



The Center for
Learner Equity

Equity-Minded Charter School Authorizing for Students with Disabilities

CHARTER SCHOOL EQUITY, GROWTH, QUALITY, AND SUSTAINABILITY STUDY

JULY 2024

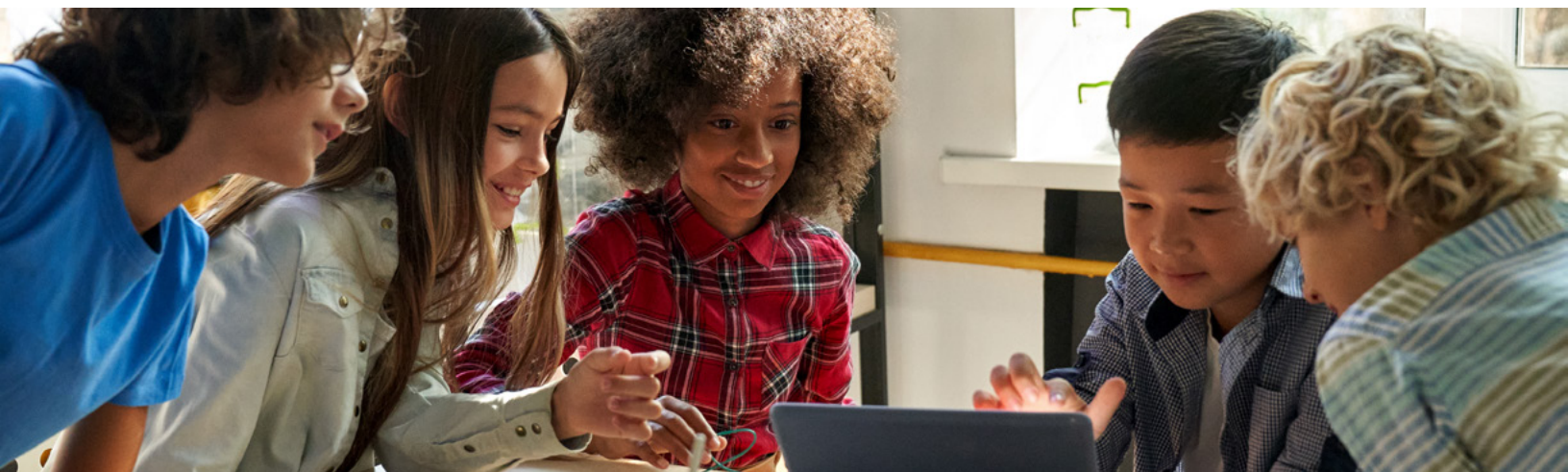
Executive Summary

Authorizers are uniquely positioned to influence educational opportunities for students with disabilities in the charter sector. However, to date, only a small number of authorizers have taken proactive steps to address the needs of students with disabilities or to hold charter schools accountable for meeting ambitious learning targets for them. This report profiles the efforts of equity-minded authorizers who have taken actions to facilitate charter schools meeting the needs of students with disabilities. We draw upon interviews with 31 staff members working at 21 charter school authorizers selected based on their implementation of practices that aim to strengthen charter schools' commitment to and success in educating students with disabilities.

We found that charter school authorizers used a variety of strategies to influence the extent to which charter schools enroll and educate students with disabilities. During the pre-application and authorization phase, authorizers sought to influence schools' plans for enrolling and educating students with disabilities directly – through application requirements, review criteria, and hands-on application assistance. Once schools were operational, authorizers primarily sought to influence schools through the accountability pressures they applied to monitor school performance and make closure and renewal decisions.

Authorizer staff emphasized the importance of taking proactive action to prepare charter schools to enroll and educate students with disabilities and the necessity of holding charter schools to ambitious benchmarks for success for all students. In so doing, authorizers described moving beyond the compliance-focused work that has long characterized their oversight of the education of students with disabilities in charter schools, instead embracing a focus on the quality of these students' experiences and the extent to which those experiences translate into learning.

These actions, however, are challenging. Authorizers described the importance of strengthening their expertise and capacity to advocate for students with disabilities. Still, they acknowledged that these investments were difficult to make given their limited internal capacity. Moreover, the lack of clear, field-wide standards for what constitutes “success” in the education of students with disabilities left many authorizers without clear guidance on how to fairly and rigorously hold charter schools accountable for their impacts on students with disabilities' learning outcomes.



Both authorizers and the actors that support and enable their work have roles to play in strengthening students with disabilities' access to and success in charter schools. Authorizers can:

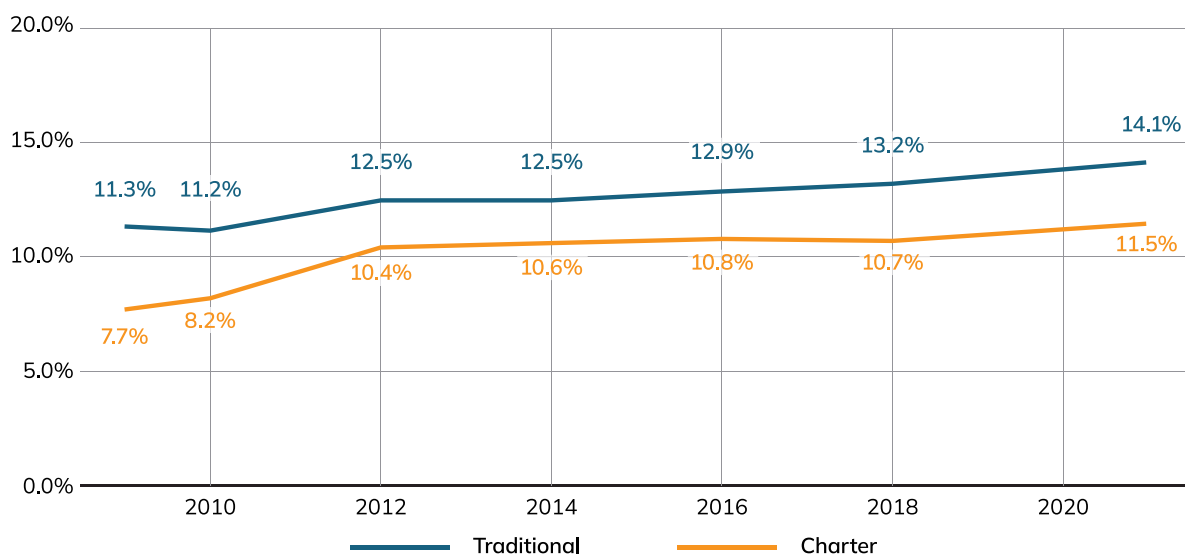
- **Invest in their capacity to directly advance educational options for students with disabilities.** The authorizer staff were unclear about what constitutes “success” for charter schools when educating students with disabilities. Acting on the needs of students with disabilities necessitates that authorizers strengthen their understanding of what excellence looks like—especially if they are to raise the bar beyond compliance-focused work. Nonprofit technical assistance providers and equity-minded charter schools that educate students with disabilities well can be allies in this work.
- **Establish students with disabilities as a priority group for authorizing new charter schools.** While authorizers can act at every phase of the authorization lifecycle, they have the most significant degrees of freedom at the entry point for new charter schools. They can communicate with prospective applicants about the importance of clear plans for enrolling and educating students with disabilities, ensure they are prepared financially to educate all students and hold prospective school leaders to high standards by only approving applicants who demonstrate the commitment and expertise to educate all students. Authorizers can also support the development of exemplary schools by issuing requests for proposals that specifically target aspiring leaders whose visions put students with disabilities at the center, rather than the periphery, of their work.
- **Hold charter schools accountable to high standards for meeting the needs of students with disabilities.** Autonomy in exchange for accountability is the linchpin of the charter sector, but for too long, the education of students with disabilities wasn't a key part of this equation. Equity-minded authorizers are changing that by making clear to schools that there are consequences for discriminating against students with disabilities and failing to meet their educational needs. Authorizers can hold charter schools to account by making students with disabilities an influential factor in renewal decisions, requiring corrective action for failing to meet benchmarks for students with disabilities, and publicly reporting on students with disabilities' access to and educational outcomes in charter schools.
- **Use their positions to influence policymakers and funders to take action on issues that limit students with disabilities' success in charter schools.** Authorizers have prominent positions in their education ecosystems and access to knowledge about the achievements and struggles charter schools and the students they educate are experiencing. These provide the foundation for advocating for changes in policy and the system at large that will help charter schools better meet the needs of all learners.

