



EDUCATION VOTERS
of Pennsylvania

FIXING — THE — FLAWS

IN PA'S SPECIAL EDUCATION FUNDING SYSTEM

FOR CHARTER SCHOOLS:

HOW AN OUTDATED LAW
WASTES PUBLIC MONEY,
ENCOURAGES GAMING THE SYSTEM,
AND LIMITS SCHOOL CHOICE

**Fixing the Flaws in Pennsylvania's
Special Education Funding System for Charter Schools:
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Gaming of the System, and Limits School Choice**



June 2020

"The current charter school funding mechanism provides charter schools the same funding for each student with a disability, regardless of the severity of that student's disability. This creates a strong incentive to over-identify students with less costly disabilities and... under enroll students with severe, or more costly, disabilities. A student with a mild disability can be a financial boon to a charter school, given that the funding the charter receives will exceed the charter's costs to educate the child. In contrast, when a charter school does enroll a student with a severe disability the funding may be inadequate. This creates a disincentive for charters to serve students with severe disabilities."

- David Lapp, Education Law Center, 26 Sept. 2013
[p.49, Special Education Funding Commission Report]

Acknowledgments

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About Education Voters of PA

Education Voters of PA is a statewide, nonpartisan, nonprofit organization that was established in 2007 to promote a pro-public education agenda with elected leaders and the public. We believe that all children, no matter their ZIP code, have a fundamental right to a quality public education that will provide them with opportunities to succeed in school and to realize their potential as engaged citizens after graduation. Our work focuses on securing adequate and equitable state funding for public education and promoting sound education policy that will help eliminate deep disparities in access to quality educational resources that leave low-income students and students of color behind. Education Voters of PA is a project of the Keystone Research Center.

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Fixing the Flaws in Pennsylvania’s Special Education Funding System for Charter Schools: How an Outdated Law Wastes Public Money, Encourages Gaming of the System, and Limits School Choice

Executive Summary

- \$** Pennsylvania has two different systems for paying for special education services for public school students. In school districts, funding is based on a Special Education Funding Formula (SEFF) that differentiates students into cost tiers according to their levels of educational need. Special education for charter schools is funded according to an outdated formula that pays the same tuition per student for each student from a school district, regardless of the cost of that student’s needs. This difference is unequal, unfair, and wastes millions of dollars.
- \$** The divisor of the existing, outdated formula for calculating special education tuition rates implicitly assumes that 16% of each district’s students should receive special education services, but studies show most school districts have substantially more: the statewide average is 19.9%. This means that typical school districts are paying charter schools nearly 25% more per special education student than their own per-student district average.
- \$** A “one-size-fits-all” special education funding calculation does not accurately reflect the real costs of educating students with disabilities. Fixing the 16% calculation would save taxpayers approximately \$65 million per year.
- \$** The charter school funding system creates an incentive to cherry pick students with low-cost special education needs and discriminate against students with high-cost needs.
- \$** Using data from PA’s Department of Education, we find that statewide there are about half as many students in the two highest service tiers as would be expected in a non-biased system. The pattern is similar or worse in each of the regions we analyzed.
- \$** Enrollment patterns in special education tiers are consistent with the likelihood that many charter schools are exploiting the funding system by cherry picking students with low-cost special education needs and discriminating against students with high-cost needs. The additional cost to Pennsylvania taxpayers is approximately \$100 million.
- \$** Pennsylvania already has a way of addressing this problem, by applying the tiered Special Education Funding Formula (SEFF) to charter schools. This, combined with a cap on basic tuition rates for cyber charter schools, could save the state over \$230 million annually.
- \$** We recommend charter school funding reforms that include these two core elements — capping tuition rate for cyber charter tuition and applying a tiered funding system to charter school special education tuition — be enacted by the Pennsylvania legislature.

Two core values should drive decisions about how special education is funded in Pennsylvania: (1) our children, especially whether they are receiving the educational opportunities they need and deserve through our educational system, and (2) whether taxpayer money is being spent wisely and fairly to provide those educational opportunities or whether it is being squandered. Our current funding of special education in charter schools is failing both of those values.

In 2013 a Special Education Funding Commission (SEFC) investigated problems in the outdated, flawed, and inequitable system of funding special education in Pennsylvania. They recommended a new, more equitable, cost-based, and tiered Special Education Funding Formula (SEFF), intended to better meet the needs of students and schools, and more accurately distribute state funding based on actual costs of providing special education and related services to students with varying needs.¹

In 2015, a new funding formula closely based on the commission's recommendation was enacted.² It applied to all new special education funding for public school districts.³ The SEFC had recommended the new formula also be applied to charter schools, but that did not happen. Instead, the charter school lobby was successful in exempting charter schools from the new formula.

In 2019, further educational funding reforms were proposed. These include a cap on tuition to cyber charter schools, and revisiting the issue of applying the three-tier SEFF to charter schools. These reforms are now being considered by the Pennsylvania state legislature, and would eliminate over \$230 million dollars in wasteful spending, saving taxpayer money, and should improve school choice opportunities for students with the greatest special education needs.⁴ It is the right thing to do.

For the reasons expounded below, Education Voters of PA recommends that the three-tier funding formula for special education be applied to charter schools. It will replace the existing "one size fits all" funding calculation that has little basis in actual special education costs with an approach grounded in the actual costs of special education.

What are Charter Schools?

Charter schools are schools authorized to operate independently of local school districts. They are run by private non-profit boards of directors. They came into existence in Pennsylvania in 1997 with enactment of the Pennsylvania Charter School Law. In 2002, the law was amended to include cyber charter schools, which are authorized by the Pennsylvania Department of Education and enroll students from school districts throughout the Commonwealth. Cyber charter schools educate students

¹ Special Education Funding Commission Report (2013). www.senatorbrowne.com/wp-content/uploads/sites/37/2015/05/Special-Education-Funding-Commission-Report-121113.pdf

² While the portion of school district funding distributed under the new formula is still a small fraction of all funding, over time the system should become increasingly equitable.

³ See www.pasbo.org/specialeducation

⁴ www.education.pa.gov/K-12/Charter%20Schools/CharterPolicyReform/Pages/LegisProposal.aspx

via the internet, which allows them to operate statewide, and makes their costs to educate children much less than regular charter schools and district schools. In Pennsylvania, cyber charter schools have a poor track record on academic performance.⁵

How are Charter Schools Funded?

Both kinds of charter schools are publicly funded. Section 1725-A of the Pennsylvania Charter School Law mandates both that charter schools cannot charge tuition fees directly to their students and that school districts must make tuition payments to charter schools for students who live in their districts but attend charter schools. The payments are not related in any way to the costs of education or other services incurred by the charter schools, but rather based on costs incurred by the school district for its students. Each district pays the charter school a per-student tuition rate based on the school district's average expenditure per student, excluding costs for services not provided by the charters.⁶

As Education Voters of PA showed in a prior paper, this means of funding is especially problematic with regard to cyber schools because cyber education is far cheaper than education in “brick and mortar” schools. As a result, taxpayers are wasting hundreds of millions of dollars overfunding cyber charter schools, relative to the actual costs of the education they provide. To pay these costs, school districts must raise taxes or reduce resources available to non-charter students. This harms students and taxpayers.⁷ Accordingly, Governor Wolf has proposed a statewide cap on tuition rates for cyber charter schools.

What is Special Education?

Under the Individuals with Disabilities Act, public school students with disabilities are legally entitled to a free and appropriate education (FAPE), in the least restrictive environment. School districts must provide students with disabilities with instruction that is modified to meet their unique needs and the supports and services necessary to help them reach their potential. Special education is “specially designed instruction”, i.e. adapted content, methods, media, and/or delivery of material to fit a child's learning needs, and related services deemed necessary to provide this education.⁸

Different types of disability can impact education. Some disabilities are physical, e.g. blindness, deafness, speech impairments, orthopedic disabilities, etc. Others are intellectual, including learning disabilities, brain injuries, etc. Still others include autism and emotional disturbances.⁹

⁵ See www.paschoolperformance.org/Downloads.html, credo.stanford.edu/pdfs/Online%20Charter%20Study%20Final.pdf, and www.thefinancialinvestigator.com/wp-content/uploads/2012/02/PA-State-Report_20110404_FINAL.pdf

⁶ Section 1725-A of the Pennsylvania Charter School Law, Paragraph 3.

⁷ “Commonsense Cyber Charter School Funding Reform Will Eliminate Wasteful Spending and Save \$290 Million in Taxpayer Money”. educationvoterspa.org/wp-content/uploads/2019/09/Final-Ed-Voters-September-2019-Report.pdf

⁸ Special Education Funding Commission Report (2013), p. 15. www.senatorbrowne.com/wp-content/uploads/sites/37/2015/05/Special-Education-Funding-Commission-Report-121113.pdf

⁹ Ibid. p. 17.

How much does Special Education Cost?

Special education costs more than general education, because of the needed accommodation, which may include medical, speech and audiology, guidance, and psychological services, as well as social work and special transportation. Special education also requires teachers with specialized training, and often requires special educational technology, or even modifications to classrooms or other facilities. How much special education costs varies greatly across districts because of differences between districts and their specific populations of students who need special education, and within districts because student needs vary greatly.

To better match funding with the cost of services for students' disabilities, the PA Special Education Funding Formula (SEFF) categorizes special education into three categories or tiers, although the third tier is effectively divided in two.¹⁰ Each tier is defined by the additional costs per student of providing special education services. The dollar values defining each tier increase annually.¹¹ For the 2018-19 school year the thresholds between tiers were: Tier 1 to 2 at \$25,885, up from \$25,628 in 2017-18; Tier 2 to 3 at \$51,769, up from \$51,257 in 2017-18; Tier 3A to 3B at \$77,654, up from \$76,885 in 2017-18.¹²

Each tier has a multiplier in the funding formula: 1.51, 3.77, and 7.46, respectively. These provide a crude sense of how many times more expensive each tier is relative to general education. The distribution is highly skewed. The first tier includes about 90% of students receiving special education, the second about 7% of those students, while 3A and 3B combined constitute about 3% of students receiving special education.¹³ Costs vary broadly by disability type, but also vary greatly within each type, depending on the severity of the disability and idiosyncratic needs of each individual child.¹⁴ Because of this it is counterproductive and wasteful to try to tie funding to type of disability.¹⁵

Different Rules for Different Schools

Since the SEFF was enacted for public school districts but charter schools successfully lobbied to be exempted, there has been a discrepancy between the two in how special education is funded. Charter schools are not playing by the same rules. While the SEFF ties new funding to its tiers, based broadly on variation in actual costs, charter schools continue under a flawed and outdated system.

¹⁰ Act 3 specified three tiers, but application of Extraordinary Costs Fund divides the third tier, a distinction recognized in district reporting under Act 16 of 2000. The two parts are sometimes labeled 3A and 3B, other times 3 and 4. See Special Education Funding Commission Report (2013), p. 6, 36.

¹¹ Act 16 Expenditures per Student Guidance, a.k.a. "Act 16 Guidelines". PA Dept. of Education. www.education.pa.gov/K-12/Special%20Education/FundingGrants/Pages/Act16.aspx and PA Department of Education Handout pdf from 25 February 2015, penndata.hbg.psu.edu/Portals/66/resource-guides/2014/ACAPA_Presentation-Feb.25.2015_Handout.pdf

¹² www.education.pa.gov/K-12/Special%20Education/FundingGrants/Pages/Act16.aspx

¹³ Based on Act 16 Data for 2018-19 for each PA School District, reported by PA Department of Education.

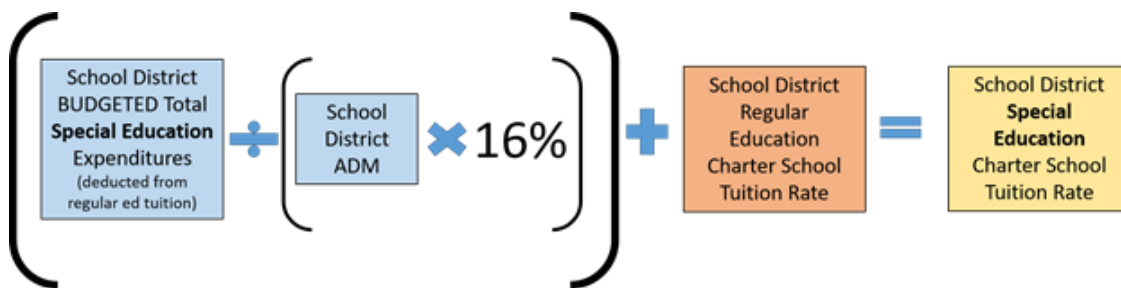
¹⁴ Total Expenditures for Students with Disabilities, 1999-2000: Spending Variation by Disability (2003). Special Education Expenditure Project (SEEP). www.air.org/sites/default/files/SEEP5-Total-Expenditures.pdf

¹⁵ Special Education Funding Commission Report (2013), pp. 35, 44. www.senatorbrowne.com/wp-content/uploads/sites/37/2015/05/Special-Education-Funding-Commission-Report-121113.pdf

How is Charter School Special Education Funded?

Charter schools receive additional money for special education students, above the base tuition rate for general education. This additional funding is also not based on what it costs the charter school to educate special education students. It is calculated as the total special education expenditure of the school district from which the kids are drawn, divided by 16% of the school's average daily membership (ADM), using data from the prior academic year.¹⁶

The total charter school tuition rate per student for any given school district is the sum of their regular education charter school tuition rate, plus this extra funding. Across Pennsylvania school districts, this varies from about \$15,000 to over \$48,000 extra per student.¹⁷ The extra, special education portion is represented by the portion of this equation within the brackets here:



Source: <https://www.pasbo.org/dailydata-april3>

Why does the Divisor Matter?

In dividing total special education spending by sixteen percent of average daily membership (ADM), the formula assumes the portion of students receiving special education should be very near 16% in each school district. If districts have a larger percentage, their total spending is spread across more students so their per-student spending is actually less than the formula assumes. Thus, the special education portion of the tuition rate they pay to charter schools will be inflated. Conversely, if the percentage is less than 16%, they pay a lower tuition rate than what they actually spend per student. Conceptually, the ratio of the special education portion of charter school tuition rate to per-student spending is the ratio of the percentage of students who receive special education divided by 16 percent.¹⁸

¹⁶ 16% is specified by Section 2509.5 of Pennsylvania Special Education Funding Law.

¹⁷ 2017-2018 PA Dept. of Education data, omitting the unusual high-end outlier of Byrn Athyn School District.

