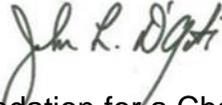




**TO:** The Honorable the Members of the Board of Regents

**FROM:** John L. D'Agati 

**SUBJECT:** Renewal Recommendation for a Charter School Authorized by the Board of Regents

**DATE:** June 3, 2020

**AUTHORIZATION(S):** 

### SUMMARY

#### **Issue for Decision**

Should the Board of Regents approve the proposed renewal charter for the following charter school authorized by the Board of Regents pursuant to Article 56 of the Education Law (the New York Charter Schools Act):

1. **Charter School of Inquiry** (short-term two-year renewal)

#### **Reason(s) for Consideration**

Required by State statute.

#### **Proposed Handling**

This issue will come before the Full Board for action at its June 2020 meeting.

#### **Procedural History**

The New York State Education Department (the Department) made the renewal recommendation being presented to the Board of Regents for approval and issuance as required by Article 56 of the Education Law and 8 NYCRR 119.7.

#### **Background Information**

##### **Statutory Requirements Pertaining to Regents Decision Making**

Article 56 of the Education Law created charter schools to:

- (a) Improve student learning and achievement;
- (b) Increase learning opportunities for all students, with special emphasis on expanded learning experiences for students who are at-risk of academic failure;
- (c) Encourage the use of different and innovative teaching methods;

- (d) Create new professional opportunities for teachers, school administrators and other school personnel;
- (e) Provide parents and students with expanded choices in the types of educational opportunities that are available within the public school system; and
- (f) Provide schools with a method to change from rule-based to performance-based accountability systems by holding the schools established under this article accountable for meeting measurable student achievement results.

The Board of Regents are bound by law, regulation, and Regents-endorsed internal policies regarding the criteria that can be considered when making decisions pertaining to the authorization of new charter schools, charter school renewals, and charter school revisions. Those criteria are set forth in Section 2852(2) of the Education Law:

- (a) Does the charter school described in the application meet the requirements set out in applicable laws, rules and regulations?
- (b) Does the charter school demonstrate the ability to operate the school in an educationally and fiscally sound manner?
- (c) Will approving the charter school action make it likely to improve student learning and achievement and materially further the purposes of the law? and
- (d) In a school district where the total enrollment of resident students attending charter schools in the base year is greater than five percent of the total public school enrollment of the school district in the base year, (i) would granting the application have a significant educational benefit to the students expected to attend the proposed charter school, or (ii) did the school district in which the charter school will be located consent?

The Board of Regents endorsed the Charter School Performance Framework—with its ten academic, organizational, and legal domains—to operationalize the criteria that can be considered when making decisions about the authorization of new charter schools, charter school renewals, and charter school revisions as set forth in Section 2852(2) of the Education Law. Comprehensive data for these benchmark standards are included in all charter school Regents items and summary documents and are discussed at the Regents meeting.

### Performance Framework

The Board of Regents Charter School Performance Framework, which is part of the Board of Regents Charter School Renewal Policy and the Oversight Plan included in the Charter Agreement for each school, outlines three key areas of charter school performance: (1) Educational/Academic Success; (2) Organizational Soundness; and (3) Faithfulness to Charter and Law. The Charter School Performance Framework sets forth ten performance benchmarks in these three areas. The Charter School Performance Framework is designed to focus on performance outcomes, to preserve operational autonomy, and to facilitate transparent feedback to schools. It aligns with the Department's ongoing accountability and effectiveness work under the Every Student Succeeds Act (ESSA) and holds charter schools accountable to standards set forth in the Education Law. Generally, charter schools are required to demonstrate performance outcomes that exceed those of traditional public schools.

