



GETTING DOWN — TO FACTS II —

Technical Report

Charter School Authorizing in California

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About: The *Getting Down to Facts* project seeks to create a common evidence base for understanding the current state of California school systems and lay the foundation for substantive conversations about what education policies should be sustained and what might be improved to ensure increased opportunity and success for all students in California in the decades ahead. *Getting Down to Facts II* follows approximately a decade after the first *Getting Down to Facts* effort in 2007. This technical report is one of 36 in the set of *Getting Down to Facts II* studies that cover four main areas related to state education policy: student success, governance, personnel, and funding.

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Charter School Authorizing in California

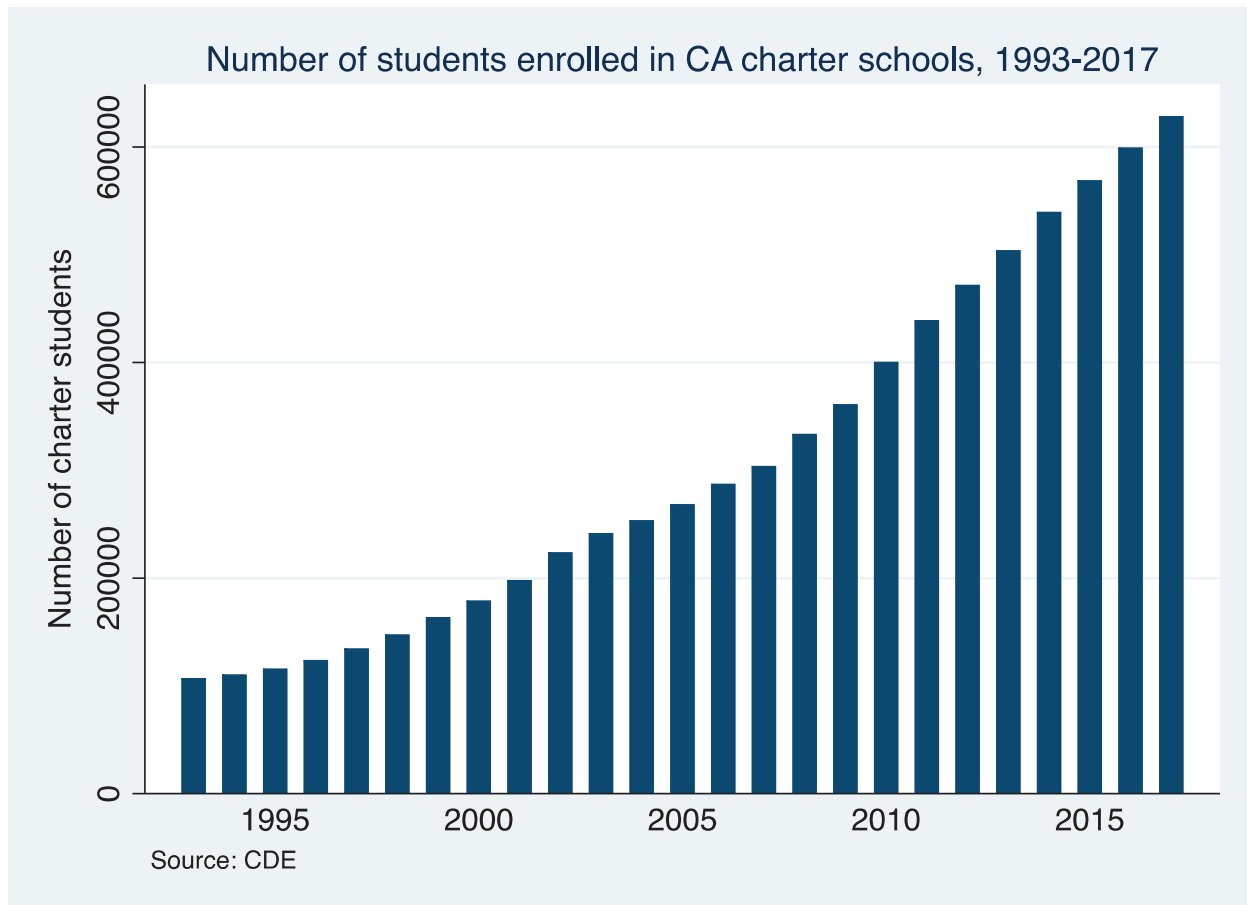
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Introduction

In 1992, California became the second state in the nation to adopt a charter school law. Figure 1 shows the steady growth of charter school enrollment in the state since that year. California now leads the nation in both number of charter schools and charter school enrollment, with more than 1,200 charter schools serving 620,000 students in the 2017-18 school year. California is also home to more charter school authorizers than any other state, with 336 different entities overseeing charter schools, including 294 local school districts, 41 county offices of education, and the State Board of Education.

Figure 1. Number of students enrolled in CA charter schools, 1993-2017



Though relatively understudied, authorizers are a critical governance structure for charter schools that influence the growth and quality of a state's charter school sector. Charter school authorizers play three essential roles: (1) vetting applications to open new charter schools, (2) monitoring existing charter schools, and (3) deciding to renew or close charter schools (Vergari, 2001). In this report, we review the state of charter school authorizing and oversight in California, compare its policies and practices to those of other states, and compile the best available evidence on how effective California's approach to authorization is in each of these three areas. The data used in this analysis is compiled from sources including the California

