

# MISSISSIPPI'S CHARTER SCHOOLS:

#### **UNCHARTED TERRITORY**

#### Introduction

Historically, Mississippi has had a turbulent history with its public education system. Inumerous reports and data have consistently shown an education system, which lags behind, in academic achievement and per pupil expenditures. Decades since Brown vs Topeka Board of Education, Mississippi is still addressing some of the same inequities in its public schools. Among those are inadequate funding, white abandonment, insufficient number of available certified teachers, privatization, crumbling infrastructure and a reduction of tax base in majority minority areas.

On the heels of these issues came the introduction of school choice. The Republican super majority in the Mississippi Legislature has consistently prioritized charter school authorization, school voucher programs and other public school options over fully funding public education. As funding and school choice were debated, Governor Tate Reeves argued that additional resources should be allocated to those districts that demonstrated higher state test scores and other indicators of success rather than reward struggling districts. <sup>2</sup> School districts having had continued success are no longer the target of proposed legislation.



<sup>1</sup> Mitchell, J. (2019, February 22) Separate and unequal: For centuries, Mississippi has left its public schools in the hole. Clarion Ledger/ Mississippi Center for Investigative Reporting. Retrieved from https://www.clarionledger.com

<sup>2</sup> Dreher, A. (2017, October 23) Mississippi High Court Undercuts MAEP: School Formula Is Not a Mandate; Jackson Free Press. Retrieve from https://www.jacksonfreepress.com

# BACKGROUND ON CHARTER SCHOOLS

In 2013, Mississippi became one of 44 other states and the District of Columbia offering charter schools as a public school option.<sup>3</sup> This decisive action has brought about discourse in many minority communities because of the refusal to fully fund the Mississippi Adequate Education Program. It was very reminiscent of the Jim Crow Era when Mississippi diverted tax dollars to support private schools rather than provide adequate resources and support for traditional public schools.

Charter schools are public schools that are regulated by a governing body. Charter schools are exempt from certain laws and regulations that govern traditional public schools. They are bound to the terms of a contract, or "charter," that lays out a school's mission, academic goals, fiscal guidelines, and accountability requirements.4 Whereas traditional public schools must accept all children who wish to attend within their geographic area, charters have an application process. They may give preference to children of the charter school's applicants, governing board members, and employees, for up to 10% of school enrollment.<sup>5</sup> If student applications exceed capacity, charter schools must use a lottery system. The composition of underserved students must reflect that of the school district in which the charter school is located. This is defined as at least 80% of the school district's population of underserved students.6

Attendance at charter schools must be open to all students living in the boundaries of the school district in which the charter school is located, and to students living in a school district rated a C or lower at the time the charter school was approved or at the time the student enrolls in the charter school.<sup>7</sup> They can also limit students within a given age group or grade level.8 Charter schools also have the right of first refusal to purchase or lease at or below fair market value a closed or unused portion of a public school facility property in the school district in which the charter school is located, if the school district decides to sell or lease the public school facility or property. In addition, charter schools may negotiate and contract at or below fair market value with a school district, state institution of higher learning, public community or junior college, or any other public or for-profit or nonprofit private entity for the use of a facility for a school building



# THE MISSISSIPPI CHARTER SCHOOL AUTHORIZER BOARD



The governing body of charter schools in Mississippi is The Mississippi Charter School Authorizer Board (Board). This Board is a state agency comprised of seven appointed members responsible for oversight of the schools' operations. <sup>10</sup> The appointment of the board is as follows: The Governor appoints three members, with

one member being from each of the Supreme Court districts. The Lieutenant Governor appoints three members, one member each from the Supreme Court districts. The State Superintendent of Public Education appoints the final member. All appointments are made with the advice and consent of the Senate.<sup>11</sup>

#### Charter schools must give priority to the following:

- Students enrolled in the previous year and their siblings.
- Underserved students, defined as students eligible for the federal free and reduced-price lunch program, eligible for at risk funding, or students with special education needs. 12