CHARTER SCHOOL EQUITY, GROWTH, QUALITY, AND SUSTAINABILITY STUDY

CLE conducted the *Charter School Equity, Growth, Quality, and Sustainability Study* to 1) identify how the experiences of students with disabilities shape the charter sector’s sustainability and 2) examine key stakeholders’ role in shaping conditions that influence how charter schools enroll and educate students with disabilities. CLE sought to describe actions by key stakeholders identified for contributing to the success of students with disabilities, particularly those from Black, Indigenous, and other people of color (BIPOC) communities, as well as for the charter sector’s sustainability. A 12-member technical working group of subject matter experts advised on the overall study methodology and served as reviewers for the five stakeholder briefs. The Bill & Melinda Gates Foundation provided funding for the research. Views expressed here do not necessarily reflect positions or policies of the foundation.

CLE took a multi-phased approach to the study. During the initial phase, we conducted a media scan of 174 state-specific journalistic reports published since 2009 at the nexus of charter schools, special education, and students with disabilities, a quantitative analysis of charter school growth over the past 15 years, and an initial round of exploratory interviews with 11 key experts knowledgeable about stakeholder policies, practices and changes influencing the education of students with disabilities in charter schools. Thereafter, CLE conducted additional research to investigate the specific actions taken by key stakeholders (i.e., states, authorizers, nonprofits, and schools/networks) to improve access and outcomes of students with disabilities and an information-rich case study of the state of Washington. We also commissioned a scoping literature review to elevate high-leverage practices for students with disabilities that have positively impacted all students, emphasizing BIPOC students. Finally, CLE hosted a national convening of key stakeholders who contributed to the research in Denver in March of 2024 to review findings and contemplate the next steps to catalyze meaningful change for students with disabilities.

Figure 1. Percentage of Enrolled Students Receiving Services Under IDEA by School Sector (2008-2021)



Sources

- Data from 2008-2010 is from the Government Accountability Office. (June, 2012). [Charter Schools: Additional Federal Attention Needed to Help Protect Access for Students with Disabilities.](#)
- Data from 2012-2021 is from U.S. Department of Education, Office for Civil Rights, 2012-21 Civil Rights Data Collection

Introduction

State law designates the entities responsible for authorizing charter schools whose responsibilities include approving new schools and ongoing monitoring of existing schools based on performance.¹ Given their breadth of responsibilities, authorizers are uniquely positioned to influence educational opportunities for students with disabilities in the charter sector.²

In practice, however, many authorizers have struggled to proactively address the needs of students with disabilities or to hold charter schools accountable for meeting ambitious learning targets for them. A 2023 special education-themed survey by the National Association of Charter School Authorizers (NACSA) reported that only 35% of authorizers that have special education responsibilities (NACSA's own categorization of non-district authorizers) require charter schools to describe their approach in educating students with disabilities in recruitment materials. When it comes to recruitment plans for students with disabilities, only 54% of authorizers that have special education responsibilities require schools to include such plans in their charter application and rubric.³ As a direct result, while a growing body of evidence has documented the positive impacts charter schools can yield for historically marginalized students, the sector's record of achievement regarding the education of students with disabilities is decidedly more negative.⁴

The lack of action on these challenges has the potential to compound the disadvantages that Black, Latinx, and low-income students, whom charter schools disproportionately enroll, experience in school. When schools do not address the needs of students with disabilities, students of color and low-income students are less likely than their white and more affluent peers to gain access to the educational resources and support they need to thrive and may be more likely to be subjected to punitive discipline.⁵ As a result, authorizer inaction related to the needs of students with disabilities may have an adverse impact across these multi-identities.

In light of this challenge, this report considers the obstacles to authorizers taking more authoritative action to address the needs of students with disabilities in charter schools and the practices they believe are helping them to close opportunity gaps for these students. We draw upon interviews with 31 staff members working at 21 charter school authorizers selected based on their implementation of practices that aim to strengthen charter schools' commitment to and success in educating students with disabilities.

We found that equity-minded charter school authorizers used a variety of strategies to influence the extent to which charter schools enroll and educate students with disabilities. Authorizer staff emphasized the importance of taking proactive action to ensure charter schools were prepared to enroll and educate students with disabilities and the necessity of holding charter schools to ambitious benchmarks for success with these students. In so doing, authorizers were moving beyond the compliance-focused work that has long characterized their oversight of students with disabilities in charter schools, instead embracing a focus on the quality of these students' experiences and the extent to which those experiences translate into learning.

These actions, however, are challenging. Authorizers described the importance of strengthening their expertise and capacity to act on behalf of students with disabilities but acknowledged that these investments were difficult to make. Moreover, the lack of clear, field-wide standards for what constitutes “success” in the education of students with disabilities left many authorizers without clear guidance on how to fairly and rigorously hold charter schools accountable for their impacts on students with disabilities’ learning outcomes.

Background

Charter school authorizers are the primary legal entities responsible for overseeing charter schools.⁶ Lacking the authority to dictate educational inputs directly, charter school authorizers exercise influence over organizational and educational outcomes through their control over charter schools’ entry, renewal, or exit, and ongoing performance monitoring. At entry, charter school authorizers are responsible for establishing application requirements, vetting aspiring school leaders, and deciding about proposed charter schools’ educational and financial viability. At renewal or closure, charter school authorizers are responsible for using data about organizational performance and academic outcomes to determine whether a charter school may continue to operate (renewal) or must cease operations (closure). Between entry and renewal or closure, many charter school authorizers engage in ongoing performance monitoring, such as requiring annual reports from charter schools and reviewing enrollment and performance data to identify areas of concern.

