to address (or, at a minimum, acknowledge) at least some of their concerns.

## Recommendations

Given these concerns and as a result of our findings, we make the following recommendations to the MPS Board of Directors:

1. Refine the review and renewal process to make it more transparent, perhaps in partnership with charter leaders. This process need not only include performance measures and could be more holistic, but charters require clearer expectations for both their future plans and their relationships with families.
2. Consider the level of service provision the district offers its charters by reviewing other authorizers' philosophies and offerings. If the district cannot provide certain services (at all or in a timely manner), that needs to be communicated clearly to charters.
3. Engage with charter leaders on novel and effective practices that might benefit traditional schools, drawing on charters' abilities to be nimble and innovative. Such activities might help bolster the partnership between MPS and its charters to the ultimate benefit of all of MPS's students and families. The Board could leverage charters' positive relationships with the Department of Contracted School Services in such an effort, but the Board should also participate in this work to an extent to bridge the perceived Board-charter divides we have identified.
4. Designate a committee, workgroup, or individual, in collaboration with stakeholders from traditional and charter schools, to develop guidelines for co-location informed by the successes and challenges experienced by MPS and other authorizers.

Drawn from the perceptions of IC and NIC leaders as shared during focus groups, the following recommendations are also offered, divided into separate lists for IC and NIC sites.

### IC Recommendations:

- Training/Networking/Mentoring/Guidance:
  - Consider ways of providing training for new IC charter leaders on procedures, requirements, flexibilities associated with IC status. Several leaders remarked that this type of training (perhaps accompanied by an IC leaders' guidebook or procedure manual) would be very helpful.
  - Develop an informal mentoring program for IC leaders, in which new leaders are paired with a more veteran colleague who has familiarity with policies and procedures.
  - Create more frequent opportunities for IC leaders to network as a group – they report that their periodic (quarterly?) meetings are helpful, and despite being very busy, they appreciate these opportunities to network with and learn from their colleagues.
  - Provide clear guidelines to IC leaders on district policies regarding financial carryover from year to year, as several leaders were not clear on what's allowed.
  - Provide basic training for relevant MPS central office staff (curriculum, Special Education, regional supervisors, etc.) on different types of charters and what they mean in terms of flexibilities. Several IC leaders expressed frustration at needing to remind district staff on occasion (particularly when turnover occurs) on what charters are/are not allowed to do.

- District Policies and Procedures:
  - Make sure all relevant district forms are kept updated with current lists of all schools in the district, as several IC leaders recounted how their school didn't appear on drop-down lists for some district forms and applications.
  - Review district requirements regarding financial auditing for IC charters, and ensure that requirements are clear to school leaders. If/where it is necessary to charge schools the same fee for financial audits regardless of school size, make clear why that is the case, since several IC leaders indicated that this seems somewhat arbitrary and perhaps unfair.
  - Provide networking opportunities around hiring of external auditors – this could be as simple as a running list of external auditors (without any implied endorsement by MPS) of auditors that IC leaders have used in the past.
  - Investigate ways to consolidate or combine submission of required documents: several IC leaders noted their frustration with being required to submit lengthy documents such as school improvement plans that they view as redundant with other required documentation that involves the same information.
  - Consider developing (and publicizing) opportunities for greater flexibility around attendance, for instances such as when transportation options aren't available (buses do not show up, drivers quit, etc.) and/or students can't physically be in attendance at school. IC leaders realize that MPS is subject to DPI regulations in this regard, but would appreciate any options for greater flexibility in this area.

### NIC Recommendations:

- Provide new board members with a brief written summary/overview of different types of charter schools and how they're different from/similar to each other and traditional MPS schools. This information is obviously available already (on the MPS and DPI websites), but NIC leaders indicated that a brief summary (perhaps in table format) would be helpful as well.
- Clarify how work orders and IT services for NIC sites are handled and prioritized, in order to address the perception among NIC leaders that their schools consistently receive lower priority despite serving MPS students.
- Clarify which opportunities for students (including, but not limited to, job training and scholarships) are available to students at NIC sites concurrently with other (non-charter) sites, and which opportunities NIC students receive lower priority for (and why).