#### APPROVED CHARTER SCHOOLS IN MISSISSIPPI<sup>13</sup>

CHARTER SCHOOL	CHARTER OPERATOR	SCHOOL DISTRICT	INITIAL SCHOOL YEAR	CHARTER OPERATOR
MIDTOWN PUBLIC	MIDTOWN PARTNERS INC.	JPS	2015-2016	FY 2016-FY 2020
REIMAGINE PREP	REPUBLIC SCHOOLS, INC.	JPS	2015-2016	FY 2016-FY 2020
JOEL E. SMILOW PREP	REPUBLIC SCHOOLS, INC.	JPS	2016-2017	FY 2017-FY 2021
JOEL E SMILOW COLLEGIATE	REPUBLIC SCHOOLS, INC.	JPS	2018-2019	FY 2019-FY 2023
CLARKSDALE COLLEGIATE	CLARKSDALE COLLEGIATE, INC.	CLARKSDALE MUNICIPAL	2018-2019	FY 2019-FY 2023
AMBITION PREPARATORY	AMBITION PREP. CHAR.SCHOOL	JPS	2019-2020	FY 2020-FY 2024
LEFLORE LEGACY ACADEMY	MISSISSIPPI DELTA ACADEMIES	GREENWOOD PUBLIC	2020-2021	TBD
REVIVE PREP	REPUBLIC SCHOOLS, INC.	JPS	2021-2022	TBD
REPUBLIC HIGH SCHOOL	REPUBLIC SCHOOLS, INC.	JPS	2021-2022	TBD

<sup>9,</sup> MS Code §37-28-61 (2019)

<sup>&</sup>lt;sup>3</sup>, M.A. (2018). 50-State Comparison: Charter School Policies. Denver, CO: Education Commission of the States. Retrieved from http://

www.ecs.org/charter-school-policies/.

Prothero, Arianna. (2018, August 9). Charter Schools. Education Week. Retrieved from http://www.edweek.org/ew/issues/char

ter-schools/ MS Code §37-28-23(8Wixom)(c) (2019)

<sup>6</sup> MS Code §37-28-23(5) (2019)

<sup>&</sup>lt;sup>7</sup> MS Code § 37-28-23(1) (2019 <sup>8</sup> MS Code §37-28-23(4) (2019)

<sup>&</sup>lt;sup>10</sup> MS Code §37-28-7 (2019

<sup>11</sup> MS Code § 37-28-7(3) (2019

<sup>&</sup>lt;sup>12</sup> MS Code §37-28-23(8)(b) (2019)

<sup>&</sup>lt;sup>13</sup> Joint Legislative Committee on Performance Evaluation and Expenditure Review (2019). FY 2019 Annual Report: Analysis of Funding for Mississippi Charter Schools and the Charter School Authorizer Board. (PEER Publication #637). Retrieved from https://www.peer.ms.gov/Reports/reports/rpt637.pdf

# CHARTER SCHOOL FUNDING

The funding of charter schools has been a source of great debate. Generally speaking, charters receive state and local money based on the number of students they enroll, as well as money from the federal government to provide special education services, just like traditional district schools.<sup>14</sup>

Charters can apply for and receive grants to expand charter schools. Like many other states, Mississippi does not allocate funds for charter school facilities in their funding formula. <sup>15</sup> Charter schools can also raise additional funds through private donations like public and private schools. <sup>16</sup> This opened the door for philanthropy to support the expansion of charter schools. Some of the wealthiest people in the United States have invested heavily in charter schools, including the Walton's, heirs of Walmart, Don and Doris Fischer, the founders of the Gap, Bill and Melinda Gates, Eli and Edythe Broad, Reed Hastings, the founder of Netflix, former New York City mayor Michael Bloomberg, and U.S. Secretary of Education Betsy DeVos. <sup>17</sup>

# MISSISSIPPI ADEQUATE EDUCATION PROGRAM

The Mississippi Adequate Education Program (MAEP) was passed by the Mississippi Legislature in 1994. MAEP was designed to provide funding levels necessary for school districts to provide an adequate education and defined as meeting Level 3 accreditation standards of the state's accountability accreditation model. The accreditation standards are created by the Mississippi Department of Education to assign a performance index rating annually to every school district. <sup>18</sup> Their goal was to ensure that every student is afforded an adequate educational opportunity regardless of where they reside. In order to accomplish this, the system must:

