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High-Quality Charter Authorizing Policy Profiles: Rhode Island

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Rhode Island: Overview of State Law and Snapshot of Quality Authorizing Practices

Introduction and Methodology

The National Charter School Resource Center (NCSRC) created the [Policy Framework for High-Quality Charter Authorizing Practices \(Framework\)](#) as a tool for assessing a State policy environment's support for high-quality authorizing practices. The Framework is based on a review of high-quality authorizing practices referenced in the Every Student Succeeds Act (ESSA) and literature by the National Association of Charter School Authorizers (NACSA) and the National Alliance of Public Charter Schools (Alliance).ⁱ NCSRC staff used this review to identify common themes or categories of policies that are essential to State support for high-quality authorizing and incorporated them into the Framework.

NCSRC then created High-Quality Charter Authorizing Policy Profiles (State Authorizing Profiles) that describe states' authorizing policy contexts based on the Framework. As of winter 2020, NCSRC staff created 19 profiles for the States that were awarded Charter School Programs (CSP) State Entities grants between FY2017 and FY2019, including:

- Alabama
- Arizona
- Arkansas
- Colorado
- Delaware
- Idaho
- Indiana
- Maryland
- Michigan
- Minnesota
- Mississippi
- New Mexico
- New York
- North Carolina
- Oklahoma
- Rhode Island
- Texas
- Washington
- Wisconsin

CSP State Entity (SE) Grants provide funding for State entities to support eligible applicants in planning and preparation for the opening of new charter schools and the replication and expansion of high-quality charter schools. Grant funds must also be used by the State entity to provide technical assistance to eligible applicants and to improve the quality of authorizing.

More State Authorizing Profiles may be added in the future. In addition, NCSRC may publish updated versions of State Authorizing Profiles to reflect changes in State policy.

The State Authorizing Profiles are intended to be used by state policymakers and practitioners to learn about their own authorizing policy environments and those of their peers. They may also be useful to charter school support organizations and charter management organizations that are looking to learn about different states' policy contexts.

Each State profile includes a (i) Framework Snapshot, which is an assessment of a State's authorizing practices using the Framework described in the first paragraph above and (ii) a more detailed description of the state context for each practice. The basis for the State Profiles was a review of the charter law and significant State policies for applicable states. Significant

state policies included those issued by the state education agency and/or state board of education. NCSRC used this review to identify whether the authorizing practices specified in the Framework were present in state law or policy. That is, boxes that were checked in the Framework Snapshot indicated that particular aspects of an authorizing practice(s) were included in state law or policy.

The State Authorizing Profiles provide a foundation for understanding authorizing practices in the State. The profiles are not an exhaustive review of the State's authorizing policies and practices; it is intended to describe the key elements of the State's policy context for supporting high-quality authorizing practices. Therefore, it is possible that certain State policies are not reflected in the profiles, and that individual authorizers within a state are implementing other practices as well. In addition, the review does not assess the quality of implementation of the policies; it is possible that state policy or statute articulates a quality practice that authorizers do not implement with fidelity.

Finally, state policy is one strategy for advancing high-quality authorizing practices and is the strategy we are focusing on in these profiles. However, there are other strategies and sources of support, including technical assistance and resources provided by state, regional, and local charter support associations. While this report does not address those other strategies, it provides a narrative of the policy context in which authorizers operate. We articulate this context to support authorizers and authorizer support organizations in understanding how to implement quality authorizing practices in their States.

Overview of State Law

Rhode Island’s General Assembly approved the State’s charter school law in 1995, and this legislation has been amended several times since it was initially enacted.ⁱⁱ The stated purpose of charter schools is to “provide high-performing educational opportunities to public school students and develop innovative educational practices that can be shared with other public schools.”ⁱⁱⁱ

In 1998, the law was amended to allow nonprofit organizations or Rhode Island colleges and universities to establish new public schools,” with the goal of “encouraging innovation and improvement in student performance.”^{iv} In 2004, a legislative moratorium was implemented by the legislature which lasted until 2008.^v The law was subsequently amended in 2008 to create mayoral academies, “a unique type of charter public school where mayors establish regional charter public schools, with the ultimate goal of improving student outcomes and strengthening communities.”^{vi}

The legislature revised the law again in 2010 to specify the three types of charter schools permissible under State law (district charter schools, independent charter schools, and mayoral academies), and raise the cap on charter school growth from 20 to 35.^{vii} Under State law:

- (i) District charter schools can be established as a new or conversion school by existing public schools, groups of public school personnel, public school districts or groups of districts.
- (ii) Independent charter schools can be established by college or universities within the State or by nonprofit organizations within the State that have existed for at least two years and for a “substantial reason other than to operate a school.”
- (iii) Mayoral academies can be created by the mayor or elected town administrator acting by or through a nonprofit.