**New York State Education Department  
Charter School Performance Framework**

<b>Performance Benchmark</b>	
<b>Educational Success</b>	<b>Benchmark 1: Student Performance:</b> The school has met or exceeded achievement indicators for academic trends toward proficiency, proficiency and high school graduation. At all grade levels and all assessments, scoring proficiently means achieving a performance level of 3 or higher (high school Regents and Common Core Regents exam score of 65 or higher).
	<b>Benchmark 2: Teaching and Learning:</b> School leaders have systems in place designed to cultivate shared accountability and high expectations and that lead to students' well-being, improved academic outcomes, and educational success. The school has rigorous and coherent curriculum and assessments that are aligned to the NYS Learning Standards (NYSLS) for all students. Teachers engage in strategic practices and decision-making in order to address the gap between what students know and need to learn so that all students experience consistent high levels of engagement, thinking and achievement.
	<b>Benchmark 3: Culture, Climate, and Family Engagement:</b> The school has systems in place to support students' social and emotional health and to provide for a safe and respectful learning environment. Families, community members and school staff work together to share in the responsibility for student academic progress and social-emotional growth and well-being. Families and students are satisfied with the school's academics and the overall leadership and management of the school.
<b>Organizational Soundness</b>	<b>Benchmark 4: Financial Condition:</b> The school is in sound and stable financial condition as evidenced by performance on key financial indicators.
	<b>Benchmark 5: Financial Management:</b> The school operates in a fiscally sound manner with realistic budgets pursuant to a long-range financial plan, appropriate internal controls and procedures, and in accordance with state law and generally accepted accounting practices.
	<b>Benchmark 6: Board Oversight and Governance:</b> The board of trustees provides competent stewardship and oversight of the school while maintaining policies, establishing performance goals, and implementing systems to ensure academic success, organizational viability, board effectiveness and faithfulness to the terms of its charter.
	<b>Benchmark 7: Organizational Capacity:</b> The school has established a well-functioning organizational structure, clearly delineated roles for staff, management, and board members. The school has systems and protocols that allow for the successful implementation, evaluation, and improvement of its academic program and operations.
<b>Faithfulness to Charter &amp; Law</b>	<b>Benchmark 8: Mission and Key Design Elements:</b> The school is faithful to its mission and has implemented the key design elements included in its charter.
	<b>Benchmark 9: Enrollment, Recruitment, and Retention:</b> The school is meeting or making annual progress toward meeting the enrollment plan outlined in its charter and its enrollment and retention targets for students with disabilities, English language learners, and students who are eligible applicants for the free and reduced priced lunch program; or has demonstrated that it has made extensive good faith efforts to attract, recruit, and retain such students.
	<b>Benchmark 10: Legal Compliance:</b> The school complies with applicable laws, regulations, and the provisions of its charter.

## Charter School Renewal Application

As stated above, in Article 56 of the Education Law, Section 2852(2) requires the chartering entity (in this case the Board of Regents) to make the following findings when considering a charter renewal application:

- (a) The charter school described in the application meets the requirements set out in this article and all other applicable laws, rules, and regulations;
- (b) The applicant can demonstrate the ability to operate the school in an educationally and fiscally sound manner;
- (c) Granting the application is likely to improve student learning and achievement and materially further the purposes set out in subdivision two of section twenty-eight hundred fifty-one of this article; and
- (d) In a school district where the total enrollment of resident students attending charter schools in the base year is greater than five percent of the total public school enrollment of the school district in the base year, (i) granting the application would have a significant educational benefit to the students expected to attend the proposed charter school, or (ii) the school district in which the charter school will be located consents to such application.

In addition, Renewal Guidelines contained in the Regulations of the Commissioner (8 NYCRR 119.7(d)) were adopted by the Board of Regents and require that the Board further consider the following when evaluating a charter renewal application:

- (a) The information in the charter school's renewal application;
- (b) Any additional material or information submitted by the charter school;
- (c) Any public comments received;
- (d) Any information relating to the site visit and the site visit report;
- (e) The charter school's annual reporting results including, but not limited to, student academic achievement;
- (f) The Department's renewal recommendation and the charter school's written response, if any; and
- (g) Any other information that the board, in its discretion, may deem relevant to its determination whether the charter should be renewed.

## Board of Regents Renewal Policy

The Board of Regents approved renewal policy sets forth the following renewal options and standards:

**Full-Term Renewal:** A school's charter may be renewed for the maximum term of five years. In order for a school to be eligible for a full-term renewal, during the current charter term, the school must have compiled a strong and compelling record of meeting or exceeding Benchmark 1, and at the time of the renewal analysis, have met substantially all of the other performance benchmarks in the Framework.