While authorizers perform similar functions, they vary dramatically in their organizational capacity and approach to overseeing charter schools. Depending on state charter law,⁷ authorizers may be state education agencies (SEAs), local education agencies (LEAs), independent charter boards (ICBs), municipal government or non-education government entities (NEGs),⁸ higher education institutions (HEIs), or non-profit organizations (NPOs).⁹ These varying structures can profoundly impact how authorizers approach their work and the political, financial, and organizational constraints they operate within. For example, LEA authorizers can face political and organizational pressures from the threat of enrollment loss that shape their propensity to vet and oversee charter schools fairly. Furthermore, state and district authorizers are assigned specific responsibilities under the Individuals with Disabilities Education Act (IDEA) related to compliance with the state charter law. These dual roles can lead to these authorizers being assigned responsibility to assist schools in building capacity and enforcing high-stakes accountability measures. Prior research has documented that variations in the number of authorizers, their organizational structure, and their practices for monitoring charter school performance can have significant impacts on the number of charter schools that operate in a locality and the educational outcomes of students who attend charter schools.¹⁰

How these dynamics shape authorizers’ approaches to addressing the needs of students with disabilities in charter schools remains an under-studied area. Existing evidence suggests that on the whole, charter school authorizers have not taken a proactive approach to hold charter schools accountable for students with disabilities’ access to or learning outcomes in charter schools. And because renewal decisions are often based on multiple organizational and academic indicators, charter schools can meet the authorizer’s benchmarks for success even as they perform poorly in serving students with disabilities.

Charter schools are more likely to invest in the educational needs of students with disabilities when they are subject to accountability pressures. For example, research has documented that schools that were held accountable for students with disabilities' learning outcomes used instructional time differently, were more likely to support students with disabilities in co-taught classroom settings, and were more likely to provide teachers with professional development and coaching.¹¹

Addressing gaps in accountability systems could incentivize the charter school sector—both charter schools and the other organizations in the ecosystem that support them—to prioritize the needs of students with disabilities in their work. Evidence suggests that while charter schools have made some progress in increasing the proportion of students with disabilities choosing to enroll,¹² the sector has struggled to improve academic outcomes for students with disabilities—both in comparison to traditional public schools and concerning the gap between students with disabilities and their peers.¹³

Methodology

We set out to identify the challenges equity-minded charter school authorizers face in addressing the needs of students with disabilities and illuminate specific practices that they believe are helping them improve educational opportunities. We first conducted informational interviews with established charter school experts, reviewed the literature on charter school authorizing, and sought nominations to identify the sample of equity-minded authorizers. The primary criterion for the nomination was evidence of taking intentional actions to improve students with disabilities' access to and outcomes in charter schools. Based on the literature review and informant interviews, we identified a sample of 21 authorizers that were using one or more promising practices that aimed to improve students with disabilities' experiences in charter schools.¹⁴ The sample includes authorizers in 13 states with portfolio sizes that range from 2 to over 200 schools.

Data Collection and Analysis

We conducted 31 semi-structured interviews with staff at 21 charter authorizing entities.¹⁵ We asked questions about their current challenges, the clarity of their role regarding educating students with disabilities, practices they were using that they believed benefited students with disabilities, and what impact, if any, these practices had on outcomes.

In addition, we facilitated an in-person focus group with 12 individuals employed by multiple charter authorizers at the 2023 NACSA Leadership Conference in 2023. The focus group included staff members representing charter school authorizers, and participants discussed the impact of authorizing practices on educating students with disabilities.

We transcribed all interviews and coded data thematically based on the use of practices across the authorizing lifecycle. We identified promising practices based on two criteria: (1) practices were intentionally designed to improve outcomes for students with disabilities, and (2) there was reasonable evidence that these practices yielded a positive impact on schools and students.

Study Limitations

Given the purposeful nature of our sampling strategy, the practices detailed in this report should be considered illustrative but not representative of all practices charter school authorizers are taking to address the needs of students with disabilities. While we asked interviewees about the perceived impacts of the practices they were using, we do not have definitive evidence on how the practices they reported using impact students with disabilities' experiences in charter schools or if they have collateral negative impacts.

Findings

Authorizers can influence whether charter schools equitably educate students with disabilities at every phase of the authorization lifecycle

Charter school authorizers described opportunities to influence how charter schools enroll and equitably educate students with disabilities at every phase of the authorization lifecycle (see Table 1). During the pre-application and authorization phase, authorizers can influence schools' plans for enrolling and educating students with disabilities directly – through application requirements, review criteria, and hands-on application assistance. Once schools are operational, authorizers primarily influence schools through the accountability pressures they apply to monitor performance and make closure and renewal decisions.

While staff described actions they had taken at both the points of entry and exit to ensure schools were meeting the needs of students with disabilities, they were clear that they had greater freedom of action to influence schools' before they opened their doors. This is partly a function of the high-stakes nature of approval, renewal, and closure decisions. While closures can send a powerful message to the charter sector that charter schools must take affirmative action to meet the needs of students with disabilities, it is also the highest stake move an authorizer can make. Authorizers face political and organizational risks when it comes to closure, given the intense feelings the threat of closure can trigger among parents and policymakers. Perhaps as a result, just 19 percent of authorizers with special education responsibilities reported that they would revoke a school's charter primarily based on its performance related to students with disabilities, according to NACSA's 2023 survey. Only two percent of individual charter schools with special education responsibilities would do the same.¹⁶

In contrast, authorizer actions taken at the point of entry can work to incentivize and support prospective school leaders to plan for the needs of students with disabilities in a lower-stakes setting. Authorizers described the pre-authorization process as a critical opportunity to vet and shape schools' commitment to and practices for serving students with disabilities. For some authorizers, the pre-authorization process acted as a non-negotiable "quality control mechanism," with only those operators showing strong readiness to educate all students were making it through. As one interviewee put it, "Anytime you have to review a charter school application to open, there better be an element addressing how the school is going to meet the needs of kids with disabilities."

Table 1. Authorizers can influence whether charter schools equitably educate students with disabilities at every phase of the authorization lifecycle

PHASE	LEVERS OF CHANGE
Entry: Pre-application and authorization of new charter schools	<ul style="list-style-type: none"> • Make students with disabilities a priority in how charter school applicants are evaluated • Ensure applicants have robust plans for enrolling and educating students with disabilities • Provide pre-opening technical assistance and monitoring to ensure new schools are prepared to serve students with disabilities on day one • Collaborate with other authorizers to prevent “authorizer shopping”
After authorization but before renewal: Ongoing compliance and performance monitoring	<ul style="list-style-type: none"> • Establish a robust accountability framework that explicitly considers how well schools are meeting the needs of students with disabilities • Develop an early warning system that uses leading indicators to identify issues of concern related to schools’ legal and educational obligations to students with disabilities • Use corrective action plans to help schools address failures to educate students with disabilities equitably
Exit: Renewal and closure decisions	<ul style="list-style-type: none"> • Make students with disabilities’ access to and educational outcomes in charter schools a factor in renewal and closure decisions • Act to minimize the impact of closure decisions on students with disabilities
<p><i>Source: Author analysis of 31 interviews with staff at 21 authorizing entities in 2023.</i></p>	

Practice Spotlight: Ensuring Charter Schools are Prepared to Educate Students with Disabilities on Day One

Equity-minded authorizers took different approaches to using the application and authorization process to influence prospective school leaders’ plans for educating students with disabilities. Some authorizers used the application process to signal to prospective applicants about the authorizer’s commitment to equity and to screen out applicants who demonstrate insufficient expertise or planning for the education of students with disabilities. For example, one interviewee described using the application process to screen for “attitudinal red flags,” such as statements indicating that students with disabilities or other special populations would not be “a good fit” for the school’s model.