In 2014, the General Assembly replaced the Board of Regents for Elementary and Secondary and the Board of Governors for Higher Education with the Rhode Island Board of Education. In 2016, the law was revised to define a network charter, make local written support required to open a network charter, and ensure the Council considers the fiscal and programmatic impact of the charter’s proposal.^{viii}

State Authorizing Profile: Rhode Island

Framework Snapshot¹

Authorization

- Does not cap charter school growth
- Provides for more than one authorizing pathway

Application includes the following:

- Specific application criteria
- Timelines
- Evaluation review process
- Process for denied applications

Performance-based contract includes and provides for the following:

- Separate post-application agreement
- Rights and responsibilities of authorizer and school
- Academic, financial, and operational performance expectations for schools
- Initial term of not more than five years
- Fiscal, legal, and programmatic autonomy for schools
- Independent charter school governing boards

Performance Monitoring

- Provides for annual authorizer evaluation of schools based on the performance goals and expectations set forth in performance-based contract
- Establishes a comprehensive accountability/monitoring system that includes performance expectations and compliance requirements
- Minimizes schools' administrative and reporting burden
- Articulates authorizer action for schools that fail to meet performance expectations (e.g., probation, sanction, or turnaround)

Renewal/Revocation

- Establishes a clear renewal process and decision-making criteria
- Requires that decisions to renew/revoke be based on student academic achievement
- Requires clear school closure procedures (e.g., parent notification, student enrollment, student record transfer, and disposition of assets)

Authorizer Accountability

- Provides for a registration process for eligible authorizing entities
- Requires the State entity to review authorizers' performance
- Requires authorizers to adhere to standards for high-quality authorizing

Authorizer Leadership, Student Access, and Student Services

- Requires a mission or strategic vision for authorizing
- Promotes quality authorizing by requiring technical assistance or professional development for authorizers and/or charter school applicants
- Ensures equitable access to all students
- Requires appropriate services for educationally disadvantaged students (e.g., students with special needs, English learners, students in foster care, or unaccompanied homeless youth)

Authorizer Funding

- Provides a mechanism for guaranteed access to authorizer funding
- Includes a process for holding authorizers accountable for how funding is used

Source(s): Rhode Island General Laws, Title 16, Chapters 16-77 to 16-77.4.

¹ As noted in the Introduction and Methodology section, boxes checked in the framework snapshot indicate that aspects of an authorizing practice(s) were included in State law or policy. If individual authorizers create and follow a certain policy that is not in State statute or policy, then the box will not be checked for the entire State.

Authorization

- Does not cap charter school growth
- Provides for more than one authorizing pathway

Does not cap charter school growth

Rhode Island law caps the number of charter schools at 35.

Provides for more than one authorizing pathway

The Council of Elementary and Secondary Education (Council) located within the Rhode Island Department of Education (RIDE), is the State's only charter school authorizer. The Council, led by the Office of the Commissioner (Commissioner) is responsible for charter school approval, renewal, and revocation decisions; managing a comprehensive system for charter school accountability; and monitoring charter schools.^{ix} The Council also works in conjunction with the State Board of Education to accomplish these objectives. See *Overview of State Law* above for additional details on the different types of charter schools authorized in Rhode Island.

Application includes the following:

- Specific application criteria
- Timelines
- Evaluation review process
- Process for denied applications

Specific application criteria

Rhode Island's charter school regulations require that State applications to open a charter school (also referred to as the proposed charter) or amendments to a charter for expansion must include evidence of need and community support; the school's plans for identifying and successfully serving students with disabilities, English learners, students who are academically behind, and gifted students, including but not limited to compliance with applicable laws and regulations; a detailed school start-up plan, identifying tasks, timelines, and responsible individuals; and explanations of any partnerships or contractual relationships central to the school's operations or mission.^x These regulations also include additional requirements for applications planning to contract with an education service provider.^{xi}

In addition, there are specific application criteria for district charter schools, independent charter schools, and mayoral academies.^{xii} Notably, any nonprofit organization that seeks to establish an independent charter school must submit its financial records and financial plan for operating the school to the auditor general, who shall review the records, the financial plan, and the financial integrity of the organization.