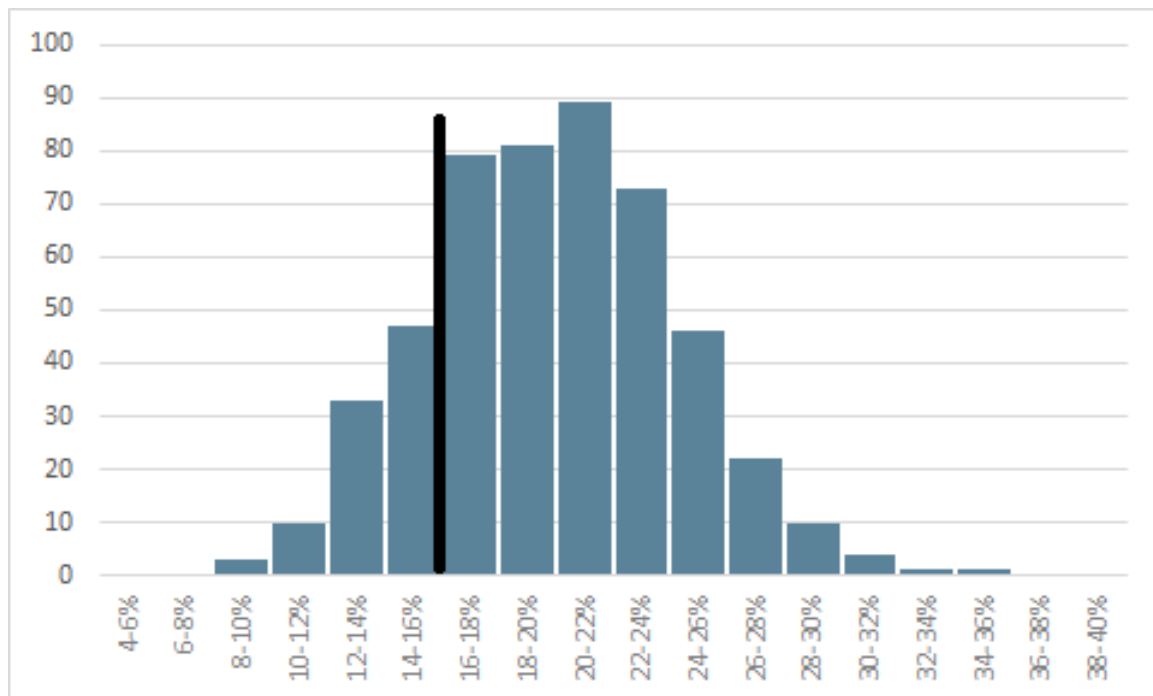
¹⁸ Let T_+ represent the special education portion of charter school tuition, X represent a district's total special education spending, with \bar{X} being the per student average, and P represent the proportion of students receiving special education. $T_+ = X / (.16 \cdot ADM)$, while $\bar{X} = X / (P \cdot ADM)$. The ratio $T_+ / \bar{X} = [X / (.16 \cdot ADM)] / [X / (P \cdot ADM)]$ reduces to $[1 / (.16 \cdot ADM)] / [1 / (P \cdot ADM)]$ and thus $(P \cdot ADM) / (.16 \cdot ADM) = P / .16$. Calculated tuition may vary somewhat from this conceptual function, due to exemptions for certain kinds of special education expenses and/or the use of adjusted ADM values.

In an example school district, 2018-19 charter tuition for special education tuition was \$18,310 above base tuition (\$33,484 vs. \$15,174) and the ADM was 4853.15 in 2017-18, with 965 (19.88%) special education students. Multiplying ADM of 4853.15 by the divisor of 16% by the special education portion of the tuition rate \$18,310 yields a product of \$14,217,761. This is the school district's estimated total special education spending. Divided by 965 students that is a per student average of \$14,733. The special education part of charter tuition is \$3,577 dollars above \$14,733. The ratio of 19.88% to 16% is 1.247 which is also the ratio of \$18,310 divided by \$14,733.

Most PA School Districts Pay Charters More than their Per-Student Special Education Spending

In 2017-18 the median and mean percentage of students receiving special education across school districts in Pennsylvania were each about 19.9%.¹⁹ A median almost 125% of the divisor means typical school districts in Pennsylvania pay nearly 25% more in the special education portion of charter school tuition than their own per-student average spending on special education.

Figure 1. Percentage of Students Receiving Special Education in PA School Districts, 2017-18²⁰



¹⁹ Total Count of Special Education students, including those attending charter schools, divided by Total ADM. Data from "Proposed Special Education Funding" Spreadsheet www.education.pa.gov/Teachers%20-%20Administrators/School%20Finances/Education%20Budget/Pages/default.aspx (N=499) Bryn Athyn School District excluded. This result is very similar to that reported by PA Association of School Business Officials (PASBO) www.pasbo.org/16percent

²⁰ Because relative over- or under-payment is a function of this percentage, this graph is also the distribution of PA school districts by the percentage of over- or under-payment, except that the x-axis labels would need to be converted. 32% equals 100% overpayment; 24% equals 50% overpayment; 16% is no overpayment; 8% equals 50% underpayment.

Figure 1 illustrates the problem further. The height of each blue bar represents the number of school districts whose percent of students receiving special education is in the range below it. The vertical black line represents the 16% divisor. The central tendency of the distribution and about four of every five school districts is to the right of the black line. In 406 districts the percentage of students receiving special education is 16% or higher, meaning they are overpaying charters for special education relative to their district average. There are only 93 districts where the percentage is under 16%.²¹

The percentage of students receiving special education in districts at the right tail of the distribution is about twice the 16% divisor, meaning the special education portion of their charter school tuition rate is about twice their per student special education spending on their own students!

How Much Money does this Waste?

One can tell to what extent a school district overpays or underpays charters, as a percentage of their per student average spending on special education, simply by comparing the percent of students receiving special education in the district to the 16% divisor, but calculating the corresponding dollar figure requires at least a good estimate of special education expenditure data. We can estimate each district's adjusted total special education expenditure by reversing the tuition formula, but taking the adjustments into consideration is beyond the scope of this paper. Fortunately, the Pennsylvania Association of School Business Officials (PASBO) has published such an analysis. They found the sum of overpayment across districts was about \$65 million, while total underpayment was only \$4 million, implying a net cost to taxpayers of about \$65 million each year.²²

Can Any Single Divisor Cover the Variation in the Distribution?

No. Moving the divisor line may help or hurt particular districts, but it does not change the spread or shape of the distribution. No system using a single divisor will suffice to cover its range. A simple and fairer solution is for districts to divide by the actual number of students receiving special education services. This would mean that the special education portion of tuition that charters received for a student from any given school district would equal the average amount of money the district spent on special education and related services for its other students who receive those services.

Looking at Costs in Dollars

Matching the special education portion of charter school tuition rates with each district's average per student special education spending is not the same as matching it with the actual costs of providing special education. To compare costs between different school districts, or between different students, we must look at costs in dollars, rather than as a distribution of percentages.

²¹ This result is also very similar to that reported by PASBO. www.pasbo.org/16percent

²² www.pasbo.org/16percent In connection with that analysis, PASBO also published estimates of how much each Pennsylvania school district would save, or lose, if each school divided based on the percentage of their students who actually receive special education services, rather than on 16%. Readers interested in knowing how much a specific school district could save should visit [https://www.pasbo.org/files/PASBO%20Act%2016%20Count%20Amendment\(1\).pdf](https://www.pasbo.org/files/PASBO%20Act%2016%20Count%20Amendment(1).pdf)

Figure 2. Average School District Special Education Spending Per Student vs. Charter Tuition

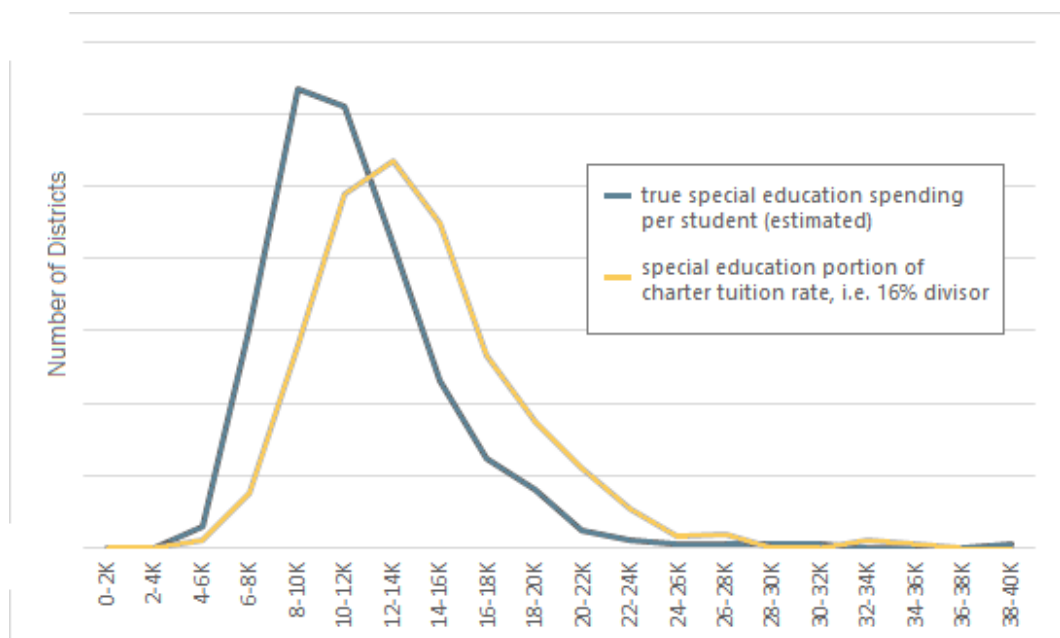


Figure 2 shows the gap in dollars, across PA school districts. The gold curve is the special education portion of tuition to charter schools, i.e. difference between special education and general education tuition rates. The blue curve is the estimated per student special education spending, i.e. estimated total special education expenditure divided by each districts’ actual percentage of students who receive special education.²³

Cost Variation Between and Within School Districts

Each district’s per-student special education spending, and thus the variation between school districts shown in Figure 2, is shaped by a number of factors, including the costs of hiring special education teachers and service providers and differences in the mix of students who receive special education and in their educational needs, among other things. This variety of factors makes per-student average special education funding a conceptually complex and inconvenient basis for a funding formula, even before considering variation of costs within districts.

Moreover, the costs of special education vary enormously within school districts, due largely to different special education needs, depending on the severity and other details of each student’s disability. Variation in the costs of providing special education to different students in the same school district challenges the appropriateness of a funding system that does not consider the mix of students in a district.

²³ Total special education spending is estimated as 2017-18 ADM multiplied by 16% multiplied by the special education portion of the tuition rate, i.e. the difference between special and non-special tuition rates. That is then divided by the reported number of students receiving special education to obtain estimated per student special education spending.

Applied to charter school funding, such systems imply that costs of special education should be similar for each student in a given school district. This assumption is deeply flawed. These costs are heavily skewed, with a few students needing several times the funding that most students require.²⁴ Funding charter schools based on the district per student average means wasting money on most students and not providing enough for other students, and creates an incentive for charters to game the system, described in more detail later in this paper.

Likewise, costs for a district change over time as their mix of student needs changes, even with little or no change in the number of students receiving special education. The fewer students in a district, the more sensitive that district may be to having one or two students who require very high-cost services.

These scenarios show why special education funding should be linked to costs on a per student basis rather than variation among districts. But unlike school districts, which number about 500 statewide and for which cost data is tracked, there are over three hundred thousand students receiving special education in Pennsylvania, and their special education costs are rarely itemized student-by-student. With so many students, a system where each student is their own funding tier is infeasible. The only practical approach is to use a multi-tier system.

A Solution Ready Made: The SEFC Funding Tiers

The Special Education Funding Commission (SEFC) recognized this reality. Their report explicitly notes the process of defining tiers involves balancing better fit between funding and costs against reduced workability. Their task was to strike the best balance of a three-tier model stipulated in their PA Act 3 commission with the distribution of costs across Pennsylvania's special education population. Their cost data, presented in an appendix of their report, was from a sample survey.²⁵

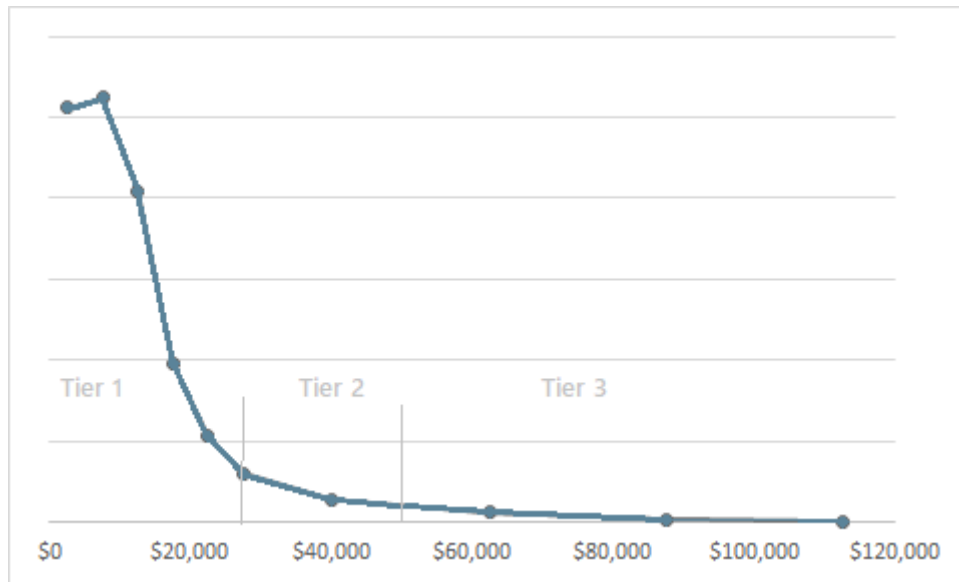
The curve in Figure 3 represents that special education cost data. The tiers in Figure 3 are well-chosen relative to the curve for the number of tiers. The first break is near an inflection point in the curve's slope and by effectively dividing the third tier into two halves, 3A and 3B, the ranges assigned to each of the higher tiers were given broadly similar ranges.

The tiered system recommended by the commission, and enacted for Pennsylvania's district schools, has been a key improvement in that it linked funding, at least loosely, to actual costs of providing special education. Over time as it applies to a growing share of funding for district schools, it should work increasingly well. It was intended to also be applied to charter school funding for the same reasons that it was applied to district schools, but that recommendation has not yet been enacted.

²⁴ See "How Much Does Special Education Cost?" earlier in this text.

²⁵ Special Education Funding Commission Report (2013). www.senatorbrowne.com/wp-content/uploads/sites/37/2015/05/Special-Education-Funding-Commission-Report-121113.pdf. p.6, 36, 43-46, 56, Appendix, etc. Act 3 specified 3 categories, but the SEFC created an implied fourth tier (3B), as a result of the Extraordinary Costs (Contingency) Fund applying to cases over \$75,000 at the time of the proposal, around \$77,655 now.