- Provide equity to districts by recognizing differences in local resources
- Provide a level of resources necessary for an adequate education<sup>19</sup>

The first year the funding formula was used to create allocations for education was in 1997.<sup>20</sup> The passage of this legislation was prompted by the inadequate funding of public school districts across Mississippi and the growing fear that the state would be

#### sued because of it.

Since the passage of this legislation, legislators have had an inconsistent track record with adhering to the formula and ensuring that schools have the budgets necessary to educate children. The insufficient funding has permitted the inequities MAEP was created to address to continue.<sup>21</sup> The last time public schools were fully funded was in the 2007-2008 school year. The Legislature has voted for full funding in two subsequent years but did mid-year budget cuts to reduce the amount allocated to education. Since that time, Mississippi's public education has been short changed by \$2.8 billion.<sup>22</sup> This school year, MAEP funding is \$250.4-million short of what state law says our students and teachers need to be successful.<sup>23</sup>

- 14, MS Code §37-28-55 (2019
- 15 MS Code §37-28-55 (2019)
- 16 MS Code §37-28-59(2) (1972
- Prothero, Arianna. (2018, August 9). Charter Schools. Education Week. Retrieved from http://www.edweek.org/ew/issues/charter-schools/? MS Code § 37-28-23(1) (2019)

\* Joint Legislature Committee on Performance Evaluation and expenditure Review (2002). A review of the Mississippi Adequate Eduction Program Funding Process. (PEER Publication #436). Retrieved from https://www.peer.ms.gov/reports/rpt436.pdf

- 19 MS Code §37-151-7 (1972
- 20 Joint Legislature Committee on Performance Evaluation and expenditure Review (2002). A review of the Mississippi Adequate Educa tion Program Funding Process. (PEER Publication #436). Retrieved from https://www.peer.ms.gov/reports/rpt436.pdf
- Putnam, Michael & Cabrera, Jill. (2015). Mississippi: One State's Search for Equity in School Finance. 10.1177/2158244015581187 Retrieved from https://www.researcheate.net/oublication/284712417 Mississippi One State's Search for Equity in School Finance/
- 22 Education Funding (2020). Retrieved from https://msparentscampaign.org/education-funding-2/

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# SCHOOL DISTRICT MAEP FUNDING FOR FISCAL YEAR 2021 THE SUCCESS<sup>24</sup>

The columns below show the amount of state Mississippi Adequate Education Program (MAEP) funding each school district has been allocated for the 2020-2021 school year compared to the amount each would have received if fully funded according to state law. The last two columns in red show each district's shortfall (the amount below what is required by state law) for FY2021 and cumulatively since FY2008, the last time the MAEP was fully funded. Also shown is each district's funding increase/decrease from FY2020 to FY2021.

School District	FY2021 Full Funding (amount required by law)	FY2021 Funding Per HB 1700 (ac- tual amount allocated)	Difference FY2020 to FY2021	FY2021 Amount Below Full Funding	Total MAEP Loss to Dis- trict FY2009- FY2021
Clarksdale	\$13,148,657	\$11,850,685	(\$339,396)	(\$1,297,972)	(\$18,708,538)
Clarksdale Collegiate Charter	\$1,991,909	\$1,795,277	\$410,948	(\$196,632)	(\$430,418)
Jackson Public	\$114,891,246	\$103,549,734	(\$8,146,928)	(\$11,341,512)	(\$155,781,686)
Ambition Prep Charter	\$1,276.326	\$1,150,334	\$347,800	(\$125,993)	(\$206,330)
Midtown Public Charter	\$1,385,574	1,248,797	\$2,790	(\$136,777)	(\$611,267)
Smilow Collegiate Charter	\$2,428,880	\$2,189,113	\$513,420	(\$239,767)	(\$531,624)
Smilow Prep Charter	\$3,121,717	\$2,813,556	\$42,561	(\$308,161)	(\$997,473)
Reimagine Prep Charter	\$3,131,118	\$2,822,029	\$2,822,,029	(\$309,089)	(\$1,221,562)