**Short-Term Renewal:** A school's charter may be renewed for a shorter term, typically of three years. The Regents will place an even greater emphasis on student performance for schools applying for their second or subsequent renewal, which is consistent with the greater time that a school has been in operation and the corresponding increase in the quantity and quality of student achievement data that the school has generated. In order for a school to be eligible for short-term renewal, a school must either: (a) have compiled a mixed or limited record of meeting Benchmark 1, but at the time of the renewal analysis, have met substantially all of the other performance benchmarks in the Framework which will likely result in the school's being able to meet Benchmark 1 with the additional time that short-term renewal permits, or (b) have compiled an overall record of meeting Benchmark 1, but fall far below meeting one or more of the other performance benchmarks in the Framework.

**Nonrenewal:** A school's charter will not be renewed if the school does not apply for renewal or the school fails to meet the benchmark for either full-term or short-term renewal. In the case of nonrenewal, a school's charter will be terminated upon its expiration and the school will be required to comply with the Department's Closing Procedures<sup>1</sup> to ensure an orderly closure by the end of the school year.

### **Related Regents Items**

#### **Charter School of Inquiry**

##### **[June 2014 Initial Charter](https://www.regents.nysed.gov/common/regents/files/614p12a2.pdf)**

(<https://www.regents.nysed.gov/common/regents/files/614p12a2.pdf>)

##### **[Charter School Renewal Policy and Performance Framework](https://www.regents.nysed.gov/common/regents/files/documents/meetings/2012Meetings/November2012/1112p12a1.pdf)**

(<https://www.regents.nysed.gov/common/regents/files/documents/meetings/2012Meetings/November2012/1112p12a1.pdf>)

### **Recommendation**

#### **The State Education Department Renewal Recommendations**

The attached Renewal Recommendation Report provides summary information about the Renewal Application before the Regents for action at its June 2020 meeting, as well as an analysis of the academic and fiscal performance of this school over the charter term.

Pursuant to Education Law §2851(2)(p), charters may be renewed for a charter term of no more than five years. The Department typically makes renewal recommendations for a full term of five years or a short term of three years. The Department may also make recommendations for nonrenewal and has additional flexibility to make renewal recommendations for other charter term lengths.

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<sup>1</sup> The [Department's Closing Procedures](http://www.p12.nysed.gov/psc/regentsoversightplan/sectioni-iv/ClosingProceduresChecklist0220.pdf) can be found on the following webpage:  
<http://www.p12.nysed.gov/psc/regentsoversightplan/sectioni-iv/ClosingProceduresChecklist0220.pdf>.

The Department considers evidence related to all ten performance benchmark areas of the Charter School Performance Framework when making recommendations to the Regents concerning charter renewal applications. However, student academic performance is of paramount importance when evaluating each school.<sup>2</sup> The recommendations below were made after a full due-diligence process over the charter term, including review of the information presented by the schools in their Renewal Applications; specific fiscal reviews; a renewal site visit of up to two days, conducted by a Department team for each school; comprehensive analysis of achievement data; and consideration of public comment. Over the course of the charter term, the Department closely monitors all charter schools based on the Oversight Plan.<sup>3</sup>

### Renewal Recommendation

It is recommended that the Board of Regents take the following action:

VOTED: That the Board of Regents finds that the **Charter School of Inquiry**: (1) meets the requirements set out in Article 56 of the Education Law, and all other applicable laws, rules and regulations; (2) the applicant can demonstrate the ability to operate the school in an educationally and fiscally sound manner; (3) granting the application is likely to improve student learning and achievement and materially further the purposes set out in subdivision two of section twenty-eight hundred fifty of this article; and (4) granting the application would have a significant educational benefit to the students expected to attend the charter school, and the Board of Regents therefore approves the renewal application of the **Charter School of Inquiry** and that a renewal charter be issued, and that its provisional charter be extended for a term up through and including **June 30, 2022**.

### Timetable for Implementation

The Regents action for the above-named charter school will become effective immediately.