Figure 3. Special Education Costs Among Public School District Students, SEFC Survey (2013)

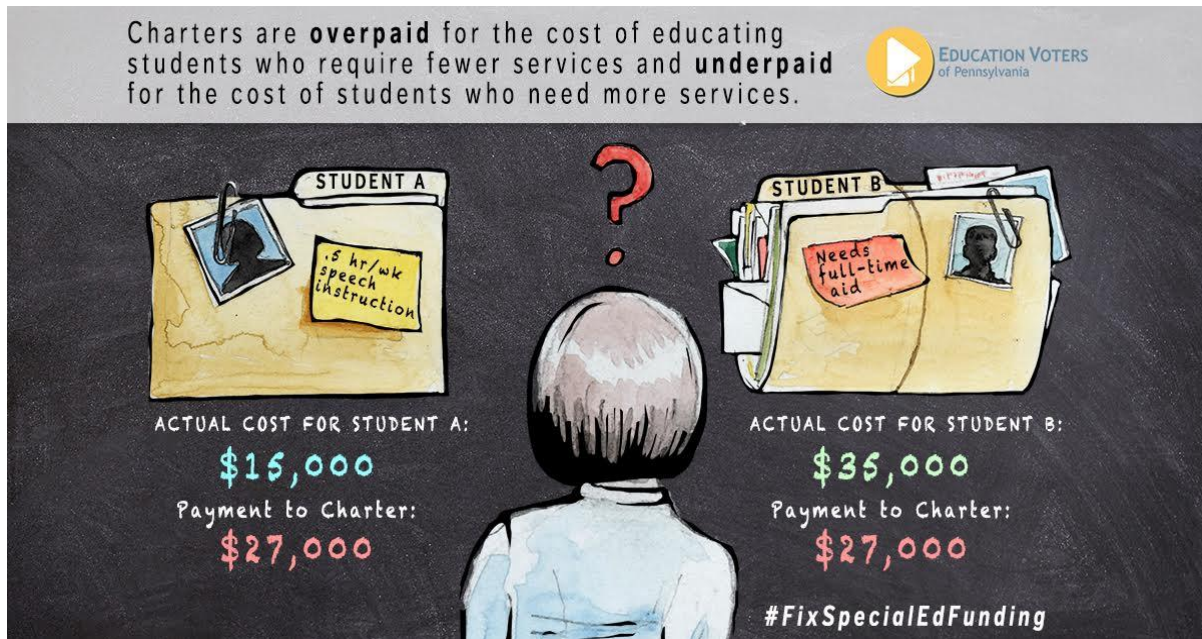


An Invitation to Charter Schools to Exploit the System

The fact that charter schools receive the same amount of tuition from a school district for each special education student regardless of the costs of the services provided, whether the student receives a half hour of speech therapy per week or needs a full-time aide and extensive nursing care, combined with the absence of any requirement that the money be spent on education – a charter school can spend the money on other things, or take it as profit – creates an incentive for them to game the system. Students who cost less than the tuition rate are a financial gain for the charter school. Those who exceed the tuition rate are a financial loss. The less costly, the greater the profit; the more costly, the bigger the loss. It is a very ripe opportunity for abuse, and wasted money.

This incentive encourages charter schools to discriminate based on disability status, to cherry pick students who require less costly services, and to avoid enrolling, perhaps even actively exclude, students with greater needs, denying them the opportunity for school choice. The incentive also encourages them to “over-identify” students needing special education. That is, it encourages them to inflate the number of students receiving special education so as to gain the higher, special education rate of tuition.

Consider two hypothetical children, A and B, from a school district where the special education tuition is \$27,000. The cost of Child A’s special education is a relatively low \$15,000 while the costs for child B are \$35,000 per year. Child A represents \$12,000 of surplus for a charter school and a desired enrollee. Child B represents a \$20,000 loss and may be “counselled away”, or dissuaded from enrollment.



Do Charter Schools Exploit the Flaw?

That a financial incentive exists to game the system does not necessarily mean charter schools are exploiting it, but there is anecdotal evidence to suggest some are. Testimony given to the Special Education Funding Commission in 2013 suggests the likelihood some charter schools may over-identify and selectively enroll, discriminating on special education costs.²⁶ An Education Law Center analysis for Philadelphia, Pittsburgh, and Erie in 2017 found charter school under-enrollment of students with typically high-cost disabilities such as blindness or autism, or multiple disabilities, while students with typically low-cost disabilities such as speech impairment or specific learning disabilities were often overrepresented. Particularly glaring was the situation in Philadelphia where charter schools served 50.6% of students with speech impairments, but only 20.2% of those with multiple disabilities and 20.7% of those with autism.²⁷ This finding is consistent with cherry picking low-cost students.

How Can We Know if Charters are Cherry Picking Low-Cost Students?

If charter schools selectively discriminate based on special education costs, they will have more than the expected number of students with special education costs below the special education tuition rates they receive, and fewer special education students above those tuition rates. Generally that means more Tier 1 students and fewer Tier 2 and Tier 3 students.²⁸

²⁶ Ibid, especially p.45, 49-51, with testimony on issues of over-identification.

²⁷ "Inequities in Pennsylvania's Charter Sector: Segregation by Disability". Education Law Center (2017) www.elc-pa.org/wp-content/uploads/2017/02/ELC-Analysis-Inequities-in-PA-Charter-Schools-Segregation-by-Disability.pdf

²⁸ In about 70% of Pennsylvania school districts, special education tuition rate does not exceed the top value (e.g. \$25,885) of Tier 1. In the other, approximately 30% of districts, which include Pittsburgh and, by a small margin, also Philadelphia, charter schools can also profit from at least some Tier 2 students. These would still be less profitable than Tier 1 students. In no school district does the special education tuition rate exceed the top value (e.g. \$51,769) of Tier 2.

Comparing Special Education Enrollment at Charter Schools and District Schools

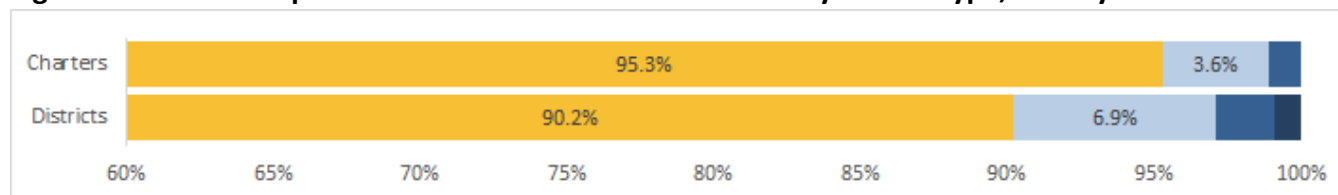
Three sets of data were used to assess the extent to which Pennsylvania charter schools may be cherry picking students who require low-cost services for their special education tuition. The first of these was a written report with Act 16 data on the number of students in Tiers 2, 3A, and 3B for each school district and each charter school, for the 2017-18 school year.²⁹ However, this report did not provide a total number of students receiving special education, nor Tier 1 numbers. For school districts, that data came from a Pennsylvania Department of Education Act 16 dataset on the total number of students receiving special education and the numbers of students in each tier, for 2017-18.³⁰ Comparable data showing total numbers for charter schools was received via a custom inquiry to the Pennsylvania Department of Education, and Tier 1 data for charter schools was imputed by subtracting the sum of the other tiers from the total number of students. This allows us to compare the percentages in each tier for sets of charter schools against the percentages in each tier for sets of district schools.

There are 499 school districts, 161 non-cyber charter schools, and 15 cyber charter schools in the full dataset.³¹ The total population of included students was N=290,753, of which 25,596 (8.8%) were enrolled in charter schools. More than half (N=84, 52.2%) of the non-cyber charter schools are located in Philadelphia, with other concentrations in: surrounding southeastern counties (12, 7.5%), Allegheny County (N=22, 13.7%), Lehigh and Northampton Counties (N=12, 7.5%), and the lower Susquehanna counties (N=10, 6.2%). The rest (N=21) are spread across the other 55 counties of Pennsylvania.

How Large is the Enrollment Gap between District and Charter Schools?

The stacked bar graph in Figure 4 compares the percentage of special education students in each tier between district schools and charter schools, for all of Pennsylvania. Tier 1 is the gold bar. Tier 2 is light blue. Tier 3A is blue, and Tier 3B is dark blue. The graph shows only the upper 40% of the distribution, to highlight the contrast between charter and district schools, and because Tier 1 should be the majority in most schools.

Figure 4. Percent of Special Education Students in each Tier by School Type, Pennsylvania 2017-18



²⁹ "A Report of Expenditures Relating to Exceptional Pennsylvania Students". (Revised July 2019). Pennsylvania Department of Education. Conducted and reported in compliance with Act 16 of 2000.

³⁰ Tier 2 and 3 values for some records were masked because they were less than ten, but we already had that data from the "Report of Expenditures" (Ibid). The overlapping data allowed us to validate that the data matched.

³¹ Bryn Athyn School District was excluded from these analyses due to its unusual circumstances and outlying values.

In district schools, 90.2% of students receiving special education are in Tier 1, leaving about 9.8% in higher tiers (6.9% in Tier 2 and 2.9% in Tiers 3A/3B). Charter schools have a larger portion of Tier 1 students (95.3%) and only about half the percentage of higher tier students that district schools have: 3.6% in Tier 2 and 1.0% in Tiers 3A/3B combined.

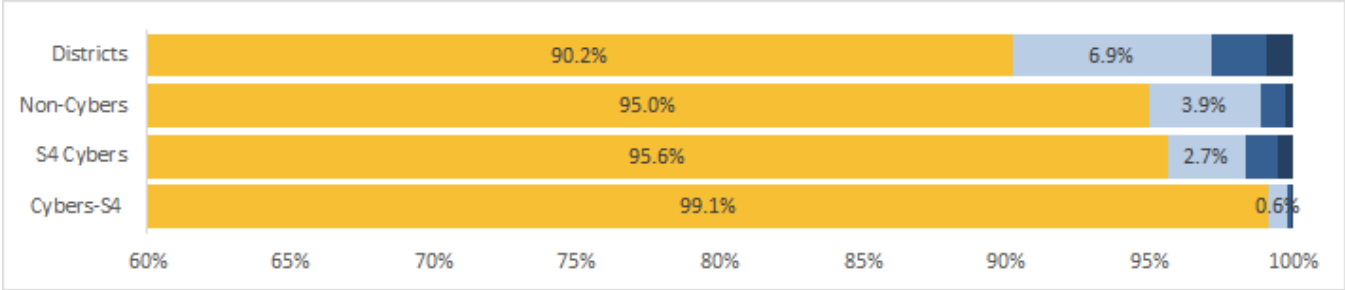
Phi (ϕ) is a statistic used to measure the strength of relationship in a crosstab, in this case the strength of relationship between school type and distribution of students across tiers. A phi of zero indicates no difference between charter and district schools and a phi of one indicates complete absence of higher tier students in charter schools. For a 2x2 crosstab with higher tiers collapsed into a single category, the value of phi $\phi=.050$. This is not an especially strong effect, probably because of the many Tier 1 students in both kinds of school.

A more intuitive way of thinking about the distribution is to ask: How many students would need to shift from Tier 1 to higher tiers to reach the numbers expected if there were no difference between charter and district schools? A shift of 1407 students is needed, 4.6% of all charter school special education students. Compared to the number of students in higher tiers, 1433, this suggests that 49.5% of the special education students we should expect to see in those tiers, if there were no difference between charters and district schools, are not there. Although there are other possible explanatory factors, overt discrimination based on variation in costs – gaming the system – and/or institutional biases are likely explanations for this effect.

How Big is the Gap between Cyber and Brick-and-Mortar Charter School Enrollments?

Figure 5 compares cyber charter schools with non-cyber, i.e. “brick-and-mortar”, charter schools. The bar for district schools is included for reference. The four largest cyber schools, labeled “S4 Cybers”, have a pattern similar to non-cyber charter schools – 5.0% of the students receiving special education in non-cyber charters are higher tier students compared to 4.4% of those in “S4” cyber charters, with 1.2% of the former in Tiers 3A/3B compared with 1.6% of those in the “S4” bar -- but other cyber charter schools have extremely few students in the higher tiers – about 0.9%, with fewer than 0.3% in Tiers 3A/3B -- suggesting notably more of a selection bias than non-cyber charter schools, whether or not any deliberate difference in cherry picking is occurring.

Figure 5. Percent of Special Education Students in each Tier, Cyber vs. Non-Cyber Charters 2017-18³²



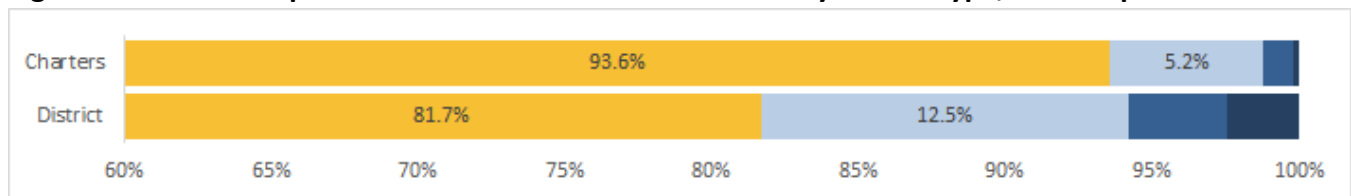
³² “S4 Cybers” are Agora Cyber CS, Commonwealth Charter Academy CS, Pennsylvania Cyber CS, Pennsylvania Leadership CS

Philadelphia

Over half (N=83) of all non-cyber Pennsylvania charter schools, about 42% of charter school special education students, and about 60% of special education students in non-cyber or “brick and mortar” charters are in Philadelphia. Figure 6 compares the tier enrollment in Philadelphia charter schools to the Philadelphia school district. Cyber charter schools are excluded because they can enroll students statewide.

Philadelphia shows a stronger difference between non-cyber charters and the city’s school district than the statewide comparison: $\phi=.160$ for a 2x2 crosstab. The needed shift is 1000 students, over 7.9% of all charter school special education students in Philadelphia. That is also about 70% of the shift for the state. With 812 existing upper tier students in the city’s non-cyber charter schools, a shift of 1000 suggests about 55% of the students we should expect to find in those tiers do not exist.

Figure 6. Percent of Special Education Students in each Tier by School Type, Philadelphia 2017-18



Does the Type of Charter School Matter?

Philadelphia has 21 Renaissance schools: public-private partnerships in which a private entity is given a charter to operate a district school. These neighborhood schools have an enrollment boundary, called a catchment zone. Unlike other charters, Renaissance Schools can only enroll students who reside with their catchment zone, and there is an expectation that they serve the neighborhood population. Otherwise they operate like charter schools with their own staff, curriculum and governance.³³

Philadelphia also has charter school chains, sets of charter schools all run by the same organization, which partly overlap with the set of Renaissance schools. Mastery runs eight Renaissance and five non-Renaissance charter schools. Universal runs six Renaissance and one non-Renaissance school. KIPP runs four non-Renaissance charter schools.