#### **BETTER SCHOOLS BETTER JOBS**

Efforts to advocate for full funding of MAEP had not been successful. After many years of frustration, an effort to mandate adequate funding was launched in 2013 with a ballot initiative called Better Schools Better Jobs.<sup>25</sup> The goal was to force the Legislature to fully fund MAEP by amending the state constitution. Language was placed on the 2015 statewide ballot to demand an adequate and efficient system. Republican leaders banded together to speak out against the initiative and proposed their own language. As a result, the measure failed by a small margin. <sup>26</sup>

#### **LEGAL CHALLENGE**

Many public education supporters were displeased with charter schools being able to receive state funding when traditional public schools had not been fully funded. Funding being allocated to charter schools meant that money would be pulled from public school districts that were already struggling. The Southern Poverty Law Center led the charge to address public funding of charters in a legal challenge against the state in 2016. If successful, this action could have dismantled charter schools. The basis of the lawsuit alleged that charter schools were in violation of the Mississippi Constitution by making school districts share property tax collections with schools that were not under their control.<sup>27</sup> Unlike traditional public schools, charter schools are operated by private, nonprofit groups. They receive tax money but

private boards separate from local districts and the Mississippi Department of Education.<sup>28</sup>

A Hinds County chancery judge ruled in 2018 that the method of paying for charter schools is acceptable. The Supreme Court affirmed the Hinds County Chancery Court's ruling holding that the plaintiffs failed to prove that the funding method is unconstitutional allowing charter schools to continue to receive state funding.<sup>29</sup>

#### STATE FUNDING ALLOCATION

Under MAEP, charter schools are funded like traditional public schools. They are issued a per-pupil amount equal to the state share for each student in the school district in which the charter school is located. The local contribution amount received is proportionate to that in the school district in which the charter school student resides.<sup>30</sup>

For charter schools enrolling students from outside of the district in which they reside, the state department of education pays the charter school an amount equal to the ad valorem tax receipts and in-lieu payments for the student's resident school district.<sup>31</sup> The funding process is clearly outlined for traditional districts to send the per pupil funding to charter schools but the legislature has yet to establish a mechanism for the return of the funding if the student returns to traditional public school prior to the end of the school year. This is a major oversight and is inherently unfair to traditional public schools.

#### CHARTER SCHOOL RESOURCES IN FY 2019 BY FUNDING SOURCES<sup>32</sup>

SOURCE OF FUNDS	MIDTOWN PUBLIC	REIMAGINE PREP	SMILOW PREP	SMILOW COLLEGIATE	CLARKS- DALE COL- LEGIATE	TOTAL
МАЕР	\$1,185,822	\$2,682,269	\$2,046,770	\$1,173,765	\$903,386	\$7,992,012
FY 2018 ADA Adjustment	\$78,114	(\$217,138)	(\$166,877)	\$0	\$0	(\$305,901)
Local Ad Valorem Taxes	\$777,091	\$1,652,218	\$1,218,372	\$649,568	\$287,704	\$4,594,953
Federal Funds	\$355,252	\$756,295	\$594,538	\$555,966	\$528,124	\$2,790,175
Other	\$136,481	\$155,750	\$99,005	\$352,322	\$831,335	\$1,574,893
Total	\$2,532,760	\$5,029,394	\$3,791,808	\$2,731,621	\$2,550,549	\$16,636,132

MS Code §37-28-7; MS Code §37-28-55



<sup>&</sup>lt;sup>24</sup> School District MAEP Funding FY 2021 (2020). Retrieved from https://tpcref.org/wp-content/uploads/PERDIST-

MAEP\_FY09-FY21.pd

<sup>&</sup>lt;sup>25</sup> Better Schools Better Jobs. Retrieved from https://ballotpedia.org/Better\_Schools\_Better\_Job