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<sup>2</sup> See [8 NYCRR §119.7](http://www.p12.nysed.gov/psc/aboutcharterschools/Financing/Regulations/csreg119.7.html) at <http://www.p12.nysed.gov/psc/aboutcharterschools/Financing/Regulations/csreg119.7.html>

<sup>3</sup> The [Oversight Plan for Board of Regents-Authorized Schools](http://www.p12.nysed.gov/psc/regentoversightplan/OversightPlan.html) is located on the following webpage: <http://www.p12.nysed.gov/psc/regentoversightplan/OversightPlan.html>

## Charter School of Inquiry

In accordance with Education Law, Article 56, Sections 2851(4) and 2852(2), Commissioners Regulation 119.7, and the Board of Regents Charter School Renewal Policy, the **New York State Education Department recommends a short-term renewal for a period of two years for the Charter School of Inquiry. The charter term would begin on July 1, 2020 and expire on June 30, 2022.** In January 2019, the school was required by NYSED to provide a Corrective Action Plan (CAP) to increase proficiency rates on the NYS ELA and math 3-8 assessments and to increase enrollment of students with disabilities (SWDs) and English language learners (ELLs)/Multilingual learners (MLLs). In spring 2020, the school was also required by NYSED to provide a Corrective Action Plan (CAP) to increase enrollment of SWDs and ELLs/MLLs. The school is currently implementing the specific strategies outlined in the CAP and provides quarterly progress reports and updates to the NYSED Charter School Office (CSO). The CAP will be closely monitored, and the Department will report to the Regents as necessary.

The Charter School of Inquiry is meeting three out of the 10 benchmarks set forth in the Board of Regents Charter School Performance Framework. The school is not yet fully implementing the mission, key design elements, education program, and organizational plan set forth in the charter.

This is the first renewal for this school. As such, pursuant to the Board of Regents renewal policy, academic outcomes are not emphasized to the same extent as in subsequent renewals. In addition, the school has “compiled a mixed or limited record of meeting Benchmark 1,” and the Department believes that the intensive school turnaround plan currently being implemented by the school “will likely result in the school being able to meet Benchmark 1 with the additional time that short-term renewal permits.” Therefore, pursuant to the Board of Regents approved renewal policy, the Department is recommending a short-term renewal.

### Charter School Summary

<b>Name of Charter School</b>	Charter School of Inquiry
<b>Board Chair</b>	Helene Kramer
<b>District of Location</b>	Buffalo Public Schools
<b>Opening Date</b>	Fall 2015
<b>Charter Term(s)</b>	Initial term: August 24, 2015 - June 30, 2020
<b>Current Term Authorized Grades/Approved Enrollment</b>	K-Grade 6/350 students
<b>Proposed Renewal Term Authorized Grades/Proposed Approved Enrollment</b>	K-Grade 6/350 students
<b>Facilities</b>	404 Edison Avenue, Buffalo NY – Private Space
<b>Mission Statement</b>	<i>The Charter School of Inquiry is an innovative school where children achieve breakthrough outcomes by pursuing questions, thinking creatively and learning together as a culturally empowered community.</i>
<b>Key Design Elements</b>	<ul style="list-style-type: none"> <li>• Rigorous, Inquiry-based Curriculum</li> <li>• Academic Focus on Literacy</li> <li>• Responsive Classroom</li> <li>• Collaborative Team-Teaching</li> <li>• Data-driven Instruction</li> <li>• African/African American History and Culture</li> </ul>
<b>Recommended Material Revisions</b>	None

**Noteworthy:** Charter School of Inquiry (CSI) proposes to help students “gain a better understanding of African and African American people and their contributions to the world.” The school has created a list of lesson plan topics through which African and African American people, history and events can be infused into lessons.

**Innovative Programs:** One of the school’s key design elements stands out as unique: the understanding of African and African American history and culture as infused into the social studies curriculum. This understanding is important for all children in order to instill cultural responsiveness in their learning.

**Renewal Conditions:** CSI shall devise and implement a weighted lottery in consultation with the NYSED CSO for students with disabilities and English language learners/Multilingual learners no later than the 2020-2021 school year.

**Current Grade Levels and Approved Enrollment**

	<b>Year 1 2015 to 2016</b>	<b>Year 2 2016 to 2017</b>	<b>Year 3 2017 to 2018</b>	<b>Year 4 2018 to 2019</b>	<b>Year 5 2019 to 2020</b>
<b>Grade Configuration</b>	K- Grade 2	K- Grade 3	K- Grade 4	K- Grade 5	K- Grade 6
<b>Total Approved Enrollment</b>	98	200	250	300	350

**Proposed Renewal Term Grade Levels and Proposed Enrollment\***

	<b>Year 1 2020 to 2021</b>	<b>Year 2 2021 to 2022</b>	<b>Year 3 2022 to 2023</b>	<b>Year 4 2023 to 2024</b>	<b>Year 5 2024 to 2025</b>
<b>Grade Configuration</b>	K- Grade 6				
<b>Total Proposed Enrollment</b>	332	344	350	350	350

\*The proposed chart was submitted by the Charter School of Inquiry in its renewal application. It is subject to change pending the final renewal recommendation and approval by the Board of Regents.