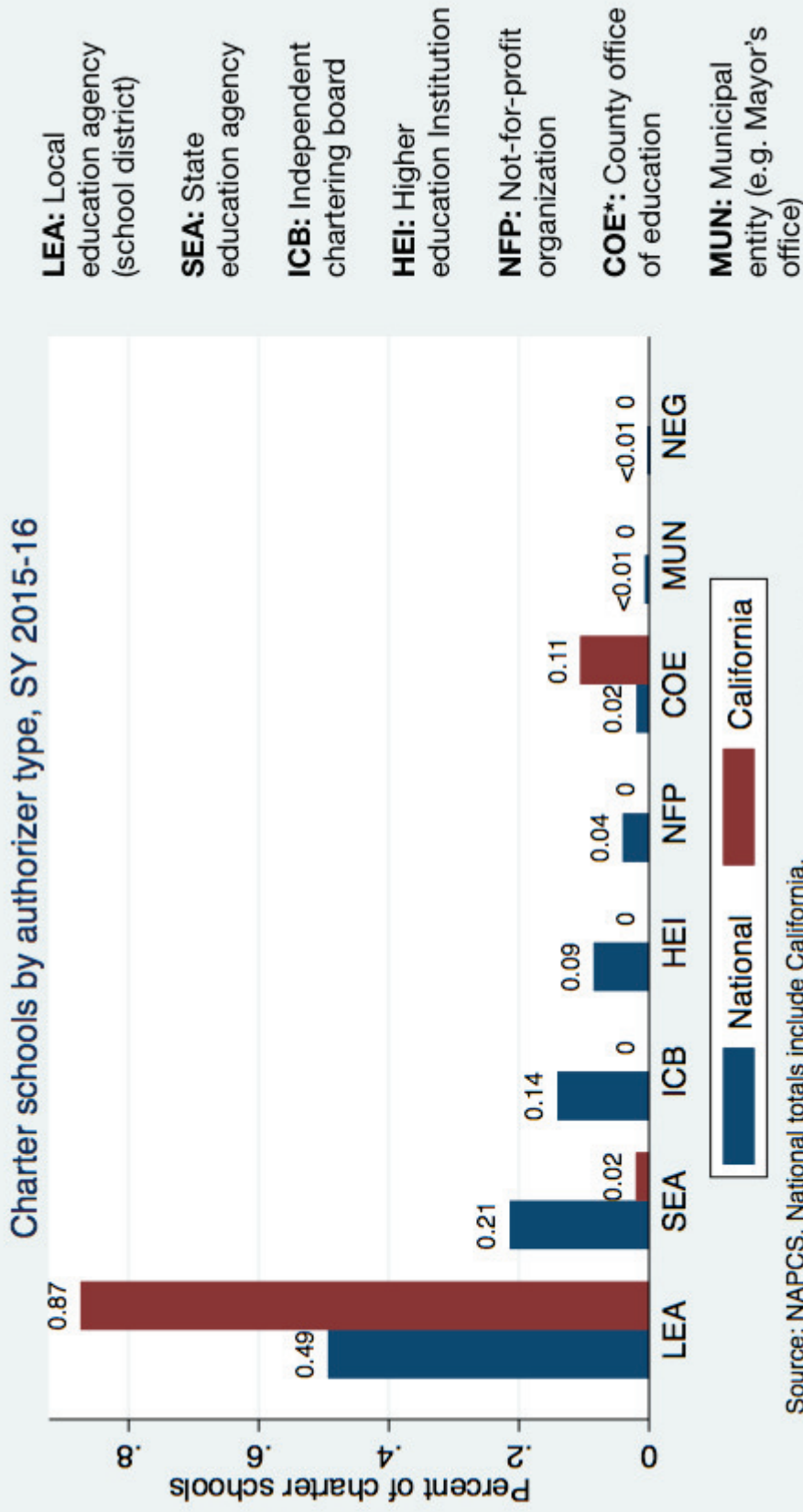
Department of Education (CDE), the Education Commission of the States (ECS), the National Association of Public Schools (NAPCS), and the California Charter School Association (CCSA).

The remainder of the report is organized as follows: In section II, we discuss who authorizes charter schools in California and compare California to other states in terms of authorizer types, funding, and accountability and reporting. In section III, we discuss the process, policies, and evidence of success for authorizers related to their first key role: opening new schools. In section IV, we consider the second primary role of authorizers, oversight and reporting, and in section V we consider the third role, making decisions about renewal and closure. We conclude in section VI by summarizing our findings and highlighting the implications of this research for improving authorizing policies and practices in California.

Who Authorizes Charter Schools in California?

The laws permitting the creation of charter schools that are now in place in 44 states determine which entities are allowed to serve as charter school authorizers. Figure 2 shows the breakdown of schools by authorizer type nationwide and in California. School districts, also known as local education agencies (LEAs), are the most common type of charter school authorizer across the country and particularly in California. In some states, such as Massachusetts and North Carolina, the ability to authorize charter schools is limited to a single statewide entity. In other states, such as Indiana and Michigan, a mix of governmental and non-governmental entities (such as non-profit organizations and higher education institutions) can serve as authorizers. Six states and Washington, D.C. have an independent chartering board (ICB), or a statewide authorizer that operates independently of the state education agency and state board of education.

Figure 2. Charter schools by authorizer type, SY 2015-2016



Source: NAPCS. National totals include California.
 *Only in CA. Does not include county offices that also serve as school districts in other states.

Charter school authorization in California is highly decentralized, with state law establishing school districts as the primary authorizers. The state does not have an independent chartering board. LEAs, county offices of education (COEs), and the State Board of Education (SBE) are the only agencies that can authorize charter schools in California. Eighty-seven percent of charter schools in California are authorized by LEAs, with COEs and the state board authorizing 11% and 2%, respectively. Although all LEAs and COEs in California are designated as potential charter school authorizers, only about one-third (294/1,024) of LEAs currently authorize charter schools, along with most (41/58) COEs.

As a byproduct of this decentralized approach, California is home to many small charter authorizers and a few very large authorizers. Figure 3 shows the breakdown of charter school authorizers in California by the number of schools overseen. Almost ninety-percent of the state’s 336 charter school authorizers oversee five or fewer schools, with 45% of all authorizers overseeing a single school. Table 1 shows the number of charter schools and student enrollment in charter schools for the five largest authorizers in California. These five authorizers oversee the schools attended by about one third of all charter school students in the state, with almost 25% of all charter school students enrolled in schools overseen by the Los Angeles Unified School District (LAUSD) alone.