Timelines

State law requires applications for a proposed charter to be submitted to the Commissioner (whose office is located within RIDE) no later than December 1 of the year before the school year in which the school is to be established or expanded.^{xiii} Though the law distinguishes between the application timelines for district charter schools, independent charter schools, and mayoral

academies,^{xiv} timelines for the approval process are the same once applications are complete and include the following steps:

- The Commissioner must provide a 60-day comment period, during which at least two public comment hearings must be held.
- Within 90 days after the conclusion of the public comment period, the Commissioner must consider any objections or recommendations made during the public comment period before making a decision whether to recommend granting the charter to the Council.
- The Commissioner may recommend the final charter for approval by the Council no later than July 31 of the year before the school year in which the charter school is to be established.^{xv}

Evaluation review process

As with application timelines, State law also establishes review processes for each type of charter school.^{xvi} In general, the Commissioner must first review the application for completeness, and if the application is incomplete, the Commissioner may request or require additional information.^{xvii}

Regarding the review process for district charter school applications, the law specifies that,

Through their collective bargaining agent, teachers shall be afforded the opportunity to present their analysis and recommendations ... to the school committee of the district where the district charter school is to be located, and the board of regents ... if the union objects to the proposed charter ... it shall set forth the reasons for those objections in detail, and these objections/recommendations shall be considered and responded to by the district school committee, the commissioner, and the board of regents prior to its determination.^{xviii}

In addition, “if the Commissioner or the school committee of the district where the district charter school is to be located recommends the granting of the proposed charter, the matter shall be referred to the board of regents for a decision on whether to grant a charter.”^{xix}

When evaluating a proposed charter for an independent charter school or mayoral academy, the Council “shall place substantial weight on the fiscal impact on the city or town; programmatic impact on the sending school district; and the educational impact on the students in the district to ensure that the proposal is economically prudent for the city or town and academically prudent for the proposed sending school district and for all students in the sending district.”^{xx} In addition, “final approval for operation of the independent charter school shall not be granted by the council until the auditor general has approved the financial plan and financial-record keeping system and is satisfied that the nonprofit organization is financially responsible.”^{xxi}

Approved applicants are then granted a preliminary charter; authorization to operate requires final approval by the Council based on the Commissioner’s recommendation. Final approval is based on the applicant completing tasks, such as (i) obtaining articles of incorporation filed and approved by the State’s Office of the Secretary of State, (ii) having its business plan, financial

management procedures, and other relevant financial information reviewed by the State’s Office of the Auditor General, (iii) having an established governance structure to provide proper guidance and oversight of school operations (e.g., independent board), (iv) having a qualified chief administrator to oversee day-to-day operations, and (v) developing a final charter. “Upon successful completion of the tasks or with adequate written assurance that all tasks will be met prior to the opening of the school, the Commissioner may recommend the final charter for approval by the Council no later than July 31 of the school year before the school year in which the charter school is to be established.”^{xxii}

Process for denied applications

Throughout the review process, the Commissioner or the school committee of the district where a district charter school is to be located may, at any time, determine a proposed charter to have unsatisfactorily met guidelines and thus be unsuitable for further review. The rationale for this determination shall be submitted in writing to the applicant and made publicly available.^{xxiii}

Performance-based contract includes and provides for the following:

- Separate post-application agreement
- Rights and responsibilities of authorizer and school
- Academic, financial, and operational performance expectations for schools
- Initial term of not more than five years
- Fiscal, legal, and programmatic autonomy for schools
- Independent charter school governing boards

Separate post-application agreement

Once a charter application is approved, State law requires the school’s board to develop and enter a final charter.^{xxiv} As discussed above, the law has different requirements for district charter schools, independent charter school, mayoral academies.^{xxv}

Rights and responsibilities of authorizer and school

The school’s final charter confers authority to the school to operate and must include the Council’s obligations to the school as its authorizer.^{xxvi} If the school is an independent or mayoral academy, this document shall confer the authority to operate as a local education agency. If the school is an in-district charter, this document shall confer the authority to operate as a public school.^{xxvii}

Academic, financial, and operational performance expectations for schools

Under Rhode Island law, a school’s charter must include key elements of the educational plan, program details, assurances required by statute, and performance targets. The charter must also include the school’s accountability plan, which has student academic performance goals developed by the Commissioner and by the charter school as necessary to measure the school’s progress in achieving its mission, and operational performance goals including minimum expectations for the school’s financial performance and sustainability.^{xxviii}

Initial term of not more than five years

The law requires the initial term for new charter schools is not to exceed five years.