## Summary of Evidence for Renewal

### Key Performance Area: Educational Success

#### **Student Performance – Elementary/Middle School Outcomes**

See Figure 1 regarding assessment proficiency for 3-8 math and ELA. See Table 1 below for 3-8 math and ELA exam aggregate and subgroup student performance compared to the district and State average, which serve as two of the many indicators in Benchmark One of the Charter School Performance Framework. **According to the 2018-2019 school year ESEA accountability designations, the Charter School of Inquiry is a *School in need of Comprehensive Support and Improvement*.**

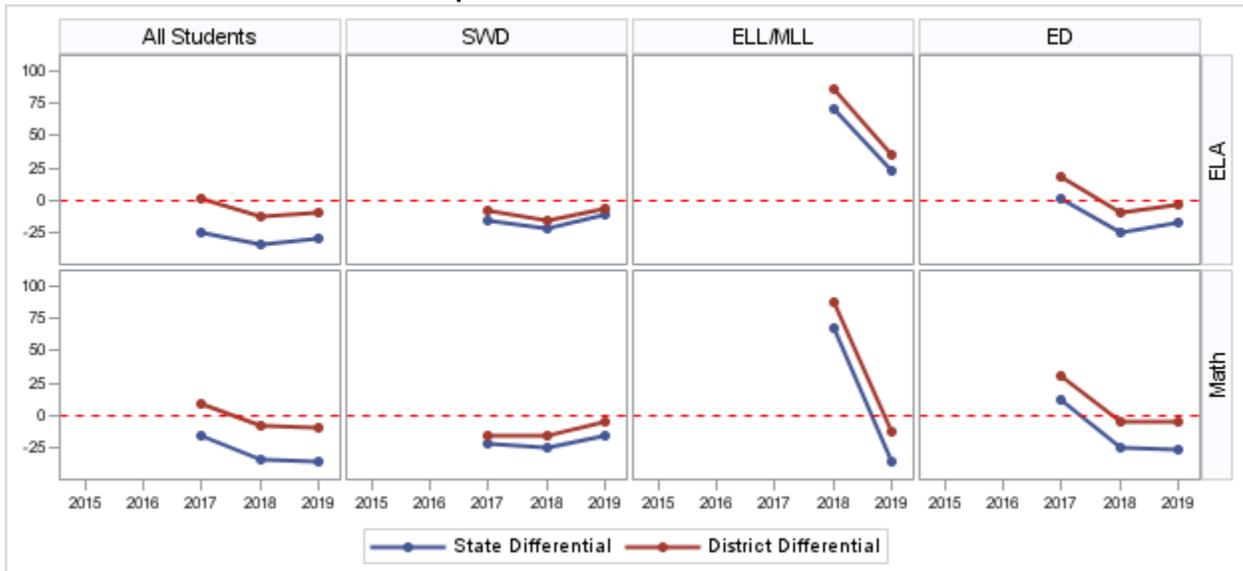
**Academic Program for Elementary School/Middle School:**

CSI assigns two adults to each classroom, a lead teacher and a teaching assistant. To provide additional learning time and small group instruction, students are scheduled for two periods of ELA and two periods of math each day, one of which is designated “workshop.” Students needing academic support meet with interventionists and special educators during workshop time. In 2019-2020, the school changed its ELA curriculum from the Engage NY modules to *Open Court*. The math curriculum changed in 2019-2020 and currently consists of *Math Expressions* and *Do the Math*. Teachers use the *Full Option Science System (FOSS)* program for science instruction, and teachers are expected to infuse African and African American history and culture topics into the Engage NY social studies modules. In addition to ELA, math, science and social studies, CSI students have music, art, and physical education on an alternating schedule.

**Academic Program for Students with Disabilities (SWDs) and English language learners (ELLs)/Multilingual Learners (MLLs):**

The school employs a consultant teacher (CT) model to support its SWDs. An English as a New Language (ENL) teacher pushes into classrooms to work with the ELL/MLL students enrolled at CSI.

