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**UEN Testimony: Charter School Administrator Credential Proposed Rules**

**ARC 5936C** <https://www.legis.iowa.gov/docs/aco/arc/5936C.pdf> **Oct. 26, 2021**

Thank you to members of the Board of Education Examiners for considering stakeholder input concerning this proposal: **New rule 282 – 22.13(272)**

The Urban Education Network of Iowa, composed of 20 Iowa public school districts that enroll nearly 40% of the students in Iowa public schools, provides the following comments regarding the subject rules proposal.

UEN is very concerned about the lack of criteria for obtaining a charter school administrator credential as proposed in these rules. UEN and other education stakeholders specifically requested an administrator credential to confirm qualification of an administrator to lead a charter school. Charter school leadership may require different skills than traditional school leadership, which we acknowledge, but some demonstration of possessing those skills, whether through experience or postsecondary degree, is critical for the safety and success of children attending an Iowa public charter school. Additionally, with the experience of charter schools nationally closing for financial reasons or never getting off the ground, disrupting the educational experience of students, a heightened level of credential is warranted.

**Background:**

HF 813, Charter Schools, enacted in the 2021 Session, as amended by HF 847 Education Flexibility, included three possible routes to be a credentialed charter school administrator; 1) licensure for school administration, 2) teacher licensure and 3) an alternative charter school authorization to be established by the BOEE, which is why these rules are being promulgated.

For this third option, the proposed rules state only two requirements; complete a background check and have verification from a charter school governing board of a job offer. Additionally, confirmation of completing the child and dependent adult abuse trainings as stated in Administrative Code 282—subrule 20.3(4) is not verified until renewal of the license five years later.

**Concern:**

As written in HF 813, there is no requirement to elect or vet the governing board members of a proposed charter school, only half of whom are required to live in the geographic region in which the charter school is located. As such, it is even more critical to set a high standard for a charter school administrator without school leadership experience or chapter 272 licensure.

Although there are some charter schools that may provide benefits for students, there are many that do not. [Forbes Magazine, Sept. 28, 2018](https://www.forbes.com/sites/petergreene/2018/09/28/the-promises-charter-schools-dont-make/?sh=652e5f2967ad) quotes a study by the Center for Media and Democracy that found 2,500 charter schools closed between 2000 and 2013. Sometimes at the end of the year, sometimes in the middle, or sometimes having never really opened. Sometimes they close for not meeting the expectations in the contract, but the study reported that was rare. It’s usually financial. For context, [NCES reports](https://nces.ed.gov/fastfacts/display.asp?id=30) that by 2019, there were approximately 7,500 public charter schools operating in the nation. Another study reported in the [Washington Post](https://www.washingtonpost.com/education/2020/08/06/new-report-finds-high-closure-rates-charter-schools-over-time/) last August, analyzed charter schools that opened between 1998 and 2017 and found the following: 18% had closed within 3 years of opening; 25% closed with 5 years; 40% closed within 10 years; and only 5 of 77 groups of charters were still open after 15 years.

The stakes are high for students and families who respond to marketing by businesses running charter schools, only to find themselves without the school they expected. This means the governing board’s selection of an administrator is also high stakes. Charter school advocates may say that educational leadership experience is not necessary to run a charter school, which is a business. If this belief is a driver of the charter school movement in Iowa, it is up to the state executive branch, through BOEE authorization and state Board of Education oversight, to ensure that Iowa’s charter schools are of high quality. A demonstration of business experience and other criteria, as a minimum bar to reach, should be included in the BOEE’s rules for a Charter School Administrator Authorization.

Members of the Urban Education Network encourage the BOEE to consider additional criteria for the charter school administrator authorization:

* BA degree or other postsecondary credential demonstrating a sufficient level of education
* Experience in leadership, management and evaluation of employees in an organization of at least similar size
* A credit check in addition to the regular background checks since charter schools typically involve fundraising and additional money management without as much oversight as public schools (charters are not required to have a licensed school business official)
* A national license search to ensure the applicant did not have a teacher, coach or administrative license in another state (or in Iowa) that was pulled for any ethical violation or compliance shortfall
* Proof of completing the child and dependent adult abuse trainings referenced above within the first year of employment
* Requirements for continuing education units (CEUs) related to the administrator’s job responsibilities in addition to evaluator training

Thank you for the opportunity to comment.

UEN Contacts and link to the proposed rules follow:

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