<sup>&</sup>lt;sup>28</sup>Quinn, M (2015, November 14). In School Funding Fight, Mississippi Voters Choose to Do Nothing. Retrieved from https://www.governing.com topics/education/gov-mississippi-school-funding-ballot.html

<sup>&</sup>lt;sup>27</sup> Araujo vs. Bryant, 2018-CA-00235-SCT<sup>21</sup> Joint Legislature Committee on Performance Evaluation and expenditure Review (2002). A review of the Mississippi Adequate Education Program Funding Process. (PEER Publication #436). Retrieved from https://www.peer.ms.gov/reports/rpt436.pdf

<sup>&</sup>lt;sup>29</sup> Araujo vs. Bryant, 2018-CA-00235-SCT

<sup>&</sup>lt;sup>30</sup> MS Code § 37-28-55(2) (2019

<sup>31</sup> MS Code § 37-28-55(1) (2)

<sup>&</sup>lt;sup>22</sup> Joint Legislative Committee on Performance Evaluation and Expenditure Review (2019), FY 2019 Annual Rep Analysis of Funding for Mississippi Charter Schools and the Charter School Authorizer Board. (PEER Publication #637), Retrieved from https://www.peer.ms.gov/Reports/reports/rp1637.

### FY 2019 LOCAL CONTRIBUTIONS TO AND NUMBER\* OF STUDENTS IN EACH CHARTER SCHOOL, BY STUDENTS' DISTRICTS OF RESIDENCE

School District	Midtown Public	Reimagine Prep	Smilow Prep	Smilow Collegiate	Clarksdale Collegiate	Total
HINDS COUNTY SCHOOL DISTRICT \$3,852.47 PER PUPIL	\$3,852.47 per pupil	\$23,114.82 (6 students)	\$77,049.40 (20 students)	\$23,114.82 (6 students)	\$15,409.88 (4 students)	\$138,688.92 (36 students)
JACKSON PUBLIC SCHOOL \$2,922,39	\$753,976.62 (258 stu- dents)	\$1,575,168.21 (539 students)		\$634,158.63 (217 stu- dents)		\$4,158,560.97 (1,423 stu- dents)
PER PUPIL  CLARKSDALE SCHOOL DIS-					\$149,186.12 (109 students)	\$149,186.12 (109 students)
TRICT \$1,368.68 -PER PUPIL						
CLEVELAND SCHOOL DIS- TRICT \$2,957.65 PER PUPIL					\$2,957.65 (1 student)	\$2,957.65 (1 student)
COAHOMA COUNTY SCHOOL DIS- TRICT \$3,997.37 PER PUPIL					\$115,923.73 (29 students)	\$115,923.73 (29 students)
NORTH BOLI- VAR SCHOOL DISTRICT \$1,444.58 PER PUPIL					\$2,889.16 (2 students)	\$2,889.16 (2 students)
WEST TALLA- HATCHIE SD \$3,349.38					\$16,746.90 (5 students)	\$16,746.90 (5 students)
PER PUPIL  TOTAL	\$777,091.44 (264 stu- dents)		\$1,218,372.33 (415 students)	3 \$649,568,51 (221 stu- dents)	\$287,703.56 (146 students)	\$4,584,953.45 (1,605 stu- dents)

<sup>&</sup>lt;sup>33</sup> Joint Legislative Committee on Performance Evaluation and Expenditure Review (2019). FY 2019 Annual Repc Analysis of Funding for Mississippi Charter Schools and the Charter School Authorizer Board. (PEER Publication)



#### FINANCIAL IMPACT OF CHARTER SCHOOL GROWTH

School funding is based on student attendance. When a student moves from a traditional public school to a charter school, their pro-rated share of school funding follows them to the new school.<sup>34</sup> The loss of funding to traditional public schools is compounded by the fact that often times they cannot make adjustments to offset the lost revenue of pupil transfers to charters. In districts with multiple schools, charter students are generally drawn from various schools within the district. The impact of this is that the actual number of students transferring to a charter school may be insufficient in one school to trigger significant cost reductions.<sup>35</sup> This creates issues because fixed cost like personnel, utilities, debt, etc., are not able to be reduced despite having less money. Unless the disenrollment is so significant to force school closures, the expense of heating and cooling schools, running cafeterias, maintaining digital and wireless technologies, and paving parking lots—all of this is unchanged by modest declines in enrollment.<sup>36</sup> Additionally, districts have significant administrative responsibilities that cannot be cut in response to falling enrollment. Responsibilities like planning bus routes and operating transportation systems; developing and auditing budgets; managing teacher training and employee benefits; applying for grants and certifying compliance with federal and state regulations; and the everyday work of principals, librarians, and guidance counselors.<sup>37</sup>