Fiscal, legal, and programmatic autonomy for schools

Rhode Island law states that “the key appeal of the charter school concept is its promise of increased accountability for student achievement in exchange for increased school autonomy.”^{xxxix} Charter schools have flexibility and autonomy in areas including curriculum, staffing organization, and budget. Charter school regulations permit the Council to grant waivers for most State education laws; however, charter schools are subject to laws relating to health and safety, school year length, teacher tenure and retirement, nondiscrimination, and others.^{xxx}

Independent charter school governing boards

Once the Council awards preliminary approval, regulations require the creation of a new nonprofit entity, and the nonprofit’s independent board of directors is responsible for the academic, organizational, and financial health of the school, and for ensuring compliance with applicable laws and regulations.^{xxxi}

Performance Monitoring

- Provides for annual authorizer evaluation of schools based on the performance goals and expectations set forth in performance-based contract
- Establishes a comprehensive accountability/monitoring system that includes performance expectations and compliance requirements
- Minimizes schools’ administrative and reporting burden
- Articulates authorizer action for schools that fail to meet performance expectations (e.g., probation, sanction, or turnaround)

Provides for annual authorizer evaluation of schools based on performance goals and expectations set forth in performance-based contract

State charter school regulations require the governing board of a charter school to prepare an annual report that details its progress in meeting the academic and organizational performance goals identified in its charter.^{xxxii}

Establishes a comprehensive accountability/monitoring system that includes performance expectations and compliance requirements

The law grants RIDE authority to manage a comprehensive system of charter school accountability and monitor charter schools in the State. Accordingly, RIDE collects data on the following performance areas: (i) student academic performance, (ii) financial viability and sustainability, (iii) organizational quality, and (iv) legal and regulatory compliance.^{xxxiii} Charter regulations require contracts to include an accountability plan with academic and operational goals necessary to measure the school’s progress in achieving its mission.^{xxxiv}

Minimizes schools’ administrative and reporting burden

Though neither State law nor regulations expressly mention minimizing schools’ administrative and reporting burden, the RIDE’s 2017 CSP application describes that,

The Office of College and Career Readiness’s (OCCR) development of an integrated and collaborative system of working closely with other offices within RIDE and external RI State governmental agencies to ensure the effective, efficient, and streamlined oversight of RI’s charter schools. [The] agency-wide incorporation of evaluation and monitoring

systems into [a] centralized performance review ensure that charters are not required to duplicate reporting or evaluative processes for multiple RIDE and state offices.^{xxxv}

Articulates authorizer action for schools that fail to meet performance expectations (e.g., probation, sanction, or turnaround)

As discussed in further detail in the next section, the Commissioner can place a charter school on probation in order for the school to meet its deficiencies and demonstrate improvement.^{xxxvi}

Renewal/Revocation

- Establishes a clear renewal process and decision-making criteria
- Requires that decisions to renew/revoke be based on student academic achievement
- Requires clear school closure procedures (e.g., parent notification, student enrollment, student record transfer, and disposition of assets)

Establishes a clear renewal process and decision-making criteria

The law permits the Commissioner, with the advice and consent of the Council/SBOE Council, to revoke a school's charter at any time if the school (i) materially violates any provision contained in its charter, (ii) fails to meet or pursue the educational objectives contained in its charter, (iii) fails to comply with the fiscal accountability procedures in its charter, (iv) violates provisions of the law, or, (v) after three consecutive years of operation, is not a "high-performing charter school" defined as a charter school public school that has demonstrated overall success.^{xxxvii} The Commissioner must notify the school in writing, specifying the facts and issues which may justify revocation before requesting authority to institute revocation proceedings. During the revocation hearing, a charter may be sustained, revoked, or placed on probation; in the case of probation, the Commissioner must establish a specific time period for the probation and the standards and requirements the Commissioner deems necessary for the school to demonstrate improvement.^{xxxviii}

Requires that decisions to renew/revoke be based on student academic achievement

Charter school regulations require the Council to base renewal decisions on the performance goals included in the school's charter. In addition, "student and instructional excellence" serves as the "primary evidence for decision making and accountability."^{xxxix}