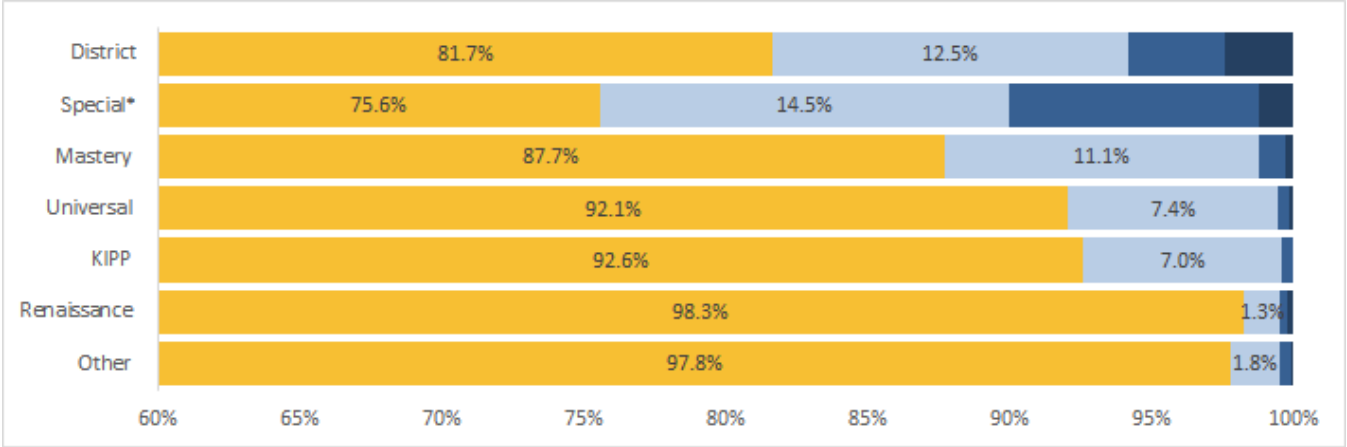
Figure 7 compares sets of Philadelphia charter schools. The bar labeled “Special” represents four atypical charter schools: three had more Tier 3 than Tier 2 students; one had mostly Tier 2 students.³⁴

³³ For brief overviews on Renaissance Schools see www.philasd.org/charterschools/portal_trashed/renaissance/ and www.philasd.org/studentplacement/services/renaissance-charter/

³⁴ Mariana Bracetti Academy CS, Philadelphia Academy CS, and Tacony Academy CS had more Tier 3 than Tier 2 students. Discovery CS had mainly Tier 2 students. We have no explanation for why these schools have atypical patterns of special education enrollment. If these schools were excluded from the comparison of Philadelphia charter schools with the district schools, the Phi (ϕ) for a 2x2 crosstab rises slightly to .175 and the needed shift rises to 1078 or just over 9% of the total number of special education students in Philadelphia charter schools, while the numbers in high-cost tiers declines to 626, which would suggest that 63% of the expected high-cost students are missing.

Despite small enrollments, those four schools account for half of Tier 3 students in Philadelphia charter schools. They have better numbers than the district schools, if their students are not over-identified, and far more students in the upper tiers than any of the other charter schools. The third, fourth, and fifth bars represent the chain charters. The sixth bar represents the other seven Renaissance schools, and the remaining 53 non-chain, non-Renaissance charters schools are included in the bottom bar.

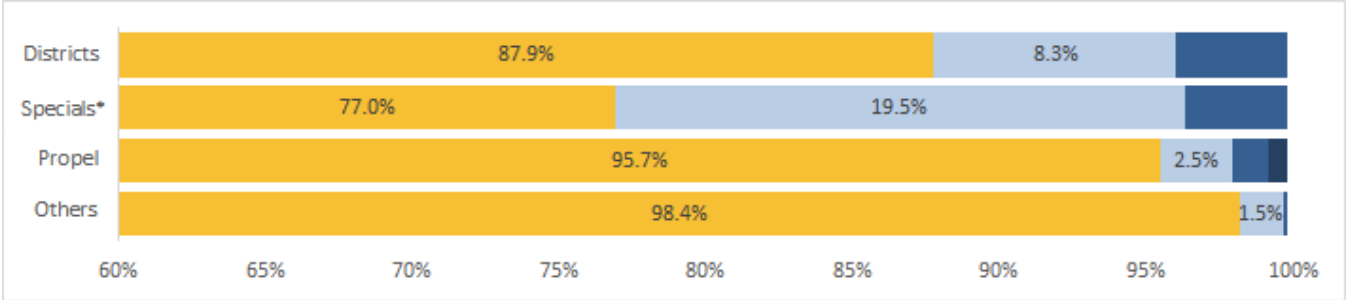
Figure 7. Percent of Special Education Students in each Tier in Philadelphia Charter Schools



Mastery schools, both Renaissance and the others, show the least indication of gaming the system, having numbers only a little different from district school enrollment patterns. KIPP and Universal are similar to one another, less favorable than Mastery schools, but better than other Renaissance schools and non-Renaissance charter schools.

Other than the atypical “Special” charters, the most notable pattern in Figure 7 is that the percentage of higher tier students in the non-chain charter schools, including the non-chain Renaissance schools, is much lower than the percentage in the three chains, especially Mastery. The contrast between chain and non-chain Renaissance schools suggests that neighborhood schools and catchment zone is not sufficient to avoid the problem of cost-selectivity in enrollment processes.

Figure 8. Percent of Special Education Students in each Tier by School Type, Allegheny County



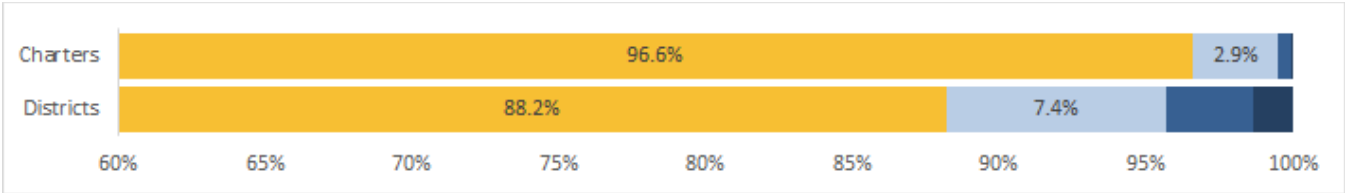
Allegheny County

Allegheny County, the Pittsburgh metropolitan area, has the second most brick and mortar charter schools (N=22 or 13.7%), trailing only Philadelphia. It has about 6.5% of Pennsylvania’s charter school special education students, and just over 6.0% of special education students in non-cyber charters.

Figure 8 compares charter schools and district schools in Allegheny County. Cyber charter schools are excluded because they can enroll students statewide. The bar labeled “Specials” is two charter schools with atypical patterns, having far more students with high-cost disabilities than other Allegheny County charters.³⁵ These two schools, with fewer than 12% of the county’s charter school students receiving special education, have half of all higher tier charter enrollments. The “Propel” bar represents the Propel chain of eight Allegheny County charter schools. All other charter schools are in the last bar.

There is a big gap in tier enrollment between district schools and the 20 charter schools not in the Specials bar. Whether it is better or worse than Philadelphia’s depends on how one measures it. The $\phi=.065$ for comparing district schools to these charters, suggesting a relationship only about a third as strong as Philadelphia’s trend. The needed shift is 127 students, or 8.5% of charter school special education students, a larger share than for Philadelphia. It is also 9.0% of the state shift, larger than the county’s share (6.0%) of the population of charter school students receiving special education. Moreover the needed shift is more than 2.7 times the current number of higher tier students in charter schools, not including the two specials, suggesting that over 73% of the students we should expect to see are missing. With Specials included, the needed shift drops to 106 and current students rises to 92, but this is still a deficit of 53.5% of the students we should expect to find in those tiers.

Figure 9. Percent of Special Education Students in each Tier by School Type, Southeast Counties



Other Regions

Other regions in Pennsylvania with enough charter schools to merit regional comparison include the Southeastern counties, the Lehigh Valley, and the Lower Susquehanna region. Figure 9 compares the percentages in each tier of special education for non-cyber charter schools and district schools in southeastern, suburban counties (i.e. Bucks, Chester, Delaware, and Montgomery) around Philadelphia. The phi values for a 2x2 crosstab is $\phi=.052$ for these counties. The needed shift is 221 students, which is 8% of the special education students in charter schools in the region, but over twice the present numbers in Tier 2 or higher, suggesting that over 70% of the students we should see in those tiers are missing.

³⁵ City High CS and Environmental CS at Frick Park

Figure 10. Percent of Special Education Students in each Tier by School Type, Lehigh Valley

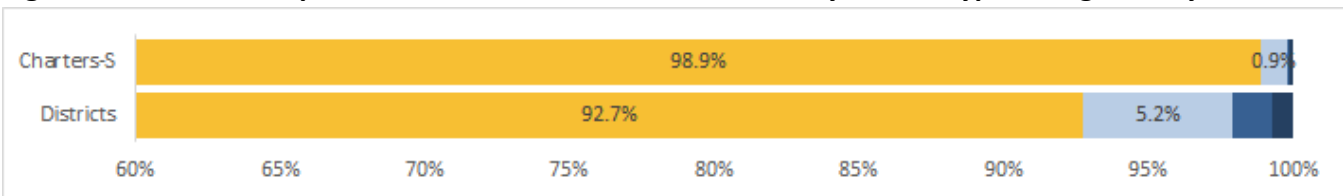
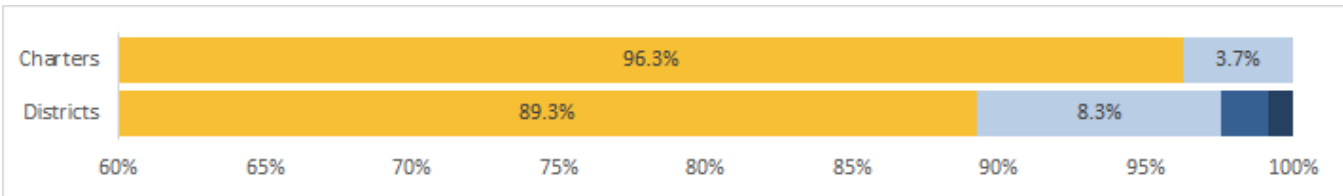


Figure 10 shows the Lehigh Valley comparison. This excludes one atypical charter school that had mainly Tier 2 students, five times as many as the total number of upper tier students in all the other Lehigh Valley charter schools combined.³⁶ The Phi value for a 2x2 crosstab is $\phi=.052$ for the Lehigh Valley. The needed shift is just 54 students, but that is more than five times the present numbers in upper tiers, excluding the atypical charter, which suggests over 84% of the students we should see in those tiers are missing. Even if the excluded charter school were included, there would still be almost 70% fewer high tier special education students than would be expected if there were no difference between charter school enrollment processes and those in district schools.

Figure 11. Percent of Special Education Students in each Tier by School Type, Lower Susquehanna



The Phi values for a 2x2 crosstab is only $\phi=.025$ for the Lower Susquehanna region. The needed shift is just 29 students, which is about 6.8% of the special education students in charter schools in the region, but that is still almost twice the numbers currently in Tier 2 or higher, suggesting that 64% of the students we should see in those tiers are missing.

A Consistent Pattern

Regions vary and charter schools vary, but statewide and in every region there is a marked pattern of far fewer upper tier students than the numbers expected if charter schools and district schools were the same. A small portion of charter schools are striking exceptions to the pattern, but that only makes the contrast more salient. Students with higher-cost special education needs are not getting the same school choice opportunities other students are receiving. This subverts one of the goals of the charter school law, may violate equal opportunity laws, and should be rectified.

The observed pattern is consistent with what we would expect if charter schools are deliberately exploiting the profit incentive built into the current funding formula, or if there are implicit, subconscious, or institutional biases against more needy kids in enrollment. It is possible there are other explanations altogether, though that seems unlikely, and we cannot guess what they might be.

³⁶ Eastern Arts Academy Charter School

Impacts

The charter school special education funding system undermines our core values of providing needed services to children and spending tax dollars as intended. Money is wasted in each school district where more than 16% of students receive special education, by paying charter schools more for special education than the per student average. According to PASBO, a net of about \$65 million annually is being wasted in this way statewide. This gap between charter school funding and district per student averages implies either that students in charter schools are being given potential for superior educational opportunities compared to those remaining in district schools and/or, more likely, wasted surplus spending is padding the profits of charter school management organizations and the private entities with whom they have contracts.

Further money is wasted in that students from those districts who receive special education in charter schools are disproportionately Tier 1 students for whom actual costs of special education are less than their district's per student special education spending. The Governor's office has estimated that about \$100 million in savings could be achieved by applying the SEFC tiered funding structure, and over \$130 million more could be saved from cyber charters by capping non-special tuition rates, to which tier multipliers are applied, for cyber charter schools.³⁷

The gap between charter school tuition rates and actual cost of education has a substantial impact on many school districts. The potential financial deficit it causes often requires raising taxes, creatively finding other ways to increase funding to offset the expense, and/or sacrificing educational services and programming for students. It hurts our kids.

The financial incentive in the formula is economically irrational. It encourages wasteful spending. It is also educationally irrational. Charter schools exist to provide educational choice to students, or at least their parents. The financial incentive works against that, rewarding charter schools for discrimination based on cost. They get rewarded if they deny educational choice to at least a portion of students with high cost special education needs.

The data suggests many charter schools may be doing exactly that. There are far fewer students with high cost special education needs attending charters than there ought to be. That structural inequality most likely indicates a problem even if it is not due to overt discrimination or implicit biases in charter school enrollment processes.

Recommendations

Our recommendations are guided by the following principles:

- Money should not be wasted.
- Special education funding should be tied to the costs of services students need.

³⁷ www.education.pa.gov/K-12/Charter%20Schools/CharterPolicyReform/Pages/LegisProposal.aspx Gov. Wolf's Proposed CSL Funding Reforms Excel Spreadsheet.

- There should not be cost-based barriers to special education opportunities.
- Attending district schools should not entail a special education funding disadvantage relative to attending charters schools, nor vice versa.
- There should be no incentive for charters to cherry pick students based on cost.
- The simpler the funding system is the better, *ceteris paribus*.

It is impossible to have a system that perfectly satisfies all of these principles, because they are in tension with one another. There are tradeoffs to be made, and a variety of possible solutions, depending on how heavily one values each of the principles relative to others. There are also at least two possible broad approaches to fixing the flaws in the special education funding system.

If the Commonwealth is unwilling to enact a tiered funding system, they should at least allow each school district to use its actual percentage of students who receive special education as the divisor of the charter tuition calculation. This would eliminate districts overpaying or underpaying relative to their per-student spending, save around \$65 million, and equalize average funding for district and charter special education students from the same district. However, charter school tuition would still be based on each school district's per student average expenditures, so this approach would not match special education funding in charter schools to costs among students within, or between, school districts. Nor would it eliminate the incentive for charter schools to cherry pick students.

A very different and far better approach would be to throw out formulas based on the percentage of students receiving special education and instead adopt a tiered system tied to the costs of students' special education needs. The easiest way to do that – the wheel already invented – is to apply the same tiered SEFF that is now used for district schools to charter schools, as the SEFC originally recommended, applying the multipliers to the base, i.e. non-special tuition rate.

Governor Wolf's proposal to apply the SEFF to charter schools saves about \$100 million³⁸ and applies the same special education funding rules to charter schools and district schools. It also more closely ties funding to actual costs, substantially reducing the incentive for charters schools to cherry pick students, and thus improving opportunities for school choice.