Figure 3. Authorizers in CA by number of charter schools overseen, SY 2017-2018

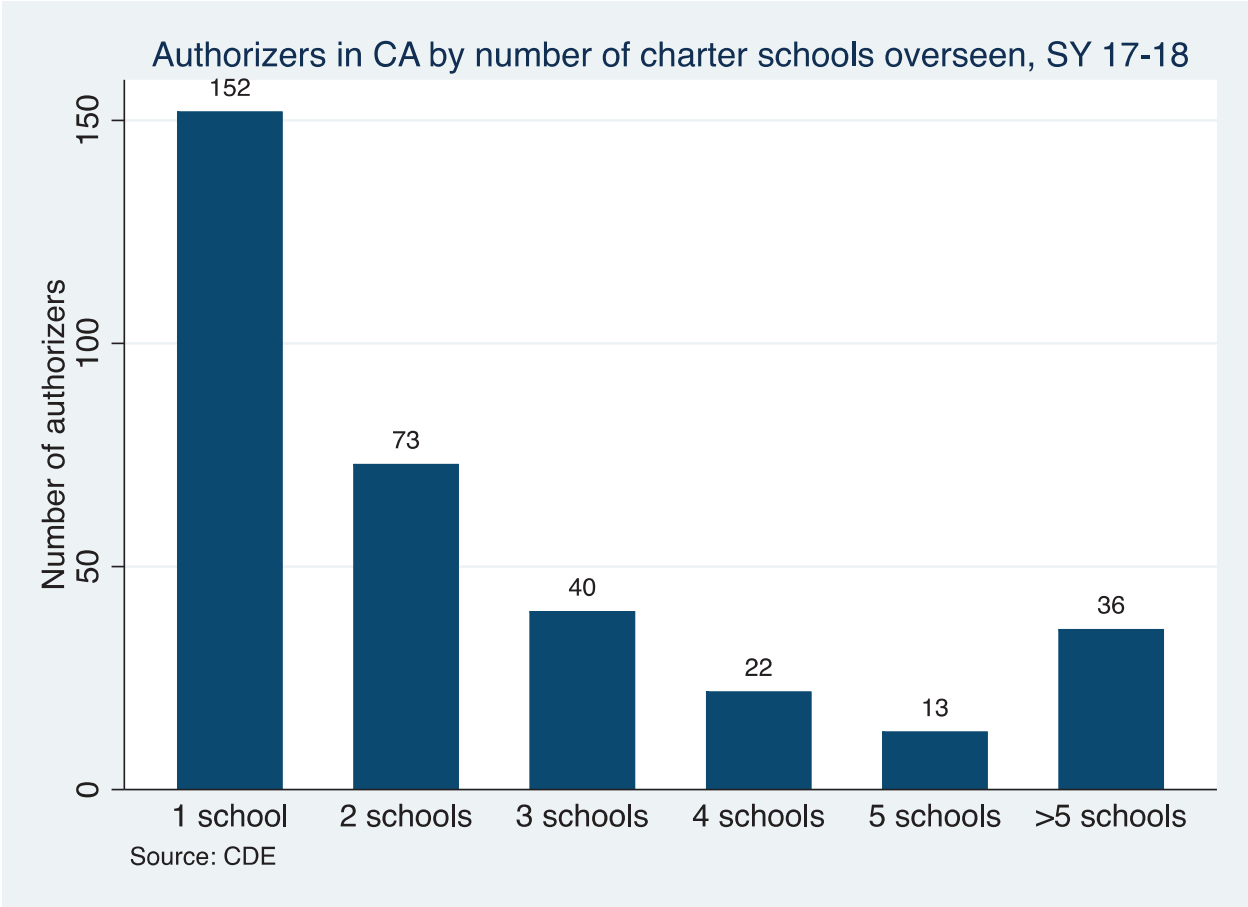


Table 1. Largest charter school authorizers in California, SY 2017-2018

Largest charter school authorizers in California, SY 2017-18				
No.	Authorizer Name	Type	Number of Schools	Enrollment
1	Los Angeles Unified	LEA	277	154,407
2	San Diego Unified	LEA	48	21,599
3	Oakland Unified	LEA	35	13,135
4	Santa Clara County Office of Education	COE	22	10,171
5	Los Angeles County Office of Education	COE	18	5,325

Nationally, authorizing activities are paid for in three ways: through authorizer budgets, through line-item state appropriations,¹ or through fees claimed by authorizers from funds allocated to the charter schools they oversee (Cass, 2009). Charter school authorizers in California can claim an authorizing fee of up to 1% of the per-pupil funding allocated to a charter school, or up to 3% of per-pupil funding if the authorizer provides substantially rent-free facilities to the charter school (Cal. Educ Code. § 47613). As of 2009, the average authorizing fee in the fourteen states with laws using this funding mechanism was 3%, putting California at the lower-end of authorizer funding for the many authorizers that do not provide facilities (Cass, 2009). These fees provide modest support to authorizers in California, especially those that oversee a small number of charter schools. A district overseeing its first charter school with an initial enrollment of 100 students, for example, might generate only \$11,000 in authorizer fees, less than a quarter of a full-time employee’s salary.²

Charter school authorizers in California operate with little oversight from the state. Although the SBE is able to revoke a school’s charter without the authorizer’s involvement in some cases, there is no mechanism for the state to prevent an LEA or COE with a poor track record from continuing to authorize schools, nor are there any public performance reports produced at the authorizer level. The actions of charter school authorizers have come under increasing scrutiny nationally, with several states adopting laws to increase accountability and transparency for authorizers. In 2015, Ohio legislators passed a bill that significantly increased authorizer accountability, including by establishing a rating system for authorizers and clarifying and strengthening the state’s ability to revoke authorizing rights in case of poor performance (Aldis & Churchill, 2015). Most (28) of the 44 states with charter school laws require some kind

¹ Line-item appropriations from state budgets are most commonly used for state education agencies and independent chartering boards.

² This estimate assumes a per-pupil allocation of \$11,000.

of authorizer-level performance reporting, and seventeen states have laws that allow the state to suspend authorizing rights in some circumstances (Education Commission of the States, 2018).

Research indicates that different kinds of agencies approach the work of charter school authorizing with different capacities, motivations, and expertise (Vergari, 2001). School districts have the most direct experience overseeing schools, but may view authorizing charter schools as a distraction from their primary responsibilities or an unwanted source of competition for scarce per-pupil resources, making them disinclined to approve or renew charter applications (Zimmer, Gill, Attridge, & Obenauf, 2014). Meanwhile, non-district authorizers that receive fees from the schools they authorize may have a financial incentive to keep charter schools open even if they are struggling academically. Because of the disincentive for school districts to allow charter schools to operate within their boundaries, the National Association of Public Charter Schools considers the availability of non-district authorizers to be an important component of a state’s charter school law (Ziebarth & Palmer, 2018). The robust growth of the charter sector in California suggests that the potential anti-charter bias of district authorizers has not prevented the sector from achieving scale, however, likely because of the robust application appeal process discussed in section III.