**Figure 1: Elementary/Middle School Assessment Proficiency Outcomes Over Time Comparison to Buffalo Public Schools**



**Table 1: Elementary/Middle School Assessment Proficiency**

		ELA					Math				
		CS of Inquiry	Buffalo Public Schools	Differential to District	NYS	Differential to NYS	CS of Inquiry	Buffalo Public Schools	Differential to District	NYS	Differential to NYS
All Students	2016-2017	19%	18%	+1	43%	-24	32%	22%	+10	48%	-16
	2017-2018	16%	28%	-12	49%	-33	17%	25%	-8	51%	-34
	2018-2019	17%	26%	-9	46%	-29	14%	23%	-9	50%	-36
SWD	2017-2018	0%	16%	-16	21%	-21	0%	16%	-16	24%	-24
	2018-2019	7%	13%	-6	17%	-10	7%	12%	-5	22%	-15
ED	2016-2017	33%	14%	+19	32%	+1	50%	19%	+31	37%	+13
	2017-2018	15%	24%	-9	39%	-24	16%	21%	-5	40%	-24
	2018-2019	19%	22%	-3	36%	-17	14%	19%	-5	40%	-26

### Key Performance Area: Organizational Viability

#### Financial Condition

In 2017, the Office of the State Comptroller (OSC) conducted an [audit of the school](http://www.osc.state.ny.us/localgov/audits/schools/2017/charter-inquiry.htm) (<http://www.osc.state.ny.us/localgov/audits/schools/2017/charter-inquiry.htm>) with the purpose to examine student enrollment and billing processes for the period July 1, 2015 thru February 2, 2017. The findings were:

- The school must follow its policies and procedures properly;
- The school must follow its internal controls systems properly;
- Arrange for access to 2015-2016 student attendance records from the previous student data management software vendor; and
- Ensure the school complies with SED regulations for records retention and disposition.

The school agreed with the audited financial findings and submitted a corrective action plan to OSC to address them.

The Charter School of Inquiry appears to be in strong financial condition as evidenced by performance on key indicators derived from the school's independently audited financial statements.

The Charter School Office reviews the financial performance and management of charter schools using quantitative and qualitative methods. Near-term indicators, such as the current ratio and unrestricted days cash, are measures of liquidity and of the charter school's capacity to maintain operations. Long-term indicators, such as total margin and debt-to-asset ratio, are measures of the charter school's capacity to remain viable and to meet financial obligations.<sup>4</sup>

A *composite score* is an overall measure of financial health. This score is based on a weighting of primary reserves, equity, and net income. A charter school with a score between 1.5 and 3.0 is considered to be in strong financial health. The Charter School of Inquiry's composite score for 2018-2019 is 3.00. Table 2 shows the school's composite scores from 2015-2016 to 2018-2019.

<sup>4</sup> These rigorous indicators of fiscal soundness are aligned with those recommended by the National Association of Charter School Authorizers.

**Table 2: Charter School of Inquiry’s Composite Scores  
2015-2016 to 2018-2019**

<i>Year</i>	<i>Composite Score</i>
2015-2016	.95
2016-2017	2.41
2017-2018	2.93
2018-2019	3.00

**Financial Management**

The Charter School Office reviewed the Charter School of Inquiry’s 2018-2019 audited financial statements to determine whether the independent auditor observed sufficient internal controls over financial reporting. The auditor did not identify any deficiencies in internal controls that could be considered material weaknesses.

**Key Performance Area: Faithfulness to the Charter and Law**

**Enrollment, Recruitment and Retention**

CSI will admit up to 50 children at each grade level, kindergarten through Grade 6. In all grades, preference is given to children who are currently enrolled, siblings of students currently enrolled, children of full-time teachers currently employed at the Charter School of Inquiry, and children residing in the City of Buffalo. In the event there are more applications than vacant seats, CSI holds a public lottery within two weeks of the application due date. Notification of the lottery is given at least one week prior to the lottery, which is publicized as a public event and is overseen by a neutral third party to ensure that it is just and fair. When capacity is reached at a given grade level, names will be placed on a waiting list, which is kept for the current school year only.