Hand in hand with applying the SEFF tiers to charter schools, a law should also be enacted requiring charter schools to return special education funding that is not used to provide services for students with disabilities. This money should go back to school districts, and be allocated to help other children get the services they need. This reform would virtually eliminate the incentive for charters to cherry pick students who require low cost services in order to reap a profit off of special education tuition that could be used to pay for other things. It would also preclude special education funding being spent on other things.

³⁸ www.education.pa.gov/K-12/Charter%20Schools/CharterPolicyReform/Pages/LegisProposal.aspx

Capping Regular Tuition for Cyber Charter Schools

In addition to applying the SEFF tiers to charter schools, Pennsylvania should cap regular tuition rates for cyber charter schools, i.e. enact a maximum regular tuition rate specifically for cyber charter schools. This impacts special education because the non-special tuition rate is the base to which tier multipliers apply. The lack of a physical school greatly reduces costs for cyber charter schools. It also removes a limit on how many students they can enroll. Combined with the cheaper electronic media they use to provide content, and centralized faculty, this allows economies of scale to provide education at a much cheaper cost than brick and mortar schools. Funding levels should reflect that reduced cost, as Education Voters of Pennsylvania has previously recommended. The cap proposal does this in a way that is still generous to cyber charter schools.

Notes on the Appendices

The appendices include a bar chart for each school district and charter school in Pennsylvania with the percentage of student enrollment in each special education tier.

- Sixty-six brick-and-mortar charter schools, 41% of the state's total charters, enroll no students in Tiers 2 or 3.
 - Twenty-four of Philadelphia County's 83 charter schools (29%) enroll no students in Tiers 2 or 3.
 - Eight of Allegheny County's 22 charter schools (36%) enroll no students in Tiers 2 or 3.
 - Six of Lehigh County's eight charter schools (75%) enroll no students in Tiers 2 or 3.
 - Three of Dauphin County's four charter schools (75%) enroll no students in Tiers 2 or 3.
 - All of Erie County's four charter schools (100%) enroll no students in Tiers 2 or 3.
 - All charter schools in Adams, Bedford, Berks, Clinton, Huntingdon, Lancaster, Luzerne, Mercer, and Westmoreland Counties (100%) enroll no students in Tiers 2 or 3.
- Cyber charters enroll far fewer Tier 2 and 3 students than district schools and fewer than brick and mortar charter schools. The four largest cyber charter schools, Agora Cyber CS, Commonwealth Charter Academy CS, Pennsylvania Cyber CS, and Pennsylvania Leadership CS, together have an enrollment of 4.4% Tier 2 and 3 students while the other 12 cyber charters enroll fewer than 1%. Seven cyber charter schools enroll no Tier 2 or 3 students.

Three sets of data were used.

The first of these was a written report with Act 16 data on the number of students in Tiers 2, 3A, and 3B for each school district and each charter school, for the 2017-18 school year.³⁹ However, this report did not provide a total number of students receiving special education, nor Tier 1 numbers. For school districts, that data came from a Pennsylvania Department of Education Act 16 dataset on the total number of students receiving special education and the numbers of students in each tier, for 2017-18.⁴⁰ Comparable data showing total numbers for charter schools was received via a custom inquiry to the Pennsylvania Department of Education, and Tier 1 data for charter schools was imputed by subtracting the sum of the other tiers from the total number of students. This allows us to compare the percentages in each tier for sets of charter schools against the percentages in each tier for sets of district schools.

There are 499 school districts, 161 non-cyber charter schools, and 15 cyber charter schools in the full dataset.⁴¹

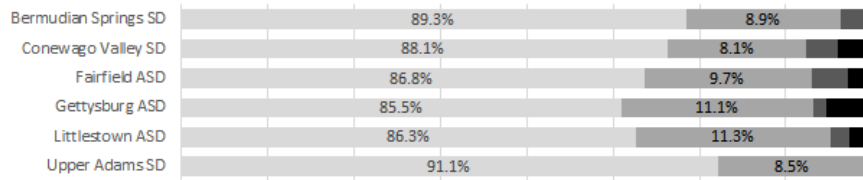
³⁹ "A Report of Expenditures Relating to Exceptional Pennsylvania Students". (Revised July 2019). Pennsylvania Department of Education. Conducted and reported in compliance with Act 16 of 2000.

⁴⁰ Tier 2 and 3 values for some records were masked because they were less than ten, but we already had that data from the "Report of Expenditures" (Ibid). The overlapping data allowed us to validate that the data matched.

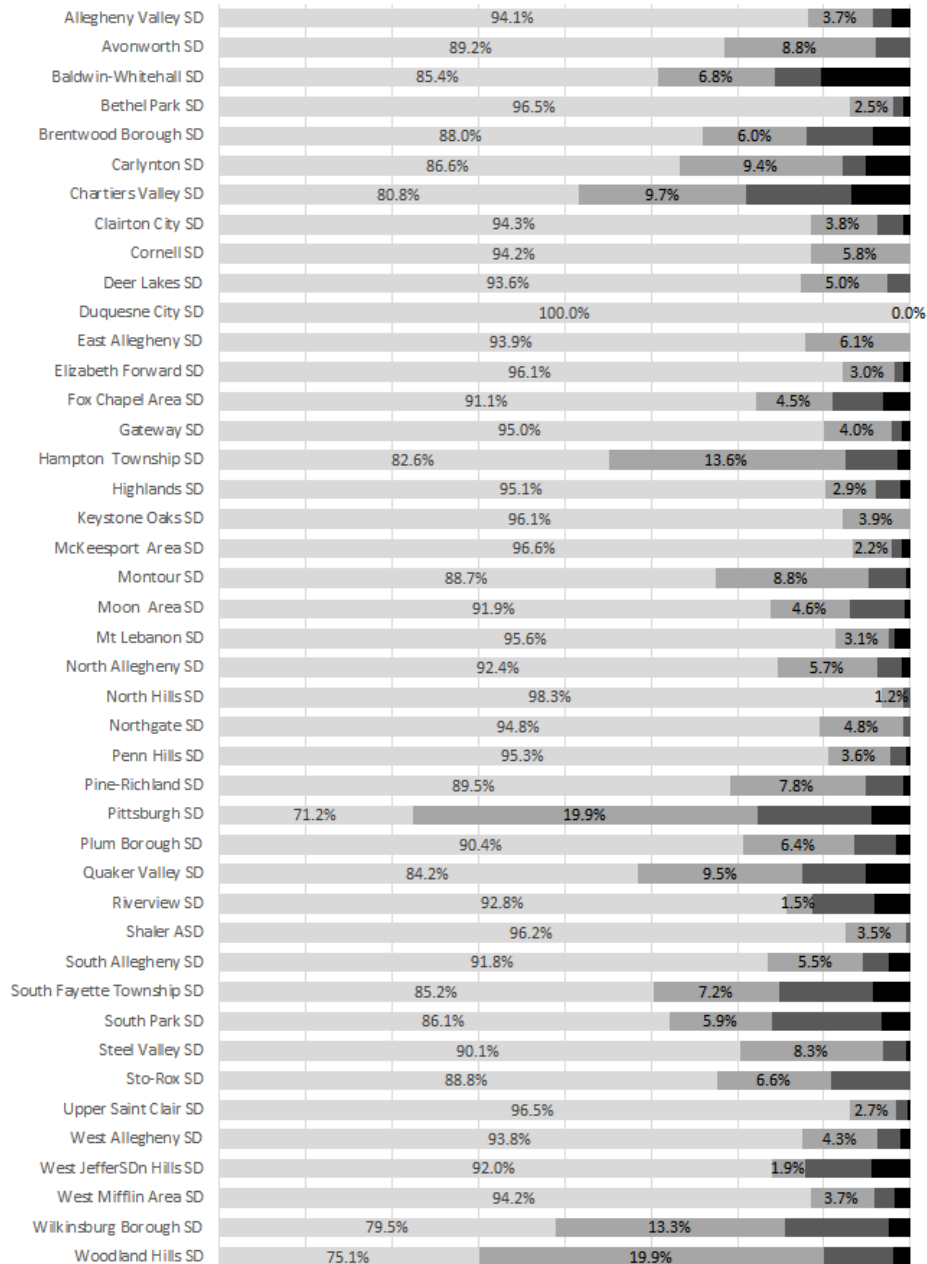
⁴¹ Bryn Athyn School District was excluded from these analyses due to its unusual circumstances and outlying values.

APPENDIX I: SPECIAL EDUCATION TIERS IN DISTRICT SCHOOLS

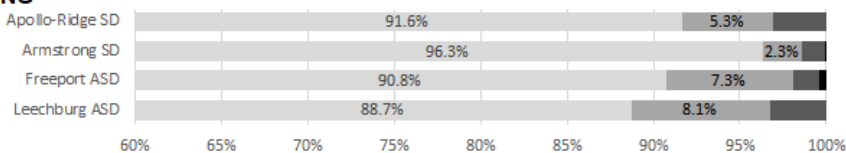
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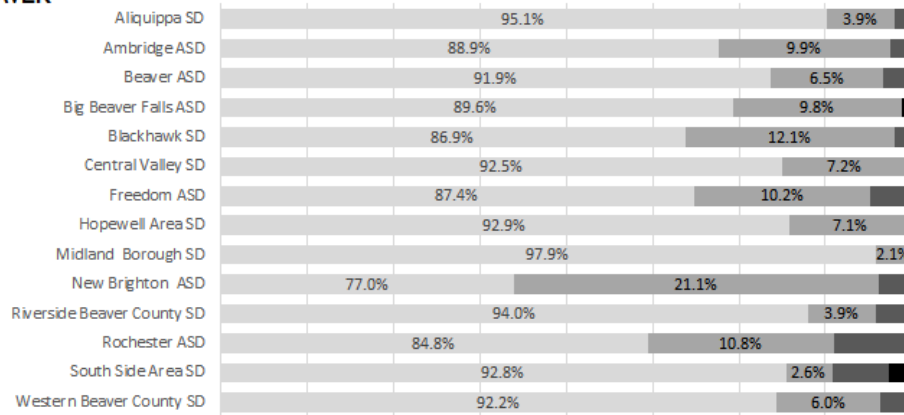


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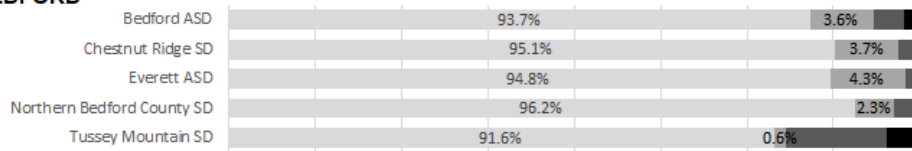


APPENDIX I: SPECIAL EDUCATION TIERS IN DISTRICT SCHOOLS

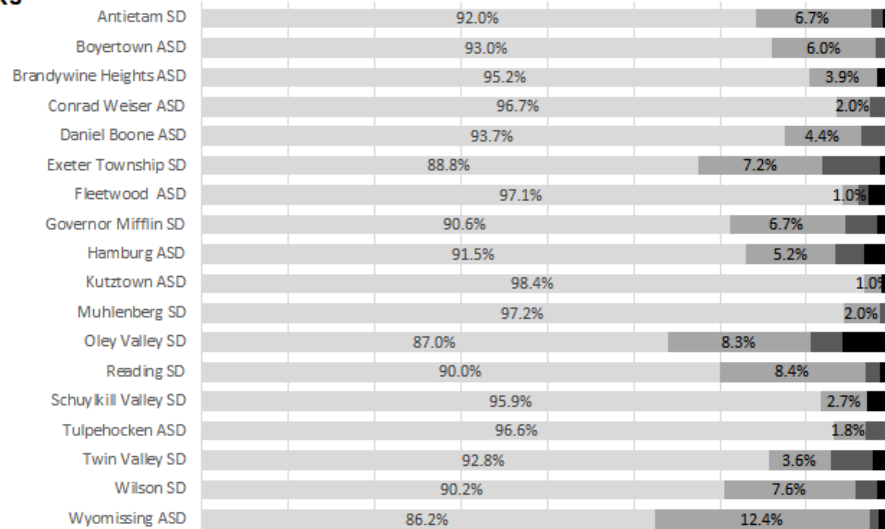
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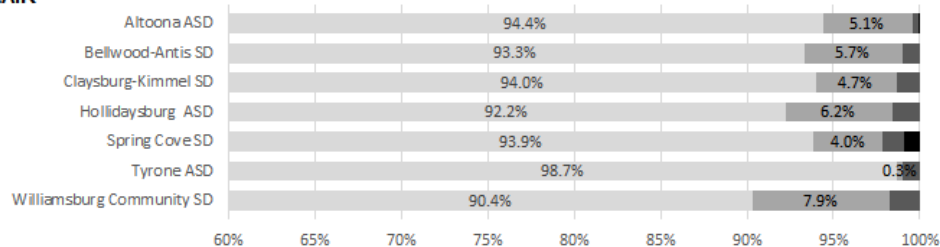
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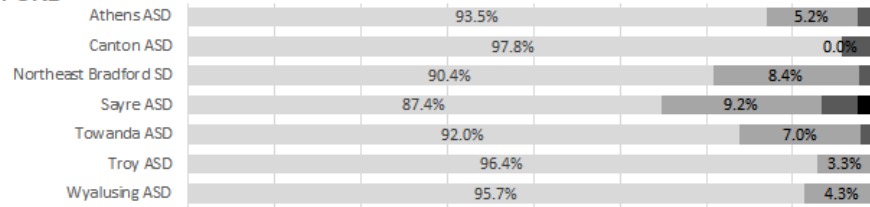


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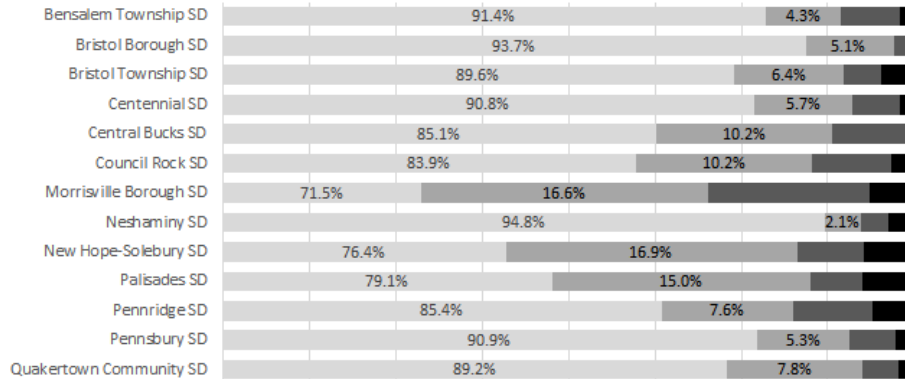