While districts have advantages and disadvantages as authorizers, the limited empirical evidence available from other states does not indicate that the performance of charter schools varies systematically by the type of entity serving as authorizer (Carlson, Lavery, & Witte, 2012; Gleason, Clark, Tuttle, & Dwoyer, 2010; Zimmer et al, 2014).³ That is, there is no conclusive evidence to support claims that the charter schools authorized by local school districts, for example, are more or less effective than those authorized by other entities. However, the lack of evidence for differences in school quality across broad types of authorizers does not imply that authorizers do not vary in their effectiveness. Organizations like the National Association of Charter School Authorizers have therefore sought to codify the practices of specific authorizers with a track record of success and to encourage states and/or specific authorizers to adopt those practices as a matter of law or policy (NACSA, 2015). While California does not, half of all states with charter school laws require that authorizers meet professional standards for authorizing practices (Education Commission of the States, 2018).

In the sections that follow, we describe the policies and practices in California related to each of the three main roles of charter authorizers—vetting applications to open new schools, overseeing existing schools, and making decisions on renewal/revocation—and compare these against other states and best practices promoted by professional organizations.

³ Studying charter schools in Ohio, Zimmer et al. (2014) find that the achievement effects of charter schools authorized by district, county, and state-level agencies are not statistically distinguishable, but that the achievement effects of charter schools authorized by non-profits are lower than those of schools authorized by other entities.

Authorizer Role 1: Opening New Charter Schools

By vetting applications for new charter schools, charter school authorizers exercise front-end accountability over the charter sector (Anderson & Finnigan, 2001). In this section, we consider the rules and regulations around opening new charter schools in California and their implications for the growth and variety of charter schools in the state.

Prospective charter school operators in California generally submit applications first to the school district in which the charter school will be located.⁴ Per state law, charter school applications must address sixteen topics, including annual goals for student achievement. Charter school authorizers are able to structure their applications and request additional information at their discretion. State law stipulates that charter school applications should be approved unless one of five specific criteria for denial are met, emphasizing that “the chartering authority shall be guided by the intent of the Legislature that charter schools are and should become an integral part of the California educational system and that the establishment of charter schools should be encouraged” (Cal. Educ Code. § 47605, B). If a charter application is denied, the authorizer denying application must produce written findings explaining the reasons for denial. The negative impact of charter school openings on the finances of a local school district is not currently an acceptable criterion for denying a charter school application, though bills have been proposed (unsuccessfully) to incorporate this as a valid consideration (S. 1362). If an application is denied by the local LEA, the applicant may appeal to their local COE or to the SBE. If the COE or SBE grants the appeal, the COE or SBE becomes the charter school’s authorizer.

The regulations around opening new charter schools in California are notable for several reasons. First, with few exceptions, the application process emphasizes local control over authorizing decisions, effectively giving the district in which the charter will operate the right of first refusal. Second, the emphasis on LEAs as the primary authorizers is balanced by a relatively generous appeals process for application decisions. Given the possibility of conflict between school districts and charter schools, the ability of charter schools to appeal a denial increases the likelihood that applications are considered in a manner consistent with the statute. The option to appeal charter school decisions is exercised frequently, and often changes the outcome of application decisions. From 2003 to 2017, for instance, the Santa Clara County Office of Education (SCCOE) granted 17 of the 25 petitions it received on appeal from LEAs (SCCOE, 2017). Third, California charter law encourages—and does not impose binding limits on—the growth of charter schools. Though the number of charter schools is nominally capped by statute, with 100 more schools allowed every year from a base of 250 in 1998-99, the total number of charters is not nearing and has not neared this limit to date, so the cap has not been binding (Cal. Educ Code. § 47602). Fourth, the fact that California does not allow entities such as non-profit organizations and higher education institutions to authorize charter schools limits

⁴ Charter applications for county and statewide benefit schools may be submitted directly to the COE and SBE, respectively. In order to open a countywide (statewide) benefit school, an applicant must prove that the services provided by the charter will be beneficial to the student population and that the student population could not be served as well by a charter operating in a single district (or county) (Cal. Educ Code. §§ 47605.5, 47605.8).

the potential for charter schools to engage in “authorizer shopping,” or the practice of seeking out authorizers with less rigorous standards that has been observed in states where multiple entities can authorize charter schools in the same geographic area (Boast et al., 2016). Finally, California charter law is distinctive in the variety of educational and governance models for charter schools that it permits. Both non-profit charter management organizations (CMOs) and for-profit education management organizations (EMOs) may operate charter schools. In addition to start-up charter schools, California law allows traditional public schools (and entire school districts) to convert to charter schools under certain conditions. The state’s so-called “parent trigger” law also permits dissatisfied families to convert traditional public schools to charter schools in some circumstances (Cal. Educ Code §§ 53000-53303). California also explicitly permits the establishment of nonclassroom-based charter schools, which include independent study, home study, and virtual school programs.