Through efforts toward increasing the percentage of at-risk students enrolled, the school is coming close to but not yet meeting its targets for all the special population subgroups – economically disadvantaged students (EDs), SWDs, or ELLs/MLLs. Enrollment of SWDs, ELLs/MLLs, and EDs is mostly stable, with little fluctuation from one year to another.

The school is making good faith efforts to recruit, serve, and retain at-risk students<sup>5</sup>. Efforts to recruit and retain students in the ED, ELL/MLL, and SWD populations include:

- The school contracted with a marketing company in 2017-2018 to upgrade its marketing and recruitment materials;

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<sup>5</sup> Education Law §2854(2)(a) requires that schools demonstrate good faith efforts to attract and retain a comparable or greater enrollment of students with disabilities, FRPL-eligible students and English language learners when compared to the enrollment figures for such students in the school district in which the charter is located. SUNY and the Regents were charged with setting specific enrollment and retention targets for each charter school and have done so. Education Law §2852(9-a)(b)(i). All charter schools that were initially chartered after August 2010 or renewed after January 1, 2011, are expected to meet or exceed the enrollment and retention targets set by the Regents and SUNY. When submitting an application for renewal of the charter, schools are required to provide information detailing the means by which they will meet the enrollment and retention targets (Education Law §2851(4)(e)), and this information is considered by the Regents in the review of the school’s performance over the charter term. A school’s plan to change its enrollment practices, whether by weighting the lottery or preferencing, may also be considered when determining whether the school will meet the targets in the upcoming charter term. A school’s repeated failure to meet or exceed its enrollment and retention targets, when combined with a failure to show that extensive efforts to meet the targets have been made, may be cause for termination or revocation of the charter pursuant to section Education Law §2855(1)(e).

- The school contracted with an area agency to provide translation services to facilitate outreach to families with limited English skills; and
- Funding is provided in the budget for recruitment purposes, but the school has yet to develop a strategic plan for its use.

**Table 3: Student Demographics Comparison to Buffalo Public Schools**

	SWD			ELL/MLL			ED		
	CS of Inquiry	Buffalo Public Schools	Differential to District	CS of Inquiry	Buffalo Public Schools	Differential to District	CS of Inquiry	Buffalo Public Schools	Differential to District
<b>2015-2016</b>	11%	25%	<b>-14</b>	1%	17%	<b>-16</b>	88%	86%	<b>+2</b>
<b>2016-2017</b>	9%	24%	<b>-15</b>	0%	19%	<b>-19</b>	48%	83%	<b>-35</b>
<b>2017-2018</b>	13%	24%	<b>-11</b>	0%	22%	<b>-22</b>	96%	85%	<b>+11</b>
<b>2018-2019</b>	12%	25%	<b>-13</b>	2%	24%	<b>-22</b>	92%	87%	<b>+5</b>

**Table 4: Retention – Aggregate and Subgroups**

	All Students			SWD			ELL/MLL			ED		
	Charter School of Inquiry	Buffalo Public Schools	Differential to District	Charter School of Inquiry	Buffalo Public Schools	Differential to District	Charter School of Inquiry	Buffalo Public Schools	Differential to District	Charter School of Inquiry	Buffalo Public Schools	Differential to District
2016-2017	68%	87%	<b>-19</b>	45%	87%	<b>-42</b>	0%	89%	<b>-89</b>	68%	88%	<b>-20</b>
2017-2018	74%	87%	<b>-13</b>	64%	88%	<b>-24</b>	.	.	.	83%	88%	<b>-5</b>
2018-2019	69%	87%	<b>-18</b>	61%	88%	<b>-27</b>	100%	88%	<b>+12</b>	70%	87%	<b>-17</b>

### Legal Compliance

The Charter School of Inquiry generally operates in accordance with applicable law, regulations, rules and other policies, including the terms of its charter, its by-laws and other school-specific policies. It is also in compliance with federally mandated disciplinary procedures for students with disabilities, and the Dignity for All Students Act. However, there is no evidence of public notice of committee meetings, as required by Open Meetings Law. While the board’s by-laws state that committee minutes will be kept, there is no public posting of those records on the school’s website. NYSED is working with the school to update its policy documents.

### Summary of Public Comment

The required public hearing was held by the Buffalo Public Schools on October 2, 2019. Forty-five people attended, and four people spoke. All four were in favor of the renewal and none were opposed.