The payments from traditional public schools to charters impacts their bottom line. Jackson Public Schools has notated an increase in charter school payments for the 2020-21 school year. It is estimated to be a total of \$7,000,000.00, representing an increase of approximately \$1,486,000.00 over the current year.<sup>38</sup>

#### **LICENSURE**

Mississippi has two standards for teacher licensure. One standard for traditional public schools and another for charter schools. Up to 25% of teachers in a charter school may be exempt from licensure and administrators are not required to be licensed. All teachers must have demonstrated subject-matter competency, and teachers and administrators must have at least a bachelor's degree. Within 3 years of initial application, all teachers must have at least an alternative license. For traditional public schools, 5% are working outside of their endorsement. This standard cannot include anyone in the academic core courses. This results in all teachers needing to be certified or accreditation is impacted. In the control of the control of

#### **ACADEMIC PERFORMANCE**

The academic success of charter schools has long been debated. A new report the U.S. Department of Education's National Center for Educational Statistics (NCES) released "finds that charter school and public school students have the same academic performance in testing conducted at the fourth- and eighth-grade level.<sup>41</sup>

#### **ACADEMIC PERFORMANCE RESULTS, FY 16- FY19** 42

CHARTER SCHOOL	F 1 10		FY18	FY19	
Midtown Public	F	F	F	D	
Reimagine Prep	D	D	С	В	
Smilow Prep	NOT OPERATING	D	D	С	
Clarksdale Collegiate	NOT OPERATING	NOT OPERATING	NOT OPERATING	NO GRADE	

<sup>34</sup> MS Code § 37-28-55 (2019)

- <sup>35</sup> G. Lafer (2018, May) Breaking Point: The Cost of Charte Schools on Public School District. Retrieved from http://www inthepublicinterest.org/wp-content/uploads/ITPI\_Breaking Point\_May2018FINAL.pdf
- 36 G. Lafer (2018, May) b
- <sup>37</sup> G. Lafer (2018, May) c
- 38 JPS Budget Hearing June, 2020
- <sup>39</sup> MS Code §37-28-47 (2019)
- MS Code §37
- 41 J. Heling (2019,September 19) School Choice int the U.S. Retrieved from https://www.newsweek.com/charter-schoolsvs-public-schools-funding-test-scores-performance-1461659
- <sup>43</sup> J. Joint Legislative Committee on Performance Evaluation and Expenditure Review (2019), FY 2019 Annual Report: Analysis of Funding for Mississippi Charter Schools and the Charter School Authorizer Board. (PEER Publication #637). Retrieved from https://www.peer.ms.gov/Reports/retoots/re

#### **COMMUNITY CONCERNS**

One of the biggest concerns with charter schools is that they are often difficult to hold accountable. With decisions being made by private organizations rather than a local board and overseen by an appointed body, questions regarding transparency and accountability are often raised. Technically, charter schools can be shut down for failing to meet the terms established in their charter, but in reality, this often proves difficult to enforce. Charter schools often face financial hardships and usually close for this reason in communities across the nation.43

The lottery system that many charter schools have used has also come under scrutiny. The prevailing argument by opponents is that the lottery system is not fair to students wishing to gain access who are not selected. Charter schools have authority to select students as long as they reflect the composition of the district.<sup>44</sup> For example, special needs students are not as likely to attend a charter school as a traditional public school.45

The final concern is that teachers at charter schools often "burn out" due to the longer hours and higher levels of stress. Continuity from year to year at a charter school is often lacking because there is often high staff turnover across teachers and administrators. 