The **DC Public Charter School Board** (DC PCSB) uses inclusiveness as one of five critical standards for approving new charter applications. During the initial review of applications, DC PCSB staff ask specific questions about the special education expertise of the school's founding staff team, their plans for supporting students with disabilities, and the continuum of services they plan to provide. Staff from DC PCSB said this vetting process made it clear to prospective applicants that, as the authorizer, they were committed to sponsoring schools with the mindsets and expertise to educate students with disabilities equitably.

Similarly, the **New York State Education Department** (NYSED) points prospective applicants to a detailed request for proposals, which outlines clear criteria and identifies the authorizer's priorities for new school authorizations. NYSED has used the RFP to communicate with prospective applicants the importance of addressing the needs of students with disabilities, with both criteria (e.g., strategies for meeting or exceeding enrollment and retention of students with disabilities) and priorities (e.g., proposals for schools designed to meet the needs of students with specific, low-incidence disabilities) centered on the needs of these students. This approach has resulted in NYSED authorizing exemplary charter schools specifically designed to meet the needs of students with disabilities. The school leader at Bridge Preparatory Charter School, focusing on students with dyslexia or language-based learning differences, told us: "They took a chance on our kids, mission, and school. Its existence represents how our authorizer is willing to be innovative."

Research shows that authorizers that adopt equity-oriented missions and clearly communicate those missions to external actors during the application process are more likely to receive applications for schools that attend to issues of equity and access for historically marginalized students.¹⁷ Many authorizing staff we interviewed suggested that authorizers can continue strengthening charter schools' capacity to educate students with disabilities after their application has been approved but before the school opens its doors for students through ongoing support to charter school developers.

The **Charter School Institute** (CSI), the sole statewide authorizer in Colorado, takes a hands-on approach with new school operators, monitoring key operational milestones that signal schools' readiness to open and providing inclusion-oriented technical assistance and training during the pre-opening year. CSI said the collaborative approach to pre-opening planning enabled them to help founding leaders understand their legal obligations to students with disabilities in a low-stakes setting. CSI staff believe that these efforts have helped put schools in a stronger position to increase enrollment of students with disabilities in charter schools, which has risen from 3.9% in 2020-2021 to 7.5% in 2022-23 but continues to lag behind the state average of 12.4%.

Along the same lines, the **Tennessee Public Charter School Commission** (TPCSC) requires new charter schools to attend onboarding training during the pre-opening year. This training consists of an overview of district monitoring procedures, expectations for implementing special populations programming, and licensing requirements for staff members providing services. TPCSC often tailors these presentations based on specific schools' perceived needs or knowledge gaps within the ready-to-open time frame.

At **Osprey Wilds** (OW), a non-profit authorizer in Minnesota, strengthening charter schools' plans for educating students with disabilities is not simply about vetting their preparedness to meet compliance benchmarks. In overseeing schools that enroll a high percentage of Indigenous and refugee populations, OW has used its position to prepare schools to recognize and address the intersectional needs of students in their communities. OW encouraged new operators to establish culturally responsive special education programs, including hiring Indigenous special educators or staff with sufficient cultural knowledge. A staff member said considering the intersectional nature of the students and families has strengthened schools' ability to meet the needs of the students they serve. In one example shared by a staff member, OW's pre-opening technical assistance supported a school that planned to serve an East African community to design a culturally responsive special education program that addressed the needs of under-identified students.

Notably, the work of authorizers in the application and pre-opening phase could also involve preparing charter schools financially to meet their obligations to students with disabilities. For example, CSI requires approved charter schools to set up a special education reserve fund and adjust their budget for the following year to include the costs associated with meeting all students' needs. A staff member from another authorizer said prospective school leaders must be prepared to answer financial questions like "What are your [financial] contingency plans? Where are your cash reserves?" Authorizers said financial management was vital to ensuring schools were prepared to educate all students.



Authorizers should demand equity in enrollment. Outcomes are skewed if schools aren't serving ALL students. Excluding students with disabilities from choice is a civil right concern.

– Participant, Learning Exchange,
March 27, 2024, Denver, CO.



Practice Spotlight: Moving Beyond Compliance to Establish Ambitious Benchmarks for Success

Once schools are operating, authorizers engage in ongoing monitoring to ensure that schools deliver on the commitments outlined in their charter, including implementing special education programs with fidelity. These functions are complicated in the case of students with disabilities, where oversight has historically focused on compliance and deprioritized whether schools are meeting these students' educational needs.

Like other public schools, charter schools must fulfill the responsibilities to educate students with disabilities as articulated in federal, and, depending on the particulars of their state charter law, state special education laws.¹⁸ However, these legal obligations do not provide strong benchmarks for whether charter schools are equitably educating students with disabilities;¹⁹ nor do they align with many authorizers' desire to go beyond minimum requirements when it comes to investing in educational options for historically marginalized students. One participant at the Learning Exchange said, "Compliance is important, but [our work] doesn't just stop there. With our authorizing practice, we absolutely focus on quality."

Most state charter laws do not specifically require authorizers to consider students with disabilities as a critical component of their oversight of charter schools.²⁰ Equity-minded authorizers, however, said they use ongoing performance monitoring as an opportunity to affirm that the experiences of students with disabilities are an essential component of school performance.

However, raising the bar requires authorizers to develop robust performance frameworks that adequately consider charter schools' legal and educational responsibilities to students with disabilities. Neither state nor federal law nor guidance clarifies how to do this. One interviewee reflected on the ambiguity, asking, "What does it mean for a student with an IEP to make academic progress?"

Despite the lack of agreed-upon standards to judge charter schools for how they educate students with disabilities, the authorizer staff we interviewed described the importance of investing in robust performance frameworks and systems for monitoring. This work prioritized considering students with disabilities' academic outcomes in charter schools. However, it also involved investing resources into understanding the quality of educational experiences for students with disabilities and whether schools were delivering on the commitments outlined in their charter.

Compliance is important, but [our work] doesn't just stop there. With our authorizing practice, we absolutely focus on quality.

– Participant, Learning Exchange,
March 27, 2024, Denver, CO.