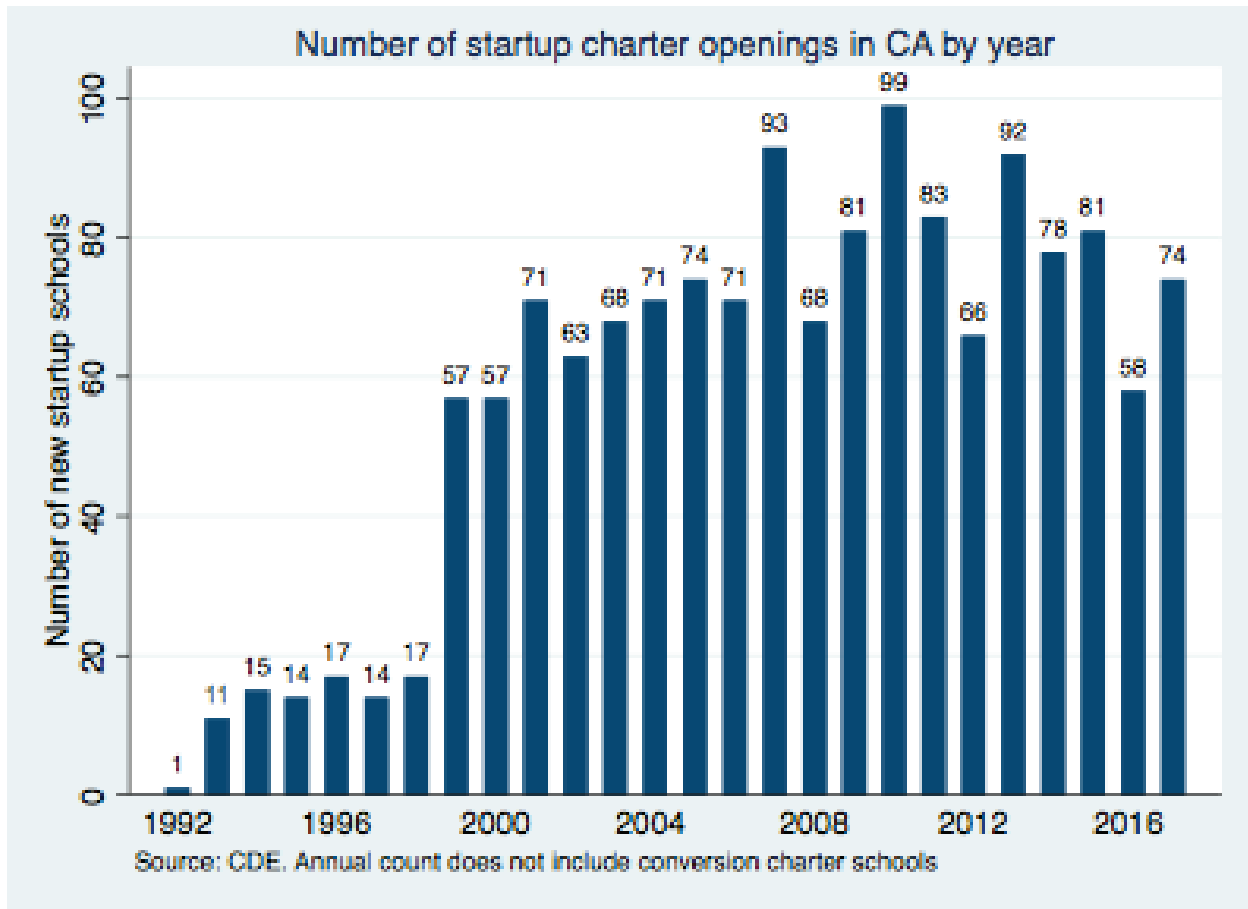
Within this regulatory environment, California has developed a charter school sector that is large, growing, and remarkably varied in terms of school types, operators, and governance models. Figure 4 shows the number of new charter schools opened in California every year since 1992. Ten percent of public school students in California now attend a charter school, and new charter school openings, though lower than at their peak, remain strong. Two-thirds of start-up charter schools in California are free-standing (or “single site”) charters, while the remaining third are affiliated with CMO or EMO networks.⁵ California’s CMOs include a number of nationally-recognized networks with innovative school models, including Summit Public Schools and Rocketship Public Schools. As of 2017-18, California also had 211 conversion charters, which converted to charter schools from traditional public schools with the support of the majority of the current teaching staff. The large number of conversion schools is one reason why the state has a comparatively large number of charter schools in which teachers are represented by a union—as many as 25 percent of all charters as of 2013 (Matsudaira & Patterson, 2017). California is also home to 242 nonclassroom-based schools, with 40 exclusively virtual schools.⁶ Finally, there are also over one hundred alternative charter schools in California that serve high-risk student populations, such as dropouts.⁷

⁵EMOs form a relatively small share of the charter sector compared to CMOs, with 60 EMO-affiliated schools and 386 CMO-affiliated schools as of the 2015-16 school year

⁶ The SBE maintains some regulatory authority over nonclassroom-based charter schools by requiring that they apply to the SBE in order to receive funds, a process that includes additional performance and operational requirements for virtual/online charter schools (California Code of Regulations § 11963.5).

⁷ Alternative schools were identified based on Dashboard Alternative School Status (DASS) in the CDE.

Figure 4. Number of startup charter openings in CA by year



The academic performance of schools in this diverse sector varies. The best available evidence on charter school performance in California comes from studies produced by the Center for Research on Education Outcomes (CREDO) at Stanford, which uses a “virtual control record” method to compare the academic growth made by charter students to that of similar students who do not attend charter schools. CREDO finds that student learning gains are considerably stronger, on average, for charter school students in California’s urban areas (particularly in Los Angeles) and in schools operated by CMOs than for similar students in traditional public schools, but modestly lower for students attending charter schools in non-urban areas and for students attending virtual schools (CREDO, 2014A; CREDO, 2014B; CREDO, 2015).

Authorizer Role 2: Oversight and Reporting

Charter school authorizers are also responsible for monitoring the academic, operational, and financial well-being of the schools they oversee. Authorizers do not directly manage charter schools and are not responsible for instituting changes in the day-to-day

operations of a charter school; instead, they are tasked with gathering information to identify problems and inform decisions about charter renewals and revocations.

California law requires few specific activities from charter authorizers in terms of oversight, mandating only that authorizers (1) designate a contact person for the charter school, (2) visit the charter school once a year, (3) ensure compliance with all required reports, (4) monitor the fiscal condition of the charter school, and (5) inform the state of new charters, renewal decisions, and closures (Cal. Educ Code. § 47604.3). While the few authorizers that oversee many schools have large charter school offices and clearly developed oversight procedures, in the many very small charter school authorizers these responsibilities may fall on the shoulders of a single employee.

A unique feature of charter authorizing in California is that the petition submitted by the prospective charter school operator becomes the charter contract itself, though some charter school authorizers also require execution of a separate Memorandum of Understanding (MOU) between the authorizer and school. A 2002 survey of California charter schools found that 67% of responding schools had an MOU with their authorizer at that time (Zimmer et al, 2003). Charter school petitions are extremely long, often hundreds of pages, and include minute details about the founders' vision for the school. Absent a separate document specifying the responsibilities of the charter school and authorizer, charter schools are vulnerable to sanctions from their authorizer for small deviations from what is written in their petitions (NACSA, 2016). In practice, the oversight relationship between charter schools and authorizers in California typically focuses on ensuring legal compliance, and a recent study of authorizers in the state suggests that both charters and authorizers struggle with general confusion about what exactly is required from a charter school in order to be deemed in compliance (Mayo, 2014).