Requires clear school closure procedures (e.g., parent notification, student enrollment, student record transfer, and disposition of assets)

In the event the Commissioner decides to close a school, the Commissioner may use its authority to "coordinate the education agencies of the State, including local school districts, so as to facilitate the enrollment of students from a closed charter school into other educational placements in order to ensure the continued provision of education services to those students."^{xl} In addition, the Commissioner shall ensure the preservation of the charter school records, and may require the public school system in which the charter was located to maintain the student records of a closed charter school.^{xli}

Authorizer Accountability

- Provides for a registration process for eligible authorizing entities
- Requires the State entity to review authorizers' performance
- Requires authorizers to adhere to standards for high-quality authorizing

Provides for a registration process for eligible authorizing entities

Since there is only one authorizer in the State, the law does not include an application process for other authorizing entities.

Requires the State entity to review authorizers' performance

The law does not require the State to review the Council's performance.

Requires authorizers to adhere to standards for high-quality authorizing

The law does not specify standards to improve authorizer oversight and management of schools in its portfolio. During an interview with RIDE, staff noted the department is working to incorporate quality authorizing best practices.^{xliii}

Authorizer Leadership, Student Access, and Student Services

- Requires a mission or strategic vision for authorizing
- Promotes quality authorizing by requiring technical assistance or professional development for authorizers and/or charter school applicants
- Ensures equitable access to all students
- Requires appropriate services for educationally disadvantaged students (e.g., students with special needs, English learners, students in foster care, or unaccompanied homeless youth)

Requires a mission or strategic vision for authorizing

State law does not require the Council to have a mission or strategic vision for authorizing. However, State Board of Education regulations specify that the Council's mission is to "lead and support schools and communities in ensuring that all students achieve at the high levels needed to lead fulfilling and productive lives, to succeed in academic and employment settings, and to contribute to society."^{xliiii}

Promotes quality standards by requiring technical assistance or professional development for authorizers and/or charter school applicants

While neither State law nor regulation require providing technical assistance or professional development for authorizers or charter school applicants, in its 2017 CSP application, RIDE proposed inviting prospective charter applicants to attend technical assistance sessions to provide clarity and support around the application process and criteria.^{xliiv} During an interview with RIDE, staff also indicated the office is working to increase internal areas of improvement/expertise so that it can provide technical assistance to charter schools.^{xliv}

Ensures equitable access to all students

In the event there are more applications than available seats, the law requires schools to conduct a random lottery.^{xlivi} Charter schools are also subject to the same federal statutory and regulatory

requirements applicable to Rhode Island Public Schools, including laws governing special education and accessibility to English learners.^{xlvii}

Requires appropriate services for all students including students with disabilities and English learners

State charter school regulations require that charter school applications include “the school’s plans for identifying and successfully serving students with disabilities, students who are English language learners, students who are academically behind, and gifted students, including but not limited to compliance with applicable laws and regulations.”^{xlviii} In addition, charter school contracts must include an assurance that it will

Improve academic achievement ... by increasing academic achievement for all groups of students in which the number of students in a category is sufficient to yield statistically valid information, including: (i) economically disadvantaged students, (ii) students from major racial and ethnic groups, (iii) students with disabilities, and (iv) students with limited English proficiency.^{xlix}

Authorizer Funding

- Provides a mechanism for guaranteed access to authorizer funding
- Includes a process for holding authorizers accountable for how funding is used

Provides a mechanism for guaranteed access to authorizer funding

The law does not provide access to authorizer funding.

State has processes to hold authorizers accountable for how funding is used

As the law does not provide access to authorizer funding, it similarly does not include a provision for holding authorizers accountable for how funding is used.