Data is the backbone of accountability frameworks. Improving transparency in data systems enables authorizers to communicate with schools about the data and results they are considering and supports technical assistance in addressing areas of concern. One authorizer that has made significant investments to develop this structure is **CSI** of Colorado. CSI has built out an Equity Screener dashboard with school-level data for internal (authorizer) and external (school) users.²¹ The dashboard disaggregates student-level data across six indicators (i.e., enrollment, stability, attendance, discipline, growth, and completion) so that CSI and school staff can identify gaps and trends. CSI provides additional support for schools to use this dashboard through training videos.²² They also consult with schools to determine next steps to address challenges.

Evaluating whether schools are meeting the educational needs of students with disabilities has long been complicated because these students have individualized goals that may or may not align with the grade-level standards assessed by state assessments. To address this challenge, some authorizers reported using student growth data to hold charter schools accountable for students with disabilities' learning outcomes. **The Office of Charter Schools at Ball State University** (BSU) in Indiana has shifted from monitoring the percentage of students with disabilities who achieve proficiency to using multi-year growth trajectories that assess how much these students are learning. This reflected their desire to ensure schools in their portfolio were supporting accelerated learning outcomes for students with disabilities. According to a staff member, the focus on growth has resulted in many schools in their portfolio strengthening their systems of support for students with disabilities, including increases in licensed teaching and nursing professionals, improvements in timely identification and evaluation, the development of medical plan policies, behavioral intervention plans, instructional accommodations, parent notice, and due process protections. This authorizer also examines special education as one potential "Indicator of Distress" in charter school performance.²³ By adopting a root cause lens when overseeing schools, authorizers consider charter schools' failure to educate students with disabilities as a common manifestation of overall school culture breakdowns. Authorizing staff at BSU consider detecting these shortcomings a critical capability for equity-minded authorizers.

In a similar vein, the **Tennessee Public Charter School Commission** updated its School Performance Framework to include the performance of students with disabilities relative to their geographic peers.²⁴ According to a staff member, the Commission's previous framework did not highlight how charter schools educated different subgroups compared to district schools—an approach that they believed limited their ability to focus schools' attention on the academic outcomes of students with disabilities.

However, academic outcomes provide a lagging indicator for authorizers—student growth data is not available for new schools or schools that do not operate in tested grades. To supplement its outcome metrics, many equity-minded authorizers have turned towards monitoring other indicators of students with disabilities' experiences in school. Ball State University (BSU) actively monitors dis-enrollment data, disability classifications, and the number of new diagnostics evaluations. According to a staff member, these data are critical to help the authorizer detect any disenfranchisement or over-identification of students with disabilities. They explained, "If a school has a high evaluation rate and many were new assessments, we would be concerned about over-identification. In contrast, when more students with existing IEPs are moving into the charter school, we can see it's a result of parent choice and positive awareness in the community about how the school is serving students with disabilities." BSU also reviews data from the Results-Driven Accountability Matrix,²⁵ a tool developed by the Office of Special Education at the Indiana Department of Education as part of federal accountability requirements, which reports the number of students assessed via alternative assessments, the inclusion of students with disabilities in the general education classroom, and federal compliance indicators. Should intervention be required by BSU, these data inform the development of intervention plans.

The **DC PCSB** has taken a similar approach to proactively monitor intermediate indicators related to students with disabilities' educational experiences in charter schools. The Special Education Audit and Monitoring Policy (SEAMP) "seeks to identify patterns of inequity in student outcomes that may be caused by a lack of access to quality programming for students with disabilities"²⁶ and includes five criteria that may trigger a special education audit: rates of out-of-school suspensions, expulsion, enrollment, re-enrollment, and midyear withdrawals among students with disabilities compared with traditional public schools or students without disabilities. For example, audits are triggered whenever fewer than 8.5 percent of enrollment are students with disabilities; schools show a lack of evidence in Child Find, or intervention practices, and inclusive recruitment strategies are absent.

Authorizers also pointed to the importance of qualitative data collection in their efforts to establish more rigorous standards for how charter schools educate students with disabilities. One interviewee noted the inherent limits of relying upon student achievement data alone to evaluate whether charter schools equitably educate students with disabilities. According to this individual, "You need to understand [student achievement and the quality of instruction] together...Too often, we focus on [achievement] in trying to help schools."

The **Massachusetts Department of Elementary and Secondary Education (DESE)** uses site visits to inform renewal decisions. DESE conducts focus groups with a wide range of school stakeholders as part of this process, looking for how “all partners in classrooms [support students with disabilities].” In a similar approach, DC PCSB also incorporates a Qualitative Site Review (QSR) for every charter school at least once every five years. The QSR involves an unannounced site visit to the school, where a reviewer observes 75 percent or more of core-content classrooms using Charlotte Danielson’s Framework for Teaching. Findings from the site visit are debriefed with the school leadership teams and reported publicly on the authorizer’s website.²⁷ By introducing a high level of transparency, DC PCSB has motivated schools to examine their practices and take responsibility for how these practices compare to their peers.²⁸

At the **Charter School Institute of the State University of New York (SUNY)**, the fifth-largest authorizer in the nation overseeing a high volume of schools, site visits are a core component of the authorizer’s work to address the needs of students with disabilities. During site visits, staff members have a chance to observe how students with disabilities are being educated and look beyond compliance to assess the quality of instruction. A staff member said, “We believe that it is our function to judge the quality of [instruction]. So it’s not just about if there is an ICT [Integrated Co-Teaching] setting, but is that ICT setting effective? Are those models that are in place serving the needs of the students? Is there appropriate differentiation and lessons to serve the needs of the students in those classrooms? If there’s a 12:1 setting mandated in the IEP, what does instruction look like in those rooms? Are they appropriately staffed? Are they staffed by people with the right qualifications, certification, or some other qualifications? Is the quality of the instruction that’s happening rigorous?” Importantly, SUNY triages this work, reserving the most intensive and robust reviews for schools that have weaknesses in their record of academic success.

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– Charter School Institute of State University of New York

Practice Spotlight: Acting on Evidence that Charter Schools are Failing to Meet Their Obligations to Students with Disabilities

When authorizers determine that a charter school they oversee is not living up to its commitments to students with disabilities, they must decide how they will intervene. Authorizers identified a range of actions they could take in the event of failures to enroll students with disabilities, comply with state and federal regulations for students with disabilities, or meet expectations for student learning. This included subjecting schools to a required corrective action plan to remediate problems, providing or requiring schools to participate in technical assistance activities, or, in extreme cases, revoking the school’s charter.