Authorizer Role 3: Renewal and Closure

Perhaps the most important role that authorizers play is making decisions about whether to revoke, renew, or decline to renew a school's charter. Revocation may occur at any time during a charter school's tenure. Charter school authorizers and the SBE both have the authority to revoke the charter if there are serious violations of the charter contract or state law, or in cases of financial mismanagement. Renewal and non-renewal decisions are made once a charter school has reached the end of its charter term, which is typically five years. At this time, a charter school must apply for renewal in order to keep operating. The requirements for renewal petitions is, by statute, the same as for an initial charter, emphasizing the charter school's goals for future achievement and its instructional vision (Cal. Educ Code. § 47605.5). Revocation and non-renewal decisions made by an LEA may be appealed to the COE or SBE, similar to initial applications.

The lack of a distinct process for renewing a school's charter has important implications for the character of renewal decisions. In particular, the content of renewal petitions typically emphasizes future performance goals instead of reflecting on past performance. This focus runs at odds with the statutory guidance around renewal decisions, which states that authorizers "shall consider increases in pupil academic achievement for all groups of pupils served by the

charter school as the most important factor in determining whether to grant a charter renewal” (Cal. Educ Code. § 47607). In 2005, California adopted minimum performance standards for charter school renewal. Charter schools were required to meet at least one of four performance standards in order to be renewed, including three standards based on the now-outdated Academic Performance Index (API) and a fourth, more subjective standard requiring the authorizer’s determination that “the academic performance of the charter school is at least equal to the academic performance of the public schools that the charter school pupils would otherwise have been required to attend, as well as the academic performance of the schools in the school district in which the charter school is located, taking into account the composition of the pupil population served at the school” (Cal. Educ Code. § 47607). The three API-based performance standards have not been updated since the last API was assigned to schools in 2013, rendering them moot. The latest guidance from the California Department of Education on renewal decisions does not specify performance targets or ways of comparing the performance of charter schools to other local options, but permits authorizers to “consider a range of options in determining increases in pupil academic achievement for charter renewals” (CDE, May 13, 2014).

Figure 5 shows the rate of charter school closure in California by year for the last ten years. The average annual closure rate of charter schools in California in this period is 3%, in line with the national closure rate of about 3-4% per year (Mead, Mitchel, & Rotherham, 2015). Thirty percent of new charter schools that have ever opened in California have closed, and only about three-quarters of all charter schools make it through their first five years. Figure 6 breaks down closures for start-up charters in California by years in operation. Forty-three percent of charter schools that close do so within their first five years of operation.

