

September 6, 2013

Washington State Board of Education
600 Washington St. SE
Olympia, WA 98504

Dear Board Members:

On behalf of the Washington State Charter School Commission, I thank you for the opportunity to review your proposed WAC 180-19-210 Annual Report by Authorizer. On balance we found the draft rules to be thorough, balanced and realistic.

There are two small suggestions that we would like the State Board of Education to consider.

First, we found the phrase “in statistical relation to” in WAC 180-19-210(2)(f)(ii) potentially confusing, and would suggest substituting the phrase “in comparison to” instead.

Second, we believe that we and all approved authorizers in Washington should also be asked to report on charter school organizational performance and compliance for the schools we oversee, and so believe that you should add a requirement to that effect. This is a specific category in the Commission’s performance framework, and includes elements such as compliance with state and federal laws; health, safety and discipline issues; non-profit board performance; and admissions and retention practices and statistics.

Once again, we thank you for this opportunity to review and comment on your proposed Annual Reporting rules, and I stand ready to respond to any questions or concerns that you might have about our suggestions.

Respectfully submitted,

/s/ Steve Sundquist

Steve Sundquist, Chair
On behalf of the Washington State Charter School Commission