Closure or revocation based on charter schools' failure to educate students with disabilities is a powerful lever authorizers use to signal the importance of inclusion.²⁹ However, it is among the most organizationally and politically costly actions an authorizer can take. Perhaps as a result, failure to equitably educate students with disabilities is rarely the primary factor that motivates closures, and very few authorizers list failure in educating students with disabilities as a primary factor in closing schools.³⁰

Only 2 authorizers out of the 21 authorizers in our sample reported ever using closure due to failures to educate students with disabilities. Of these, closure decisions were driven by egregious noncompliance with federal special education law. In one example, a staff member with **Albuquerque Public Schools (APS)** in New Mexico described turning to closure after a charter school in their portfolio failed to maintain the required documentation of support provided to students with disabilities, even after being subject to a corrective action plan. Closure of the school helped APS significantly reduce the rate of noncompliance among students with IEPs from around 20 percent in 2015 to 1 percent to 3 percent at present.³¹

However, authorizers are often confronted with intense scrutiny of closure decisions. In many states, there is the prospect that a school will appeal a closure decision to other entities with legal authority to support renewal. The **Charter School Review Board (CSRB)** in **North Carolina** has revoked three charters due to "exceptional children noncompliance" since 1999.³² In 2023, after CSRB revoked a charter based on "federal violations in the exceptional children program," the school appealed.³³ According to a staff member we interviewed at the **North Carolina Department of Public Instruction (NCDPI)**, a new operator sought to reopen the school with the same founder, but CSRB rejected this new application. This appeal is pending before the state board, but the NCDPI staff shared that a newly introduced appeal process (since late 2023) is making them reconsider situations in which closure appears warranted.³⁴

Given the stakes surrounding the revocation and closure process, many authorizers are considering other intervention measures to address compliance and performance challenges in charter schools. This might include issuing a required corrective action plan, subjecting schools to more intense monitoring, and requiring schools to participate in technical assistance activities meant to remedy deficiencies. For example, the **Tennessee Public Charter School Commission (TPCSC)** offers monthly one-to-one coaching and training to school leaders to support compliance with state and federal rules. Participation in training is often mandatory for schools facing corrective action plans triggered by compliance concerns around risk-based monitoring.



Some authorizers have used the intervention toolset to address issues beyond compliance. **Osprey Wilds** (OW) in Minnesota described intervening in a school in its portfolio after routine monitoring showed that students with disabilities were significantly underperforming state and district averages compared to other student subgroups at the school. OW required the school to evaluate the special education program and design a plan to close the achievement gap. After analyzing several potential contributing factors, such as special education staffing and service scheduling, the school determined that the outcome gap was mainly due to its practice of pulling students with disabilities out of core instructional time, limiting their access to the curriculum. In light of this finding, the school restructured its schedule so that interventions did not detract from students' access to core, general education instruction.

When using interventions short of closure, some interviewees noted the inherent tension of offering direct assistance to schools. They said schools sometimes desire support, but authorizers must carefully hold to the autonomy-accountability exchange inherent to charter schools. As one said, "Sometimes school leaders look [to] authorizers to solve all their problems....[But] higher autonomy comes with higher accountability. That's the purpose of a charter school."

While authorizers shared stories of charter schools that benefited from their direct intervention efforts, some noted that closure remained an essential tool. One interviewee described working with a school for months to address systemic challenges in their special education program to no effect, leaving her wondering, "How do you get adults to actually take action?" The school was eventually closed, having failed to rectify its troubles despite the efforts of its authorizer to help.

EQUITY-MINDED PRACTICE

Moving From Reactive to Proactive: Addressing Discriminatory Enrollment Practices In Charter Schools

In 2012, DC PCSB developed the Mystery Caller initiative to address concerns that unwelcoming interactions between prospective parents and school staff could discourage families from enrolling students with disabilities in a charter school. The initiative represents a radical departure from traditional approaches to special education oversight, which rely on parents to identify potentially discriminatory behavior by making a formal complaint.

Under the initiative, DC PCSB staff members pose as parents to inquire about enrollment for a child with a disability. Schools where interactions are identified as inappropriate or discriminatory are screened a second time to determine whether there is evidence of a systemic pattern that discourages families of students with a disability from enrolling. DC PCSB can issue Notices of Concern to LEAs where violations occur. Schools need to respond appropriately to further mystery calls and attend a Registrar Professional Learning Community meeting to have their Notices of Concern lifted. In 2022, 20 schools out of 134 had a violation, 5 of which also failed the second round of screening. The most common reasons for violations include staff's lack of knowledge about the enrollment process and lack of awareness of the obligation to provide specialized programming. This initiative has been highly effective in raising the bar for IDEA compliance.

Influencing how charter schools enroll and educate students with disabilities requires authorizers to invest in their capacity and expertise

Authorizers described the importance of strengthening their expertise and capacity to act on behalf of students with disabilities. According to NACSA's 2023 survey, most authorizers employ a full-time employee for every 1 to 10 schools in their portfolios.³⁵ This can add up to dozens of team members among larger authorizers, enabling investments in the specialized expertise and support of thoughtful authorizing practices for students with disabilities. However, most authorizers oversee relatively small portfolios, limiting opportunities to invest in specialists. As one interviewee noted, "Most of the [charter schools] authorized are [sponsored by] districts with fewer than five schools...It's like one person's job. If that's the scale you are dealing with, you have neither resources nor expertise." Another interviewee noted, "More often than not, charter authorizers are not savvy about special education. They don't give it a lot of weight...I could count on one hand the number of authorizers that are savvy enough and serious enough about accountability for special education that they would take action."

Even among authorizers with more extensive portfolios, staffing remains a persistent challenge. As one interviewee noted, "We have 6 staff overseeing over 100 schools...if we want high-quality schools, we need high-quality authorizing, and if we want high-quality authorizing, we need to pay for it." Capacity challenges confronting authorizers are especially acute when they incorporate more robust practices for assessing the quality of schools in their portfolio. One interviewee, who works at an authorizer that has incorporated site visits into their performance framework, said that conducting site visits stretched the limits of their admittedly large team.

Strengthening authorizer capacity to address the needs of students with disabilities isn't just about the number of people they employ. Authorizers who took a more proactive and affirmative stance towards addressing the needs of students with disabilities also described the importance of building expertise in special education and the educational needs of students with disabilities. Authorizer staff pointed out that special education often involves intricate legal, pedagogical, and administrative considerations, and authorizers need to understand all of them to effectively raise the bar for how charter schools serve students with disabilities. As one authorizing staff member shared, "[Shifting from compliance-focused work] has created confusion about authorizers' role, especially in special education. Our special education staff have to walk that fine line. It requires our coordinators to have incredible content knowledge around special education and a strong understanding of good authorizing practices." Another noted, "There are often conversations [about] schools [being] in compliance. But [are they using] best practices?"

To strengthen expertise, authorizers reported investing in staff who brought understanding of students with disabilities to their teams. For example, **Knox County Schools** (KCS) in Tennessee and **Prince George's County Public Schools** (PGCPS) in Maryland, are two authorizers that tap staff with special education expertise or experience to review new applications for charter schools.³⁶ These individuals, interviewees reported, are better positioned to evaluate schools' plans for serving students with disabilities with an eye toward whether they understand schools' legal requirements and high-quality special education programming.

In another example, SUNY engages expert consultants with specialized expertise as needed to assist with the oversight process. One staff member shared: “We are very purposeful in finding consultants with expertise [in the needs of students with disabilities]. For example, we brought in multiple experts in the field of autism for the evaluation of the [NYC Autism School].” When asked to identify their approach’s impact, SUNY pointed out that 85 percent of their schools consistently outperform their proximate districts.