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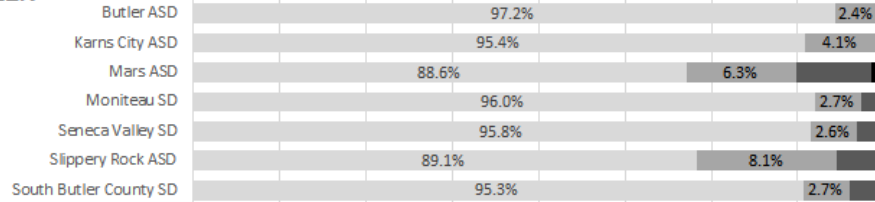
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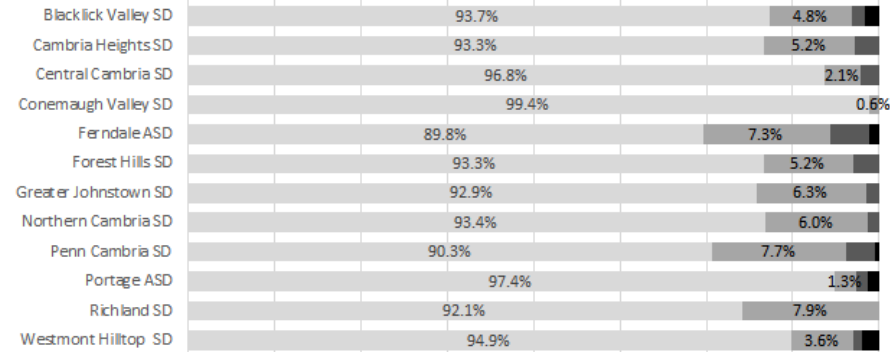
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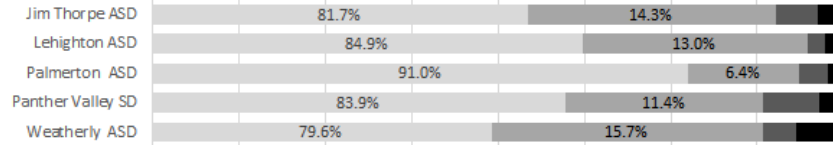
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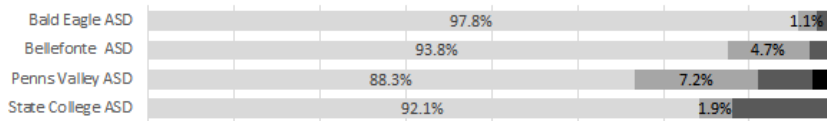
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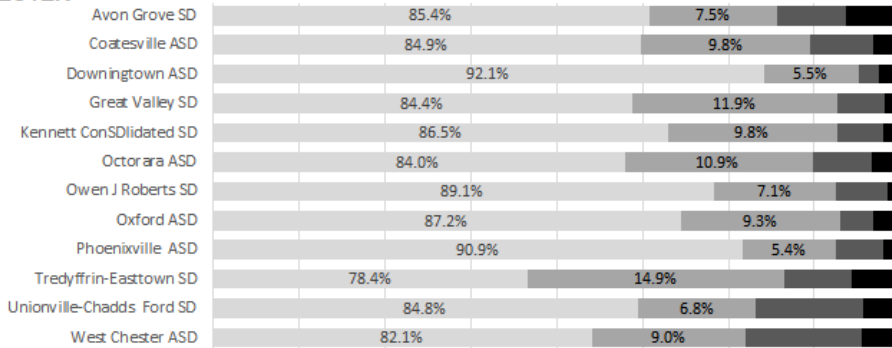
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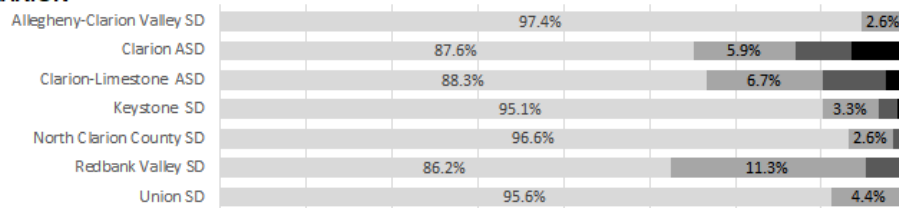
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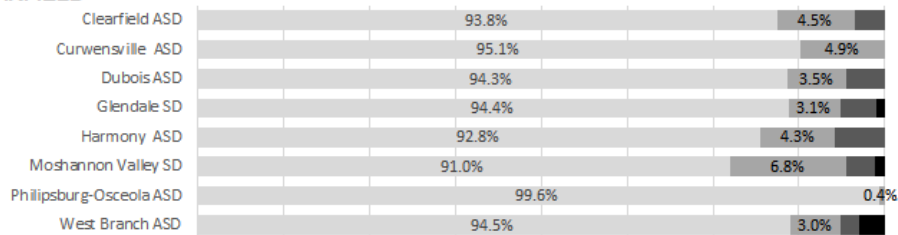
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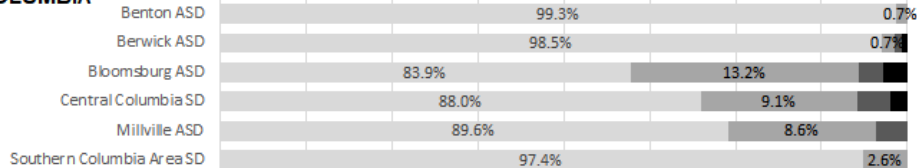
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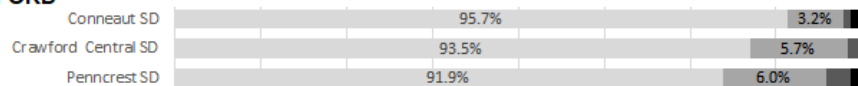
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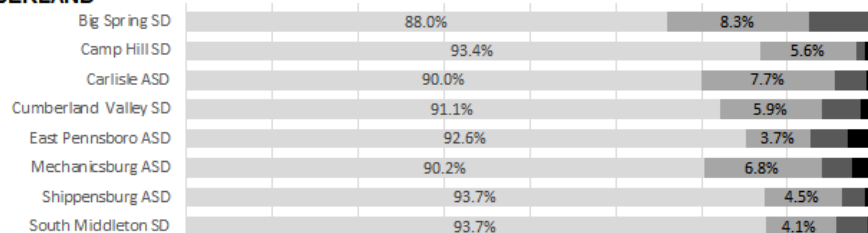
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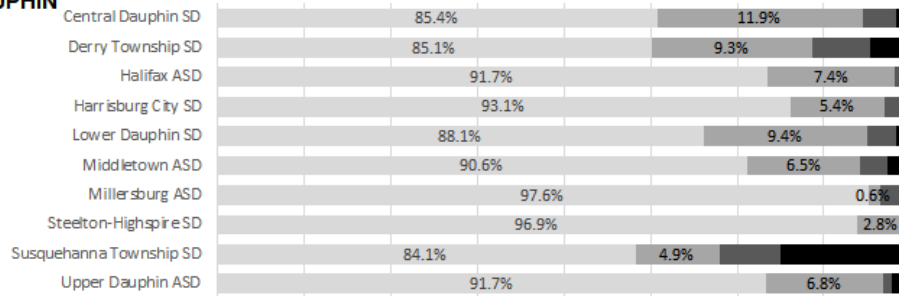
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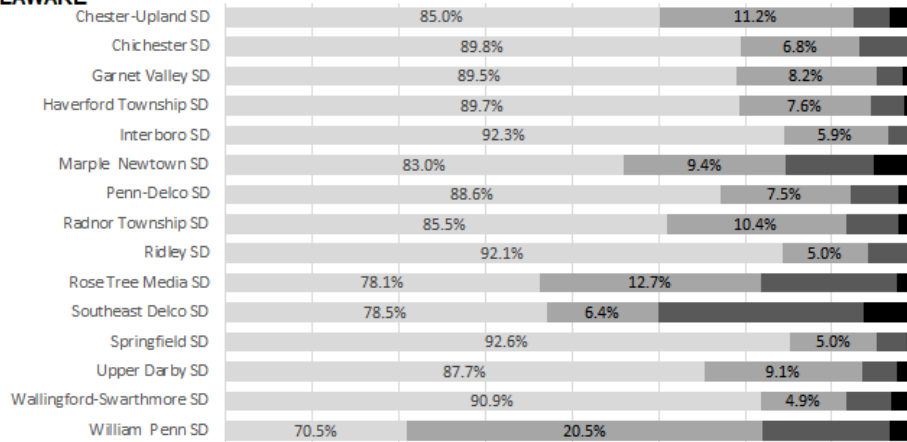
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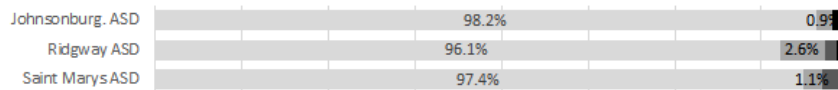
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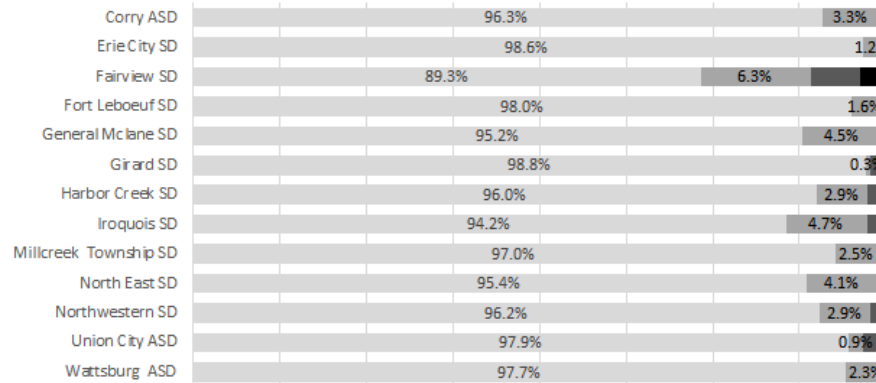
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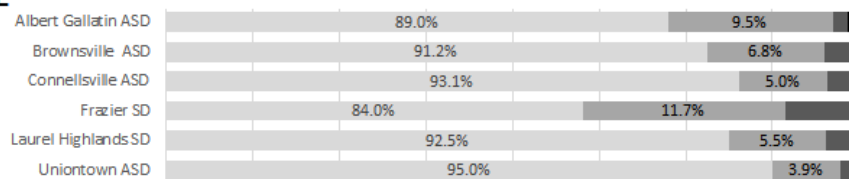
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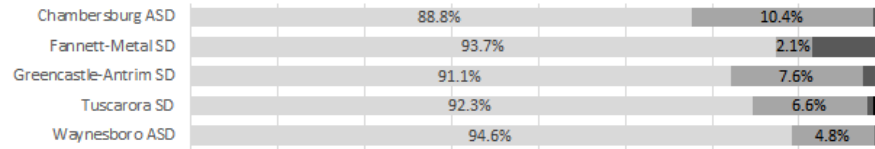
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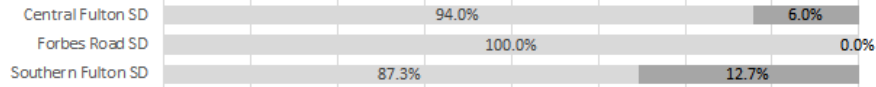
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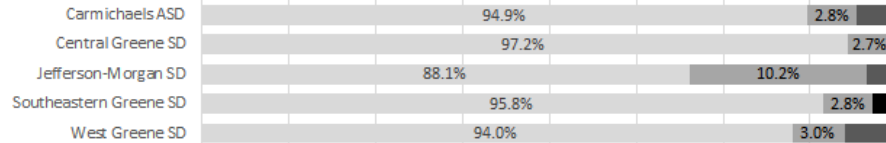
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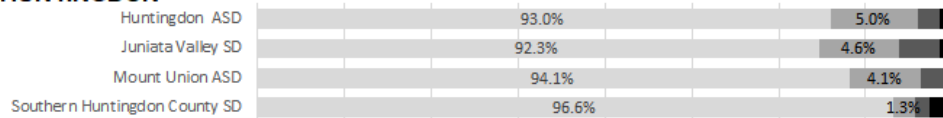
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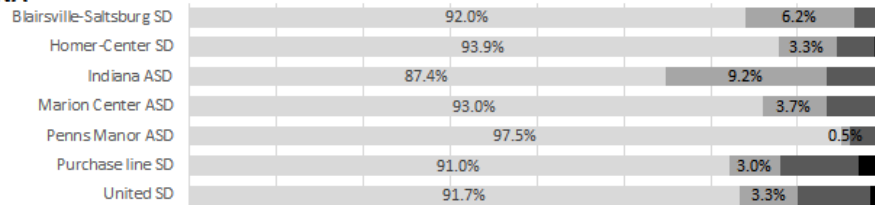
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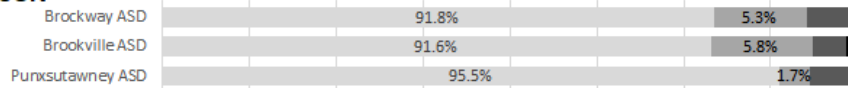
HUNTINGDON