Figure 5. Closure rate for charter schools in California, 2007-2017

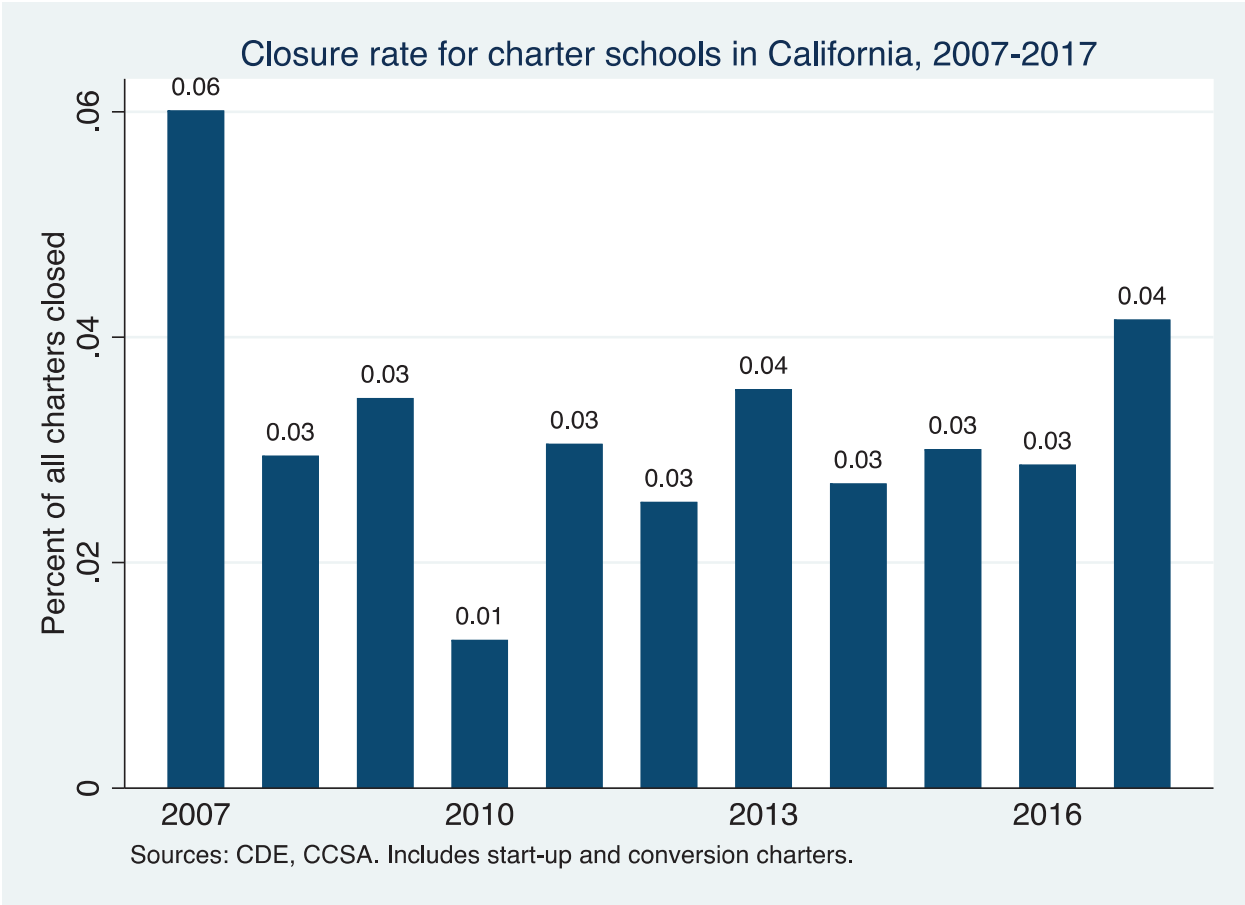
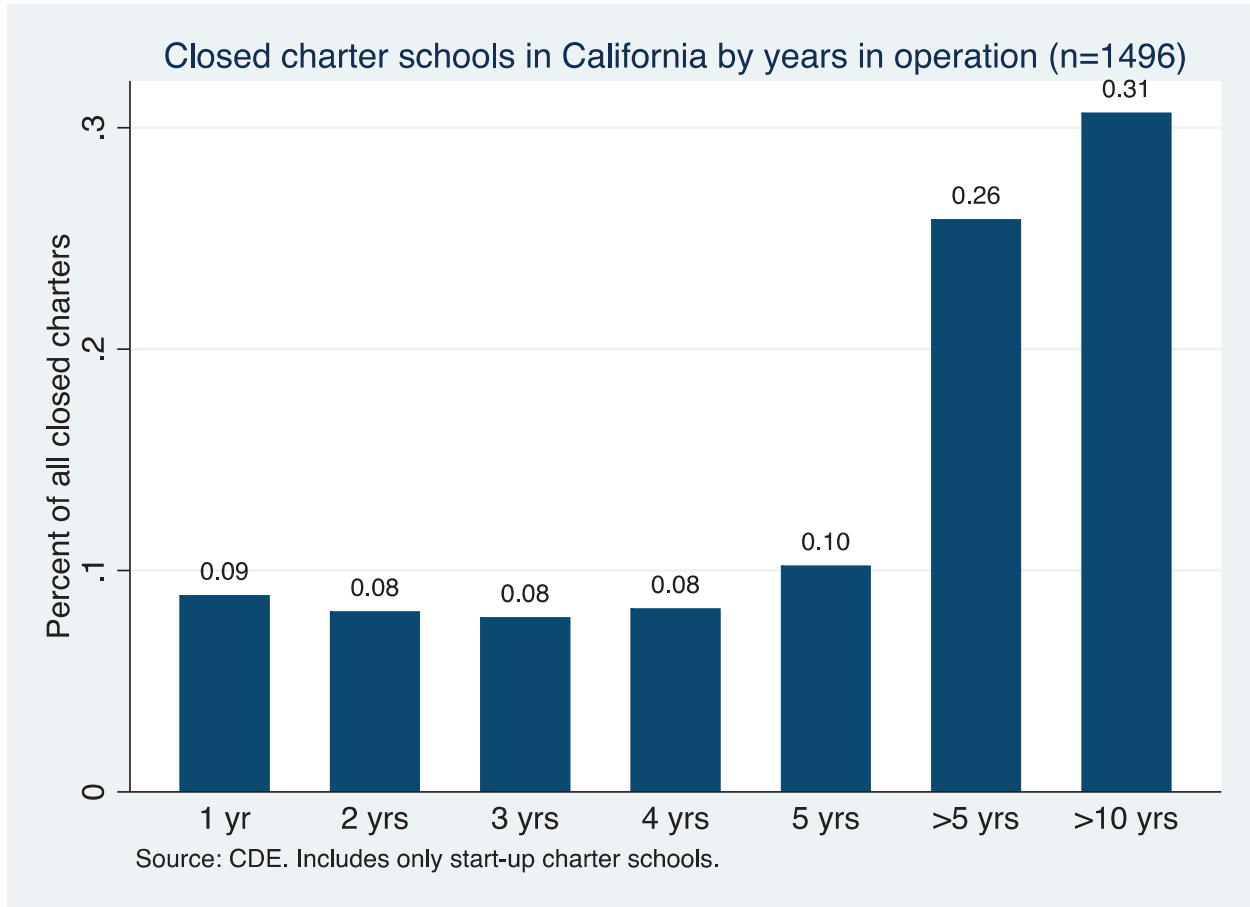


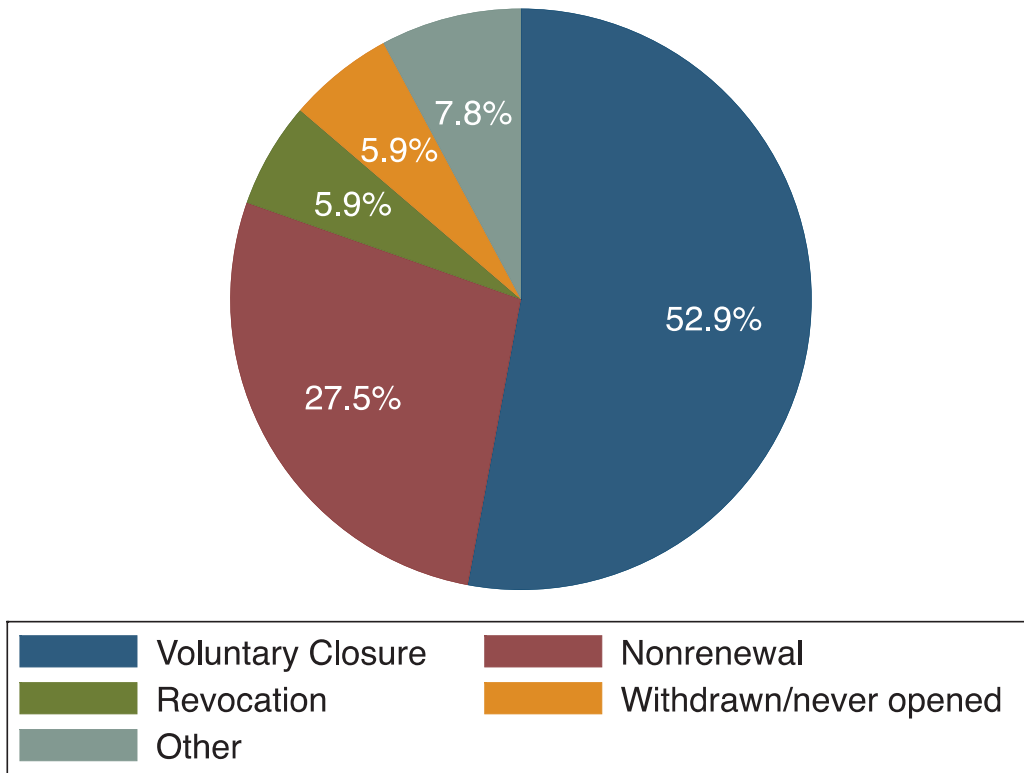
Figure 6. Closed charter schools in California by years in operation