Still, even authorizers that have invested in developing expertise and managing large portfolios of charter schools with outstanding records pointed to gaps in their ability to leverage their roles better to support students with disabilities. One interviewee noted that their team would “love” technical assistance to strengthen the outcome measures they consider but struggled to find examples to use as a foundation to develop nuanced measures. She elaborated, “Disability is not a monolithic group, but we’re looking at [students with disabilities] as a monolithic group. So how do we change that?”

Perhaps more troublesome, some authorizers reported obstacles to securing timely access to the routine performance data that education systems already produce. As a high-volume authorizer staff member said, “[The state] owns performance data and all other data we need to inform our work. There are lots of analyses we’d like to perform [and] information that we’d like to generate. Still, we don’t always have access to the data in a timely manner...[It’s like] constantly pushing a rock up the hill.” Another interviewee who worked at a small nonprofit authorizer with a tiny portfolio confessed that they lacked “access to student data” and had to “rely on [their] relationship [with school staff and parents]” to get the information they need for accountability functions. They took that responsibility seriously, using site visits and conversations with stakeholders to guide their inquiries, but the limitation was serious.

EQUITY-MINDED PRACTICE

Knox County Schools (KCS) in Tennessee and **Prince George’s County Public Schools (PGCPS)** in Maryland, tap staff with special education expertise or experience to review new applications for charter schools.³⁷ These individuals, interviewees reported, are better positioned to evaluate schools’ plans for serving students with disabilities with an eye toward whether they understand schools’ legal requirements and high-quality special education programming.



Some authorizers go above and beyond their core responsibilities to remove obstacles charter schools confront in educating students with disabilities

While acknowledging their mixed access to data and sometimes variable relationships with school staff, charter school authorizers have unique vantage points on systemwide challenges that limit charter schools' effectiveness with students with disabilities. While outside of their core, legally-mandated responsibilities, some authorizers have worked to address systemic challenges that they believe impact charter schools' ability to meet the needs of all learners. As one interviewee noted, "Addressing [issues] from the top down is definitely something we need to do when breaking down some barriers." This work could involve advocating for policy changes that can strengthen charter schools' capacity, using discretionary resources to help charter schools mitigate the impacts of extraordinary special education costs, and supporting ecosystem development efforts that meet charter schools' need for technical assistance via the nonprofit sector.



We need authorizing funding reform at the federal level. Charter School Program funding could be used for equity, civil rights, or community engagement issues instead of funding endless growth with little or no regard to quality.

– Participant, Learning Exchange, March 27, 2024, Denver, CO



In New Orleans, charter authorizers were instrumental in passing a differentiated funding formula for educating students with disabilities. Before this, the standard per-pupil funding formula was not sufficiently individualized to meet various student needs, including special education. To address this inequity, in 2015, the Recovery School District developed the District Level Funding Allocation (DLFA) with five funding tiers for students with disabilities, amongst other student characteristic funding categories.³⁸ Based on this new funding formula, all New Orleans schools receive baseline funding differentiated by student needs. Two charter school authorizers, the [Louisiana State Board of Elementary and Secondary Education](#) (BESE) and the [Orleans Parish School Board](#) (OPSB), were influential in approving the DLFA around 2016. Because this funding formula required periodic review and amendments identified by stakeholders' input, BESE and OPSB oversaw additional accountability.

Authorizers can set up reserve funds or risk pools specifically designated for students with disabilities who require additional resources. While context-specific, accessing these funds is generally predicated on meeting specific criteria, an extra layer of review. This approach helps mitigate the potential strain of extraordinary special education costs. For example, the [Colorado Charter School Institute](#) (CSI) has incorporated structures to support charter schools that incur extraordinary costs for educating students with disabilities. CSI allocates funds annually from its own operating revenues³⁹ as "High-need Grants" for CSI-authorized schools in their first year of operation, including those with increasing numbers of students with disabilities who require significant support. CSI requires the school to exhaust its special education reserve fund before applying for a grant from the authorizer to cover the additional costs. CSI staff shared, "This is a deliberate decision, knowing it comes from our operating revenues." CSI staff reported that creating a source of financial support has strengthened school-authorizer partnerships and improved the education students with disabilities receive.

In New York, the **State Education Department** (NYSED) understood that charter schools in Western New York lacked access to the special education support and technical assistance that charter schools in other areas of the state enjoyed. To address this challenge, the authorizer worked with local stakeholders to create a special education technical assistance structure that charter schools in the region could leverage to strengthen their capacity to educate students with disabilities. The collaborative was founded in 2019. It offers training and professional development to teachers and school leaders, facilitates the sharing of effective practices across schools in the region, and advocates for students with disabilities and their families to ensure they can access inclusive educational opportunities. According to a staff member from NYSED, they chose to invest in the effort with the understanding that when schools have access to technical assistance, “[they] rise to the occasion [of educating students with disabilities].”

Budgets permitting, authorizers may also allocate discretionary funds to schools to strengthen charter schools’ capacity to educate students with disabilities. The **Los Angeles Unified School District’s** (LAUSD) Division of Special Education established the Charter Operated Programs (COP), through which by 2024, over 20 million dollars have been awarded to over 175 independent charter schools to support their special education capacity.³⁹ According to a staff member working at a charter high school authorized by LAUSD, the COP grant not only helped the school create a co-taught program for students with intellectual disabilities, but it also fostered a community of practice where this school became a model demonstration site for co-teaching practices.



Conclusion and Recommendations

More than three decades ago, the first charter school opened its doors, launching a national experiment in whether the tools of charter authorizing—control over entry and exit but not delivery—could create educational options that better meet the needs of all learners. While we know more today about the opportunities and challenges authorizers confront, understanding how they influence students with disabilities' experiences in charter schools has lagged.

This report has detailed how equity-minded charter school authorizers are breaking new ground and leveraging their influence over the charter sector to spur the creation of charter schools prepared for the needs of students with disabilities. In centering the experiences of students with disabilities across the lifecycle of authorization, charter school authorizers are setting a new benchmark for what it means to educate students with disabilities in charter schools equitably and importantly, in public education more generally. The authorizer staff we spoke with were clear: compliance is the first step, not the last, in the path towards better educating students with disabilities.

At the same time, this report also points to headwinds that will limit uptake and success with the practices equity-minded authorizers described. Authorizers reported struggling to hold schools accountable for the academic progress of students with disabilities in charter schools in part because policymakers and researchers have long failed to provide any guidance on what this means, preferring instead to fall back on compliance benchmarks that bear little connection to what students with disabilities experience in school. Addressing this gap will be essential. Further, authorizer staff made clear that their ability to live up to their aspirations for excellence and equity in authorizing hinged greatly on investments in their capacity, which are far from guaranteed.

Authorizers and the actors that influence them have essential roles in raising the bar for what it means to hold charter schools accountable for educating students with disabilities. This work starts with the standards that authorizers use to guide the authorization and renewal of charter schools. Authorizers often possess significant freedom to set entry requirements and benchmarks for success, and they can use these to create educational options that benefit students with disabilities. Authorizers can also extend their reach via technical assistance efforts and by using their positions to influence other actors in the ecosystem to prioritize students with disabilities. This may include:

- **Investing in their capacity and expertise to advance educational options for students with disabilities.** The authorizer staff we spoke to were clear about the gaps in their understanding of what constitutes “success” for charter schools when educating students with disabilities. Acting on the needs of students with disabilities requires authorizers to strengthen their understanding of what excellence looks like—especially if they are to raise the bar beyond compliance-focused work. Nonprofit technical assistance providers and equity-minded charter schools that serve students with disabilities well can be allies in this work.