INDIANA



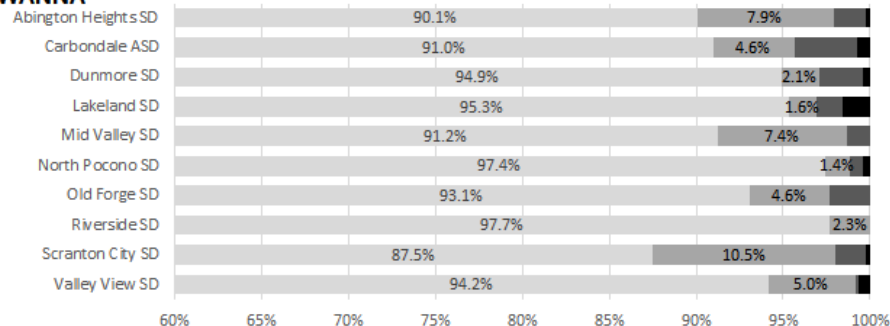
JEFFERSON



JUNIATA

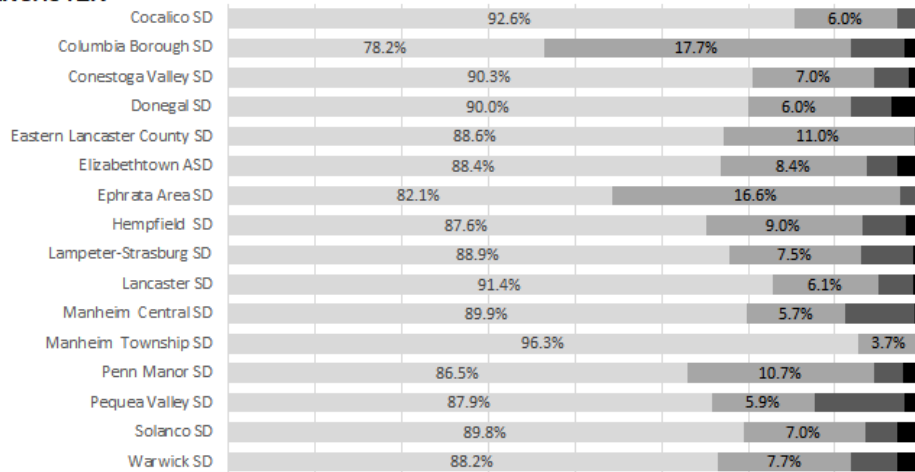


LACKAWANNA

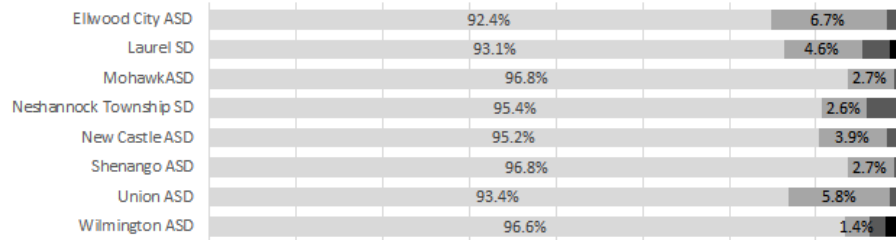


APPENDIX I: SPECIAL EDUCATION TIERS IN DISTRICT SCHOOLS

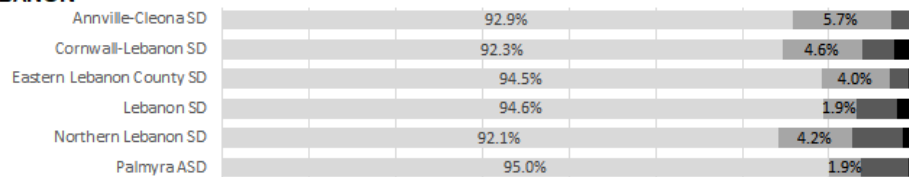
LANCASTER



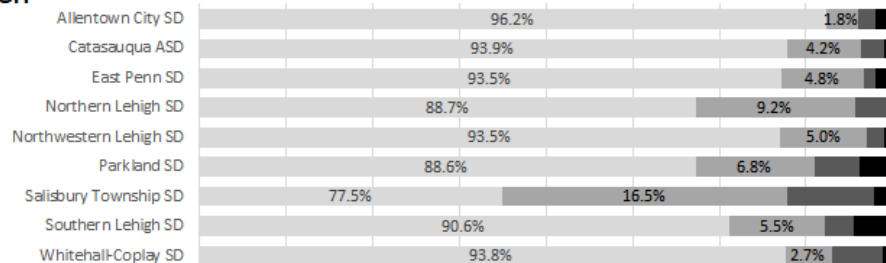
LAWRENCE



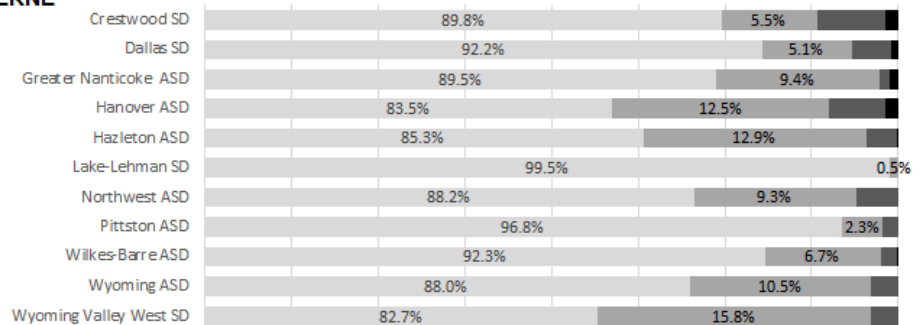
LEBANON



LEHIGH



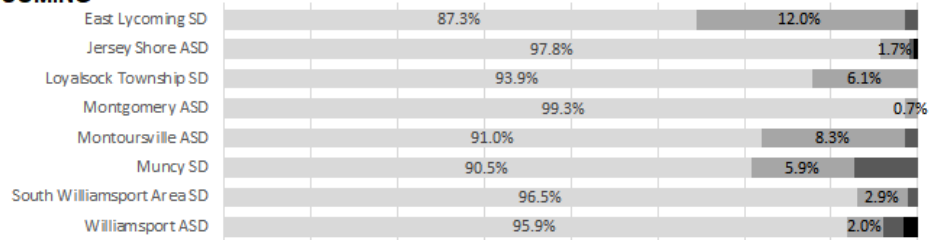
LUZERNE



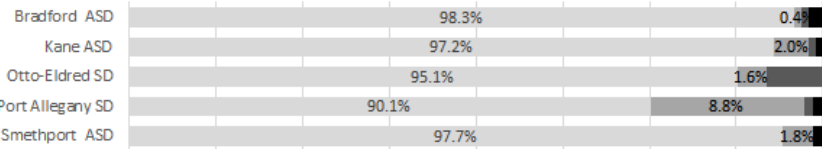
60% 65% 70% 75% 80% 85% 90% 95% 100%

APPENDIX I: SPECIAL EDUCATION TIERS IN DISTRICT SCHOOLS

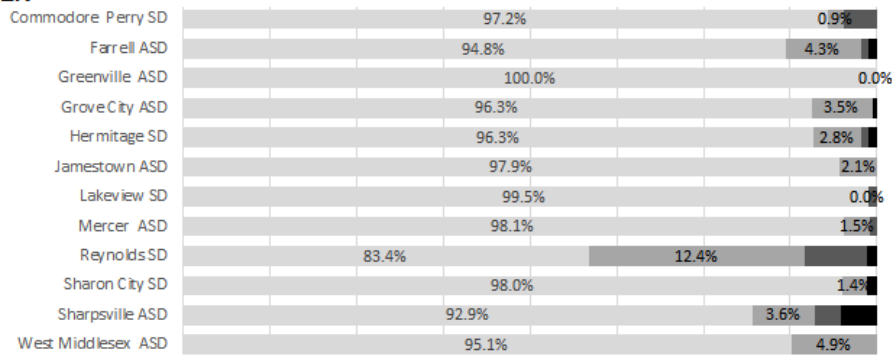
LYCOMING



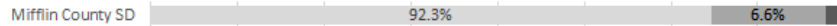
McKEAN



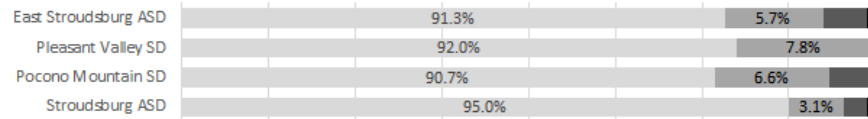
MERCER



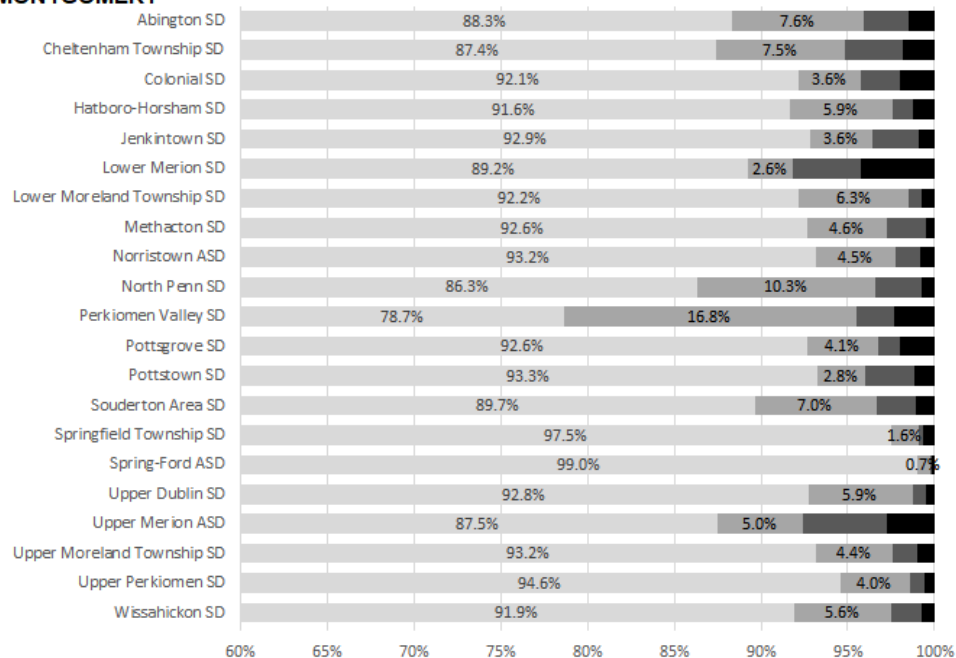
MIFFLIN



MONROE

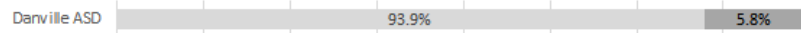


MONTGOMERY

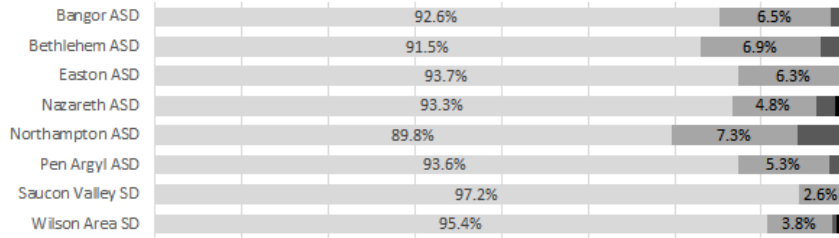


APPENDIX I: SPECIAL EDUCATION TIERS IN DISTRICT SCHOOLS

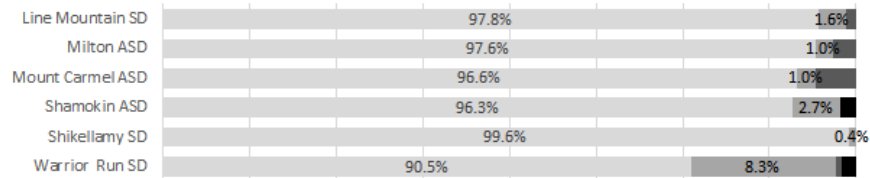
MONTOUR



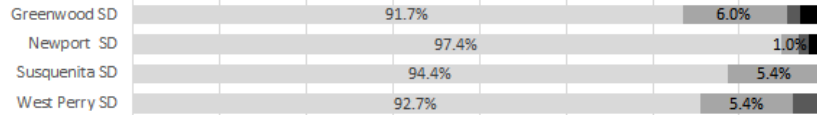
NORTHAMPTON



NORTHUMBERLAND



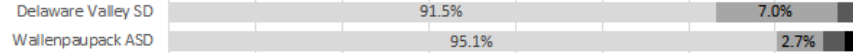
PERRY



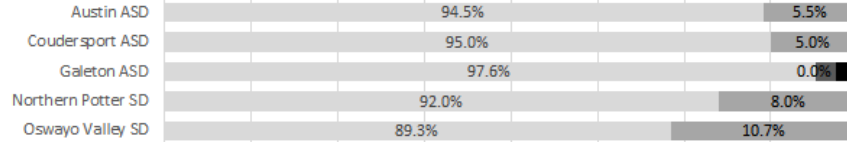
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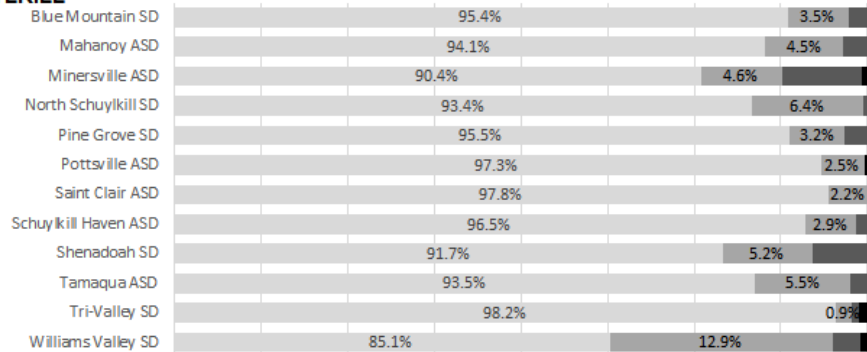
PIKE