We are cognizant that this report does not include any perceptions from MPS Board members themselves. We would welcome their perspectives, either as a response to this report or an addition.

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## Section 4

# Links and Resources

## Links and Resources

### Authorization

Central Michigan University New School Development Resources (includes application form and guidebook for prospective new charter schools): <https://www.thecenterforcharters.org/resource-center/new-schools/resources/>

Chicago Public Schools Request for Proposals for New Charter and Contract Schools: <https://www.cps.edu/about/non-district-school-management/2022-request-for-proposal-to-open-a-new-school/>

Denver Public Schools application: [https://docs.google.com/document/d/1kkXDTOFPuaT-Jbh\\_qtPtISorPmoUNcqNv878tVLccLY/edit](https://docs.google.com/document/d/1kkXDTOFPuaT-Jbh_qtPtISorPmoUNcqNv878tVLccLY/edit)

Denver Public Schools application hub: <https://portfolio.dpsk12.org/application-hub/>

DC Public Charter School Board 2021 New School Charter Application Guidelines: <https://dcpcsb.egnyte.com/dl/zITA8DIbim>

Note on DC Public Charter School Board website about the pause in accepting applications in 2022: <https://dcpcsb.org/start-charter-school>

University of Wisconsin-Milwaukee charter school application process overview and documents: <https://uwm.edu/education/charter-schools/application-process/>

### Renewal

Central Michigan University Reauthorization Template and Checklist: <https://www.thecenterforcharters.org/charter-contract-development/>

Denver Public Schools charter school closures: <https://portfolio.dpsk12.org/school-closure/>

DC Public Charter School Board Review Guidelines: <https://dcpcsb.egnyte.com/dl/USVpcnkOkR>

DC Public Charter School Board Renewal Guidelines: <https://dcpcsb.egnyte.com/dl/gyZeNWlxtS>

NACSA blog post on renewal and data during the COVID-19 pandemic: <https://www.qualitycharters.org/2020/09/guidance-for-charter-school-authorizers-to-ensure-accountability-in-a-time-of-transition/>

University of Wisconsin-Milwaukee charter school renewal term guidelines and dissolution: <https://uwm.edu/education/charter-schools/renewal-term-guidelines-dissolution/>

## School Reports/Scorecards

Chicago Public Schools Example Financial and Compliance Performance Report: <https://schoolreports.cps.edu/FY18FinancialAndComplianceScorecard/400081%20Acero%20de%20las%20Casas%20FY18%20Scorecard.pdf>

Denver Public Schools School Quality Framework: [https://drive.google.com/file/d/ls\\_w7iXqJnd\\_ur9COjm50EeUrGOj4Nfbf/view?usp=sharing](https://drive.google.com/file/d/ls_w7iXqJnd_ur9COjm50EeUrGOj4Nfbf/view?usp=sharing)

Sample of a DC Public Charter School Board review report of a school that had conditions imposed: [https://dcpcsb.egnyte.com/dl/WuhxEd8CN4/2022-02-03\\_DC\\_Scholars\\_10-Year\\_Review\\_Report\\_SY\\_21\\_%E2%80%9322\\_Redacted.pdf\\_](https://dcpcsb.egnyte.com/dl/WuhxEd8CN4/2022-02-03_DC_Scholars_10-Year_Review_Report_SY_21_%E2%80%9322_Redacted.pdf_)

University of Wisconsin-Milwaukee charter school accountability requirements and measures: <https://uwm.edu/education/charter-schools/accountability-requirements-and-measures/>

## Other Authorizer-Specific Resources

Atlanta Public Schools Buy Back Services Guide: [https://drive.google.com/file/d/IDiQJY8NA5XUIBCGT\\_lSrVCUh3XMdzy5e/view](https://drive.google.com/file/d/IDiQJY8NA5XUIBCGT_lSrVCUh3XMdzy5e/view)

Central Michigan University Academic Professional Learning Opportunities, 2022-23: [https://www.thecenterforcharters.org/wp-content/uploads/2022/06/2022-23\\_AcademicPLO.pdf?mc\\_cid=dcf0138363&mc\\_eid=b50714909a](https://www.thecenterforcharters.org/wp-content/uploads/2022/06/2022-23_AcademicPLO.pdf?mc_cid=dcf0138363&mc_eid=b50714909a)