- **Establishing students with disabilities as a priority group for authorizing new charter schools.** While authorizers can act at every phase of the authorization lifecycle, they have the most significant freedom at the formation of new charter schools. They can communicate with prospective applicants about the importance of clear plans for equitably enrolling and educating students with disabilities, and they can hold prospective school leaders to high standards by only approving applicants who demonstrate the commitment and expertise to educate all students. Authorizers can also support the development of exemplary schools by issuing requests for proposals that target aspiring leaders whose visions put students with disabilities at the center, rather than the periphery, of their work.
- **Holding charter schools accountable to high standards for meeting the needs of students with disabilities.** Autonomy in exchange for accountability is the linchpin of the charter sector, but for too long, the education of students with disabilities wasn't a key part of this equation. Equity-minded authorizers are changing that by making clear to schools that there are consequences for discriminating against students with disabilities and failing to meet their educational needs. Authorizers can hold charter schools to account by making students with disabilities an influential factor in renewal decisions, requiring corrective action for failing to meet benchmarks for students with disabilities, and publicly reporting on students with disabilities' access to and educational outcomes in charter schools.
- **Using their positions to influence policymakers and funders to take action on issues that limit students with disabilities' success in charter schools.** Authorizers have prominent positions in their education ecosystems and access to knowledge about the successes and struggles charter schools and the students they serve are experiencing. These provide the foundation for advocating for changes in policy and the system at large that will help charter schools better meet the needs of all learners.



The most important [influence on] the success of charter schools is authorizers' quality. If we have a situation where [authorizers are] under-resourced and under-experienced and have limited expertise, you are heading towards a mediocre second option for public education.

– Charter school policy expert



Authorizers, however, do not act alone. They, too, are influenced by other actors in the ecosystem—policymakers, funders, support organizations, advocates, and researchers—who can strengthen authorizers' commitment to considering the needs of students with disabilities and support their efforts to raise the bar on what that means.

- **Policymakers** can act to ensure that students with disabilities are included in charter school authorizing standards and that public investments in authorizers are commensurate with the organizational demands of their work.

- **Funders** can prioritize students with disabilities in their work in the charter ecosystem, including supporting initiatives to build and strengthen trusting relationships between LEAs and authorizers, catalyzing the development of technical assistance infrastructures for both schools and authorizers, investing in research that establishes new benchmarks for success for the educational outcomes of students with disabilities, and creating data systems to support authorizer capacity.
- **Support Organizations** can partner with charter school authorizers to strengthen their understanding of the needs of students with disabilities and help them establish more rigorous benchmarks for screening new school applications and renewals.
- **Advocates** can call out authorizers who fail to hold charter schools accountable for their work with students with disabilities and celebrate those who do. They can also lobby state policymakers for changes that make clear that authorizers are responsible for ensuring charter schools equitably educate students with disabilities.
- **Researchers** can help authorizers and the field understand what it means to measure and evaluate how charter schools educate students with disabilities.



Appendix

Table A1. Charter School Authorizers Included in This Study

STATE	NAME OF AUTHORIZING ENTITY	TYPE	# OF CHARTERS
CA	Los Angeles Unified Schools District	LEA	279
CA	San Diego Unified School District	LEA	49
CO	Colorado Charter School Institute	LEA	40+
DC	District of Columbia Public Charter School Board	ICB	136
IN	Office of Charter Schools, Ball State University	HEI	21
MA	MA Department of Elementary and Secondary Education	SEA	76
MD	Prince George’s County Public Schools	LEA	9
MI	Charter Schools Office, Grand Valley State University	HEI	79
MI	Center for Charter Schools, Central Michigan University	HEI	70
MN	Osprey Wilds	NPO	36
MN	Student Achievement Minnesota	NPO	2
MO	Missouri Charter Public School Commission	ICB	21
NC	Office of Charter Schools, NC Department of Public Instruction	SEA	202
NM	Albuquerque Public Schools	LEA	20
NY	Charter School Institute, State University of New York	HEI	222
NY	New York State Education Department	SEA	38
SC	South Carolina Public Charter School District	LEA	38
TN	Memphis-Shelby County Schools	LEA	9
TN	Tennessee Public Charter School Commission	ICB	20
TN	Knox County Schools	LEA	2
WY	Wyoming Charter School Authorizing Board	ICB	5

About the Center for Learner Equity (CLE)

CLE is a nonprofit organization dedicated to ensuring that students with disabilities have equitable access to high-quality public education. CLE provides research, policy analysis, coalition building, and technical assistance to a variety of stakeholders nationwide.

Mission

We are committed to catalyzing student success and eradicating the complex, pervasive, and systematic barriers that prevent students with disabilities from accessing school choice, educational opportunities, quality support, and inclusive environments.

Vision

All students with disabilities are respected, learning, and thriving.

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End Notes

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- ³³ Childress, Grace. “State Board of Education Panel to Hear Appeal of Charter Schools Review Board Decision.” *NC News Online* (2023). <https://ncnewsonline.com/2023/11/20/state-board-of-education-panel-to-hear-appeal-of-charter-schools-review-board-decision/>.
- ³⁴ In 2023, the North Carolina legislature passed [HB618](#), which allowed the State Board of Education to hear appeals from schools regarding renewals, applications, and modifications to the charters that were denied by the Charter Schools Review Board. Before this bill, only revocations could be appealed to the SBE.
- ³⁵ National Association of Charter School Authorizer. (2022). *State of Authorizing Report: Staffing*. <https://qualitycharters.org/authorizing-staffing/>
- ³⁶ Knox County Schools. *Charter School Authorization Handbook* (2022). <https://www.knoxschools.org/cms/lib/TN01917079/Centricity/Domain/1053/KCS%20Charter%20School%20Handbook%202022.pdf>.
- ³⁷ New Schools for New Orleans. *Just the Facts: The Superintendent’s Role in School Funding* (2022). <https://newschoolsforneworleans.org/just-the-facts-the-superintendents-role-in-school-funding/>; Babineau, Kate, Dave Hand, and Vincent Rossmeyer. “The State of Public Education in New Orleans, 2018.” *Cowen Institute* (2018). <https://files.eric.ed.gov/fulltext/ED588875.pdf>.
- ³⁸ Based on an interview with a CSI staff member, we learned that CSI by statute retains 3% of the state per pupil revenue for all authorized schools. These funds are used to administer CSI’s authorizing responsibilities.
- ³⁹ Los Angeles United School District. *Charter Operated Programs Fact Sheet* (2018). <https://www.lausd.org/cms/lib/CA01000043/Centricity/domain/361/charter/LAUSD%20COP%20Fact%20Sheet%202018-19%20Uploaded%209.17.18.pdf>.