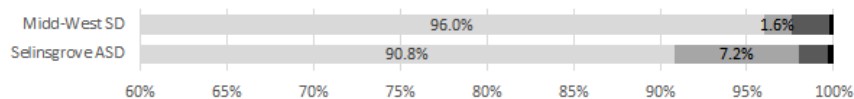
POTTER



SCHUYLKILL



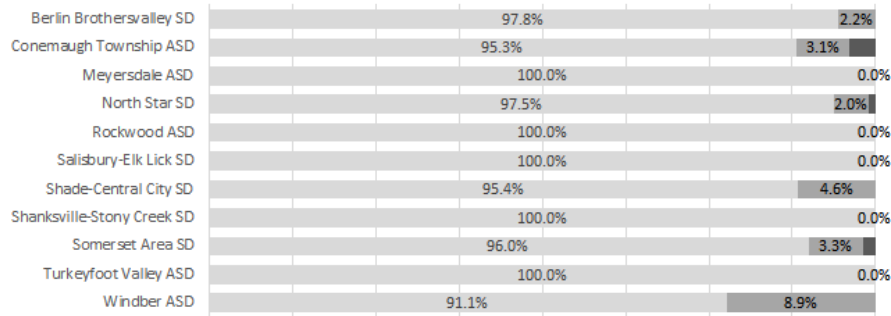
SNYDER



60% 65% 70% 75% 80% 85% 90% 95% 100%

APPENDIX I: SPECIAL EDUCATION TIERS IN DISTRICT SCHOOLS

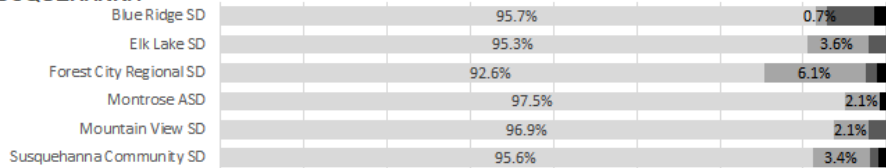
SOMERSET



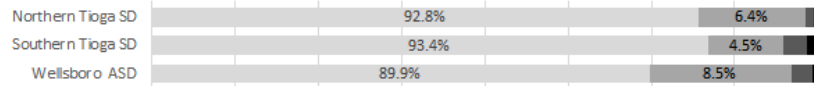
SULLIVAN



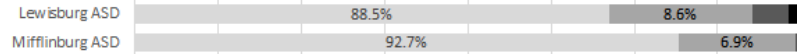
SUSQUEHANNA



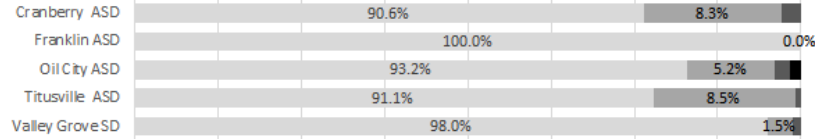
TIOGA



UNION



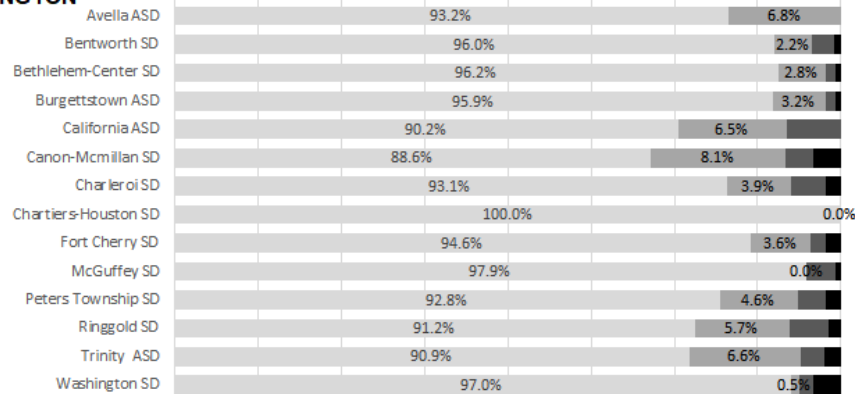
VENANGO



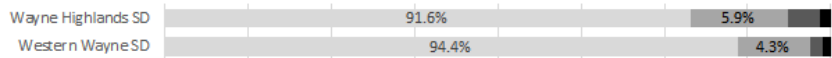
WARREN



WASHINGTON



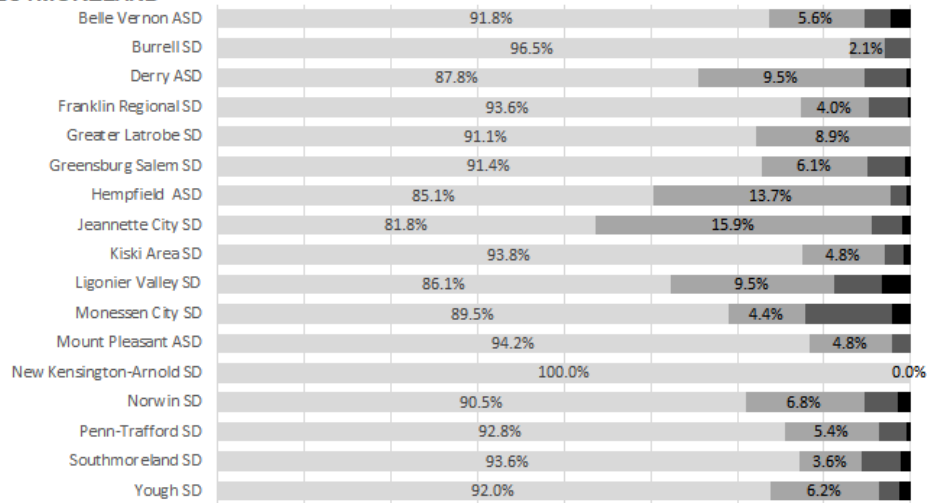
WAYNE



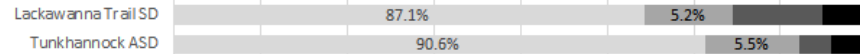
60% 65% 70% 75% 80% 85% 90% 95% 100%

APPENDIX I: SPECIAL EDUCATION TIERS IN DISTRICT SCHOOLS

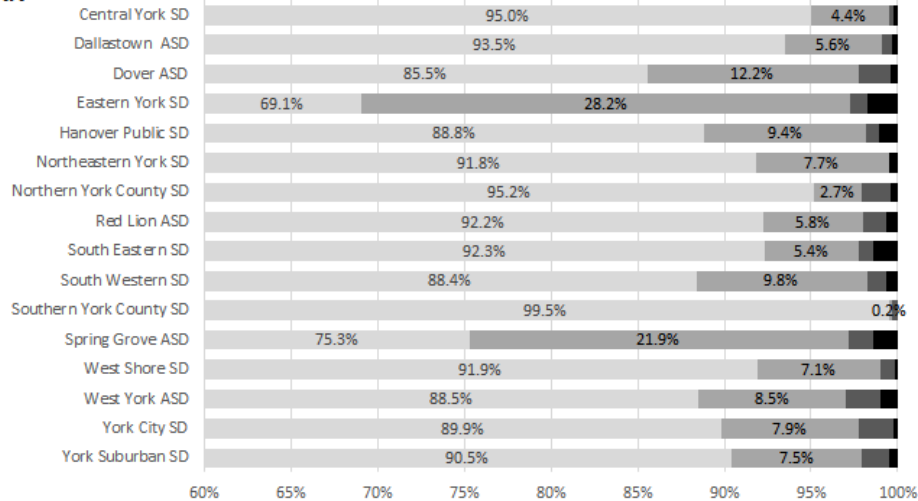
WESTMORELAND



WYOMING



YORK



APPENDIX II: SPECIAL EDUCATION TIERS IN CHARTER SCHOOLS

ADAMS

Gettysburg Montessori CS	100.0%	0.0%
Vida CS	100.0%	0.0%

ALLEGHENY

City High CS	88.2%	11.8%
Environmental CS at Frick Park	63.3%	28.9%
Hill House Passport Academy CS	100.0%	0.0%
Manchester Academic CS	100.0%	0.0%
Penn Hills CS of Entrepreneurship	98.7%	1.3%
Propel CS- Braddock Hills	95.9%	0.5%
Propel CS- East	96.9%	1.5%
Propel CS- Hazelwood	92.7%	7.3%
Propel CS- Homestead	95.8%	2.8%
Propel CS- McKeesport	100.0%	0.0%
Propel CS- Montour	95.5%	2.3%
Propel CS- Northside	95.0%	3.8%
Propel CS- Pitcairn	93.2%	5.4%
Provident CS	97.8%	2.2%
Spectrum CS	97.0%	0.0%
The New Academy CS	100.0%	0.0%
Urban Academy of Greater Pittsburgh CS	100.0%	0.0%
Urban Pathways 6-12 CS	95.0%	5.0%
Urban Pathways K-5 College CS	95.5%	4.5%
Westinghouse Arts Academy CS	100.0%	0.0%
Young Scholars of McKeesport CS	100.0%	0.0%
Young Scholars of Western Pennsylvania CS	100.0%	0.0%

BEAVER

Baden Academy CS	99.3%	0.7%
Lincoln Park Performing Arts CS	100.0%	0.0%

BEDFORD

HOPE for Hyndman CS	100.0%	0.0%
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BERKS

I-LEAD CS	100.0%	0.0%
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BUCKS

Bucks County Montessori CS	94.7%	5.3%
Center for Student Learning CS at Pennsbury	100.0%	0.0%
School Lane CS	89.7%	8.1%

CENTRE

Centre Learning Community CS	100.0%	0.0%
Nittany Valley CS	100.0%	0.0%
Young Scholars of Central PA CS	94.8%	5.2%

CHESTER

Avon Grove CS	92.5%	6.0%
Chester County Family Acad. CS	100.0%	0.0%
Collegium CS	96.7%	2.7%
Renaissance Academy CS	99.0%	1.0%

CLINTON

Sugar Valley Rural CS	100.0%	0.0%
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DAUPHIN

Capital Area School for the Arts Charter	100.0%	0.0%
Infinity CS	100.0%	0.0%
Premier Arts and Science CS	97.5%	2.5%
Sylvan Heights Science CS	100.0%	0.0%

DELAWARE

Chester Community CS	98.3%	1.7%
Chester CS for the Arts	98.7%	1.3%
Vision Academy CS	100.0%	0.0%
Widener Partnership CS	98.7%	1.3%

60% 65% 70% 75% 80% 85% 90% 95% 100%

APPENDIX II: SPECIAL EDUCATION TIERS IN CHARTER SCHOOLS

ERIE

Erie Rise Leadership Academy CS	100.0%	0.0%
Montessori Regional CS	100.0%	0.0%
Perseus House CS of Excellence	100.0%	0.0%
Robert Benjamin Wiley Community CS	100.0%	0.0%

HUNTINGDON

New Day CS	100.0%	0.0%
Stone Valley Community CS	100.0%	0.0%

LACKAWANNA

Fell CS	100.0%	0.0%
Howard Gardner Multiple Intelligence CS	94.1%	5.9%

LANCASTER

La Academia: The Partnership CS	100.0%	0.0%
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LEHIGH

Arts Academy CS	100.0%	0.0%
Arts Academy Elementary CS	100.0%	0.0%
Circle of Seasons CS	98.7%	1.3%
Executive Education Academy CS	100.0%	0.0%
Innovative Arts Academy CS	100.0%	0.0%
Lincoln Leadership Academy CS	97.8%	1.1%
Roberto Clemente CS	100.0%	0.0%
Seven Generations CS	100.0%	0.0%

LUZERNE

Bear Creek Community CS	100.0%	0.0%
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MERCER

Keystone Education Center CS	100.0%	0.0%
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MONTGOMERY

Souderton CS Collaborative	78.4%	16.2%
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NORTHAMPTON

Easton Arts Academy Elementary CS	73.8%	
Lehigh Valley Acad Regional CS	96.8%	2.7%
Lehigh Valley CS for Performing Arts	100.0%	0.0%
Lehigh Valley Dual Language CS	100.0%	0.0%

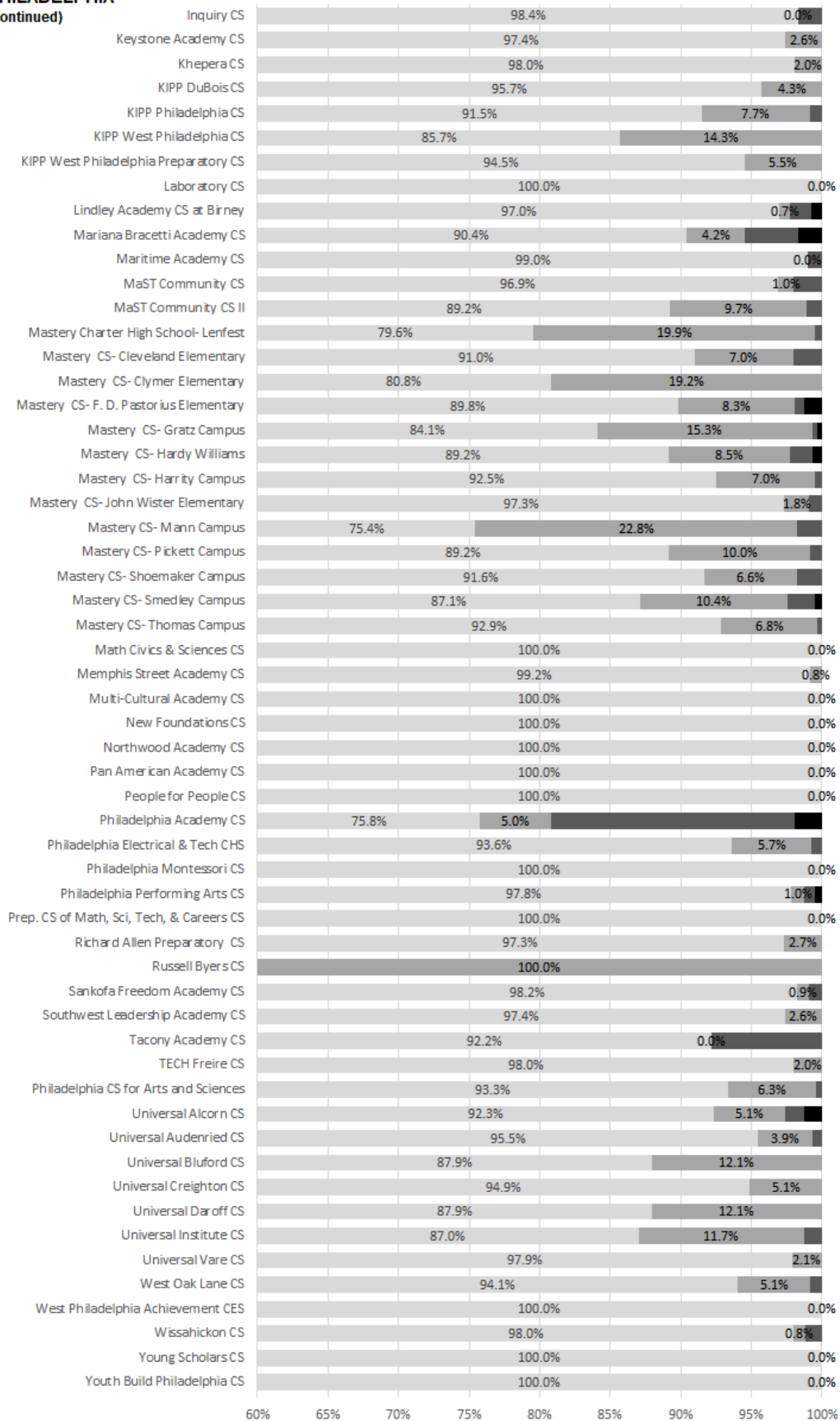
PHILADELPHIA

Ad Prima CS	97.6%	2.4%
Alliance For Progress CS	100.0%	0.0%
Antonia Pantoja Community CS	95.9%	4.1%
ASP IRA at John B. Stetson CS	100.0%	0.0%
ASP IRA at Olney Charter High School	99.3%	0.2%
Belmont CS	98.9%	1.1%
Boys Latin of Philadelphia CS	100.0%	0.0%
Charter HS for Architecture and Design	100.0%	0.0%
Christopher Columbus CS	100.0%	0.0%
Community Academy of Philadelphia CS	100.0%	0.0%
Discovery CS	90.6%	
Eastern University Academy CS	97.1%	2.9%
Esperanza Academy Charter High School	100.0%	0.0%
Eugenio Maria De Hastes CS	94.0%	6.0%
First Philadelphia Preparatory CS	95.8%	3.2%
Folk Arts-Cultural Treasures CS	97.7%	1.1%
Franklin Towne Charter Elementary School	100.0%	0.0%
Franklin Towne CHS	100.0%	0.0%
Frederick Douglass Mastery CS	95.5%	4.5%
Freire CS	97.4%	1.7%
Global Leadership Academy CS	98.9%	1.1%
Global Leadership Academy CS SW	100.0%	0.0%
Green Woods CS	100.0%	0.0%
Harambee Inst. of Sci & Tech CS	100.0%	0.0%
Imhotep Institute Charter High School	93.5%	5.6%
Independence CS	93.3%	5.9%
Independence CS West	98.8%	1.2%

60% 65% 70% 75% 80% 85% 90% 95% 100%

APPENDIX II: SPECIAL EDUCATION TIERS IN CHARTER SCHOOLS

PHILADELPHIA (Continued)



APPENDIX II: SPECIAL EDUCATION TIERS IN CHARTER SCHOOLS

SCHUYLKILL



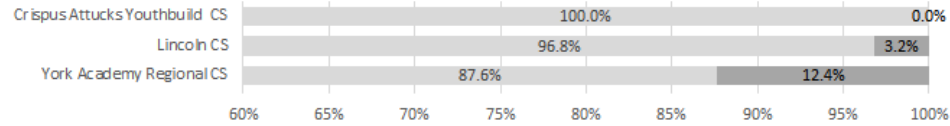
WARREN



WESTMORELAND



YORK



CYBERS