Direct authorizer actions are not the primary reason for charter school closure in California. In 2014, an estimated 95% of renewal petitions in California were approved (NACSA, 2016). Figure 7 shows the nature of charter school closures in the 2016-17 school year, which are tracked informally by the California Department of Education (CDE). In this year, most charter school closures (27/51 total) were classified as “voluntary,” or not a result of authorizer non-renewal or revocation. While these closures did not result from formal authorizer actions, it is possible that many of the schools that closed “voluntarily” did so in consultation with or at the recommendation of their authorizers.

Figure 7. Reported reasons for charter closure in California

Reported reasons for charter closure in California, FY 2016-17 (n=51)



Source: CDE.

State-level data on the reasons closure, revocation, or non-renewal are not currently available. National research suggests, however, that most charter schools that close do not do so because of academic performance, with financial challenges the most common reason cited (Consoletti, 2011). An update to CREDO’s 2014 report on charter school performance in California prepared for this project found that 23% of the schools CREDO had identified as having both low levels of achievement and low achievement growth in 2010 had closed by the 2016-17 school year (Raymond, 2018 GDTFII). Although this represents a higher closure rate for low-performing charter schools than other states, it also suggests that many authorizers in California have allowed low-performing schools to remain in operation. There are several reasons why authorizers may be reluctant to close a low-performing school. Closing a school is politically difficult and resource intensive, regardless of the regulatory environment. Furthermore, authorizers in California may not feel they have the legal standing to decide to close a school based on academic performance given the broad range of possible performance metrics to consider and the likelihood of appeal.

Discussion

California's approach to charter school authorization, which has remained essentially unchanged since the state enacted its charter law in 1992, is highly decentralized: Every school district is designated as a potential charter school authorizer, regardless of their capacity or intent, and authorizers act with minimal oversight, guidance, or accountability. This decentralized approach, combined with the multi-tiered appeals process through which denied charter petitions can be approved by COEs or the SBE, has facilitated the emergence of the nation's largest charter sector, a strong track record of performance in the state's urban areas, and several examples of noteworthy innovations. It has also resulted in a situation in which almost 90% of the state's 300+ authorizers oversee five or fewer schools, with 45% of all authorizers overseeing just one school.

Charter school authorizers in California, and the many very small authorizers in particular, face several challenges. First, charter school authorizers in California are relatively poorly funded, with most authorizers limited to collecting 1% of the revenue of the schools they oversee. While large authorizers are likely to have the resources and expertise to develop robust systems for overseeing charter schools, small authorizers—and new authorizers in particular—may be less able to develop this capacity without additional support. Since authorizer fees necessarily reduce the funds that charter schools receive for day-to-day operations, it may not be desirable to increase authorizer fees across the board. Instead, California might consider other ways to provide additional funding for new or very small charter authorizers. For example, the National Association of Charter School Authorizers (NACSA) suggests that states appropriate a baseline level of resources for charter school authorizers in the year before the first charter opens (Cass, 2009).

Second, California authorizing policies provide only limited clarity about what is expected and required of charter school authorizers and the schools they oversee. The state could address this situation by requiring that charter school authorizers formally adopt a set of standards for authorizing, as 22 other states already do, or by providing authorizers with feedback on their performance and practices and those of other authorizers through annual, public-facing reports. As their charter sectors have grown to scale, several states have introduced new laws to improve the transparency and accountability of charter school authorizers. In Indiana, charter authorizers are required to submit a detailed annual report to the State Board of Education that must be posted on the authorizer's website. In Colorado and 15 other states, charter laws enable the state to impose sanctions on authorizers under certain circumstances, including stripping authorizers of their ability to charter schools. California can look to states like these for ways to promote higher standards for authorizing and increase the availability of information on authorizer practices and performance within the state.

Authorizers in California also lack a clear, consistent approach to judging academic performance in the context of charter school renewals. A notable feature of California's charter school authorization policies is the lack of a distinct renewal process. State law specifies that the content under consideration for charter renewals is the same as for new charter petitions,

implying that the focus is on forward-looking promises rather than past performance, while at the same time exhorting authorizers to prioritize student performance in renewal decisions. The law does specify minimum performance expectations for charter renewal, but this provision sets a low bar, includes a loophole allowing renewal based on local comparisons, and is based on the outdated API performance measurement system and has not been updated.⁸ If the state wishes to ensure authorizers take action against very low-performing charter schools by establishing a “performance floor” for charter performance, these requirements need to be updated. Regardless, charter school authorizers would benefit from clearer guidance on what should be required from charter schools in terms of both compliance and performance in order to be renewed. Requiring charter schools to execute separate MOUs with their authorizers, thereby replacing the charter petition as the binding charter contract, could reduce confusion over what is required and provide a forum for authorizers and charter school operators to explicitly state performance goals and consequences for failing to meet them.

Recent changes to the state charter law that require charter petitions to include annual goals in the same areas as the charter’s annual Local Control Accountability Plan (LCAP) represent a positive step toward streamlining and clarifying performance objectives, while also providing a way (through the annual LCAP report) to monitor progress toward these goals. Further changes could be made to the existing charter law to integrate the LCAP as the key accountability tool for authorizers, for instance by specifying that the way the academic performance of a charter school should be judged in renewal decisions is in terms of progress toward LCAP goals. Combined with measures to enhance authorizer capacity and accountability, this would help ensure that charter school authorizers in California are well positioned to build on the state’s charter sector’s successes to date in providing additional high-quality options for many California students.

⁸ Similar updates are needed for regulations around the SBE funding determination process for virtual schools, which also reference APIs (California Code of Regulations § 11963.5).

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