Endnotes

- ⁱ Language in ESSA Framework Details section below was taken directly and adapted from Title IV, Part C of the Elementary and Secondary Education Act of 1965, as amended by the Every Student Succeeds Act (ESSA), §§ 4301 to 4311 (20 U.S.C. §§ 7221 to 7221j)—<https://oese.ed.gov/offices/office-of-discretionary-grants-support-services/charter-school-programs/state-entities/funding-and-legislation/>; Language in the NACSA: Framework Details section below were taken directly or adapted from the following resources: National Association of Charter School Authorizers: Quality Authorizing Practices; Reinvigorating the Pipeline; Authorizer Accountability Model Language; Higher Education Institution Authorizers; Leadership, Commitment, Judgment: Elements of Successful Charter School Authorizing; Findings from the Quality Practice Project; Principles and Standards for Quality Charter School Authorizing; Putting an End to Authorizer Shipping; Language in the Alliance: Framework Details section below were taken directly or adapted from the following resources: National Alliance for Public Charter Schools: 2019 State Charter Law Ranking—<https://www.publiccharters.org/ranking-state-public-charter-school-laws-2019>; 2016 Model Charter School Law—<https://www.publiccharters.org/sites/default/files/migrated/wp-content/uploads/2016/10/2016ModelCharterSchoolLaw.pdf>
- ⁱⁱ Rhode Island Department of Education, Office of College and Career Readiness, *Rhode Island Charter Public Schools FAQs*. Retrieved from <https://www.ride.ri.gov/Portals/o/Uploads/Documents/Students-and-Families-Great-Schools/Charter-Schools/FAQs.pdf>
- ⁱⁱⁱ R.I. Gen. Laws § 16-77-3.1(b).
- ^{iv} Rhode Island Department of Education, Office of College and Career Readiness, *Rhode Island Charter Public Schools FAQs*. Retrieved from <https://www.ride.ri.gov/Portals/o/Uploads/Documents/Students-and-Families-Great-Schools/Charter-Schools/FAQs.pdf>
- ^v *Id.*
- ^{vi} *Id.*
- ^{vii} *Id.* See also R.I. Gen. Laws § 16-77-3.1(g).
- ^{viii} R.I. Gen. Laws § 16-77-6.1 as amended by P.L. 2016, Ch. 466, § 1.
- ^{ix} 200-RICR-20-05-2.2.4 and 2.4.1.
- ^x 200-RICR-20-05-2.2.2(D).
- ^{xi} 200-RICR-20-05-2.2.2(E).
- ^{xii} See R.I. Gen. Laws §§ 16-77.2-2, 16-77.3-2, and 16-77.4-2, respectively.
- ^{xiii} 200-RICR-20-05-2.2.1.
- ^{xiv} See R.I. Gen. Laws §§ 16-77.2-2, 16-77.3-2, and 16-77.4-2, respectively.
- ^{xv} R.I. Gen. Laws § 16-77.2-3.
- ^{xvi} 200-RICR-20-05-2.2.1.
- ^{xvii} 200-RICR-20-05-2.2.3(E).
- ^{xviii} R.I. Gen. Laws § 16-77.2-3(c).
- ^{xix} R.I. Gen. Laws § 16-77.2-2.
- ^{xx} *Id.*
- ^{xxi} R.I. Gen. Laws §§ 16-77.3-2(b) and 16-77.4-3.
- ^{xxii} 200-RICR-20-05-2.2.4(B).
- ^{xxiii} 200-RICR-20-05-2.2.3(E).
- ^{xxiv} 200-RICR-20-05-2.2.4(B)(8).

- xxv 200-RICR-20-05-2.2.1.
- xxvi *Id.*
- xxvii 200-RICR-20-05-2.2.4(B)(8).
- xxviii *Id.*
- xxix R.I. Gen. Laws § 16-77-3.1.
- xxx 200-RICR-20-05-2.10.
- xxxi 200-RICR-20-05-2.2.4(B)(3).
- xxxii 200-RICR-20-05-2.4.2
- xxxiii 2017 CSP application.
- xxxiv 200-RICR-20-05-2.2.4(B)(8)(b).
- xxxv *Id.*
- xxxvi 200-RICR-20-05-2.5.2.
- xxxvii R.I. Gen. Laws § 16-77-5.1(b).
- xxxviii 200-RICR-20-05-2.5.1.
- xxxix Rhode Island Department of Education, Office of College and Career Readiness, *Rhode Island Charter Public Schools FAQs*. Retrieved from <https://www.ride.ri.gov/Portals/o/Uploads/Documents/Students-and-Families-Great-Schools/Charter-Schools/FAQs.pdf>
- xl 200-RICR-20-05-2.5.4.
- xli *Id.*
- xlii Interview on March 9, 2020 with Wendy Wallace, Prepare RI Fellow, Rhode Island Department of Education.
- xliii 200-RICR-20-10-1.1.2.
- xliv 2017 CSP application.
- xlv *Id.*
- xlvi 200-RICR-20-05-2.6.2.
- xlvii 200-RICR-20-05-2.2.2(D).
- xlviii 200-RICR-20-05-2.2.2(D)(2).
- xliv 200-RICR-20-05-2.2.4(B)(8)(b).