Denver Public Schools charter school policies: <http://go.boarddocs.com/co/dpsk12/Board.nsf/goto?open&id=C3ZKA550DEB5>

Education Reform Now DC's 2020 Priorities: A Commitment to Equity. <https://edreformnow.org/2020/02/06/education-reform-now-dcs-2020-priorities-commitment-equity/>

New York City Co-Location Handbook. <https://nyccharterschools.org/wp-content/uploads/2020/10/CoLocationHandbook.pdf>

## National Resources

NACSA Strategic Initiatives: <https://newtimes.qualitycharters.org/>

NACSA Quality Practice Project: <https://www.qualitycharters.org/research/quality-practice-project/>

NACSA blog posts on centering community: <https://www.qualitycharters.org/2021/05/meeting-community-aspirations-in-mn-community-centered-charter-schooling-in-action/>

<https://www.qualitycharters.org/2021/05/lessons-learned-from-reviewing-a-public-charter-school-application-for-endazhi-nitaawiging-indigenous-education-by-and-for-its-community/>

## References

- Chapman, A., Mueller, B., & Henken, R. (2018). A Teachable Moment: Understanding the Complexities of Charter School Financing in Milwaukee. Wisconsin Policy Forum. [https://wispolicyforum.org/wp-content/uploads/2018/08/TeachableMoment\\_Full.pdf](https://wispolicyforum.org/wp-content/uploads/2018/08/TeachableMoment_Full.pdf)
- Day, D., Allen, V., & Henken, R. (2012). Milwaukee Public Schools' Fiscal Condition: Passing the Test, but Making the Grade? Public Policy Forum. <https://wispolicyforum.org/wp-content/uploads/2019/05/MPSFiscalCondition.pdf>
- Kava, R. (2021). Charter Schools. Wisconsin Legislative Fiscal Bureau. [https://docs.legis.wisconsin.gov/misc/lfb/informational\\_papers/january\\_2021/0030\\_charter\\_schools\\_informational\\_paper\\_30.pdf](https://docs.legis.wisconsin.gov/misc/lfb/informational_papers/january_2021/0030_charter_schools_informational_paper_30.pdf)
- Lavertu, S., & Witte, J. (2009). The Impact of Milwaukee Charter Schools on Student Achievement. *Issues in Governance Studies* (23). [https://www.brookings.edu/wp-content/uploads/2016/06/03\\_charter\\_lavertu\\_witte.pdf](https://www.brookings.edu/wp-content/uploads/2016/06/03_charter_lavertu_witte.pdf)
- Meyer, R., Archibald, S., Carl., B., Geraghty, L., Jones, C., Mader, N., & Nisar, H. (2010). Evaluation of Charter Schools in the Milwaukee Public Schools. Value-Added Research Center, Wisconsin Center for Education Research, University of Wisconsin-Madison. <https://uwm.edu/officeofresearch/wp-content/uploads/sites/91/2018/04/evaluation-milwaukee-public-charter-schools.pdf>
- Wisconsin Resource Center for Charter Schools (WRCCS). (2021). Wisconsin Charter Schools Yearbook. [https://drive.google.com/file/d/1Y2V76L5OcAwTuZYjsaZ\\_s8WThLUzfYtY/view](https://drive.google.com/file/d/1Y2V76L5OcAwTuZYjsaZ_s8WThLUzfYtY/view)
- Witte, J. F., Wolf, P. J., Dean A., & Carlson, D. (2012). Milwaukee Independent Charter Schools Study: Final Report on Four-Year Achievement Gains. School Choice Demonstration Project. <https://scholarworks.uark.edu/cgi/viewcontent.cgi?article=1074&context=scdp>
- Witte, J. F., Wolf, P. J., Dean A., & Carlson, D. (2010). Milwaukee Independent Charter Schools Study: Report on One Year of Student Growth. School Choice Demonstration Project. <https://scholarworks.uark.edu/cgi/viewcontent.cgi?article=1068&context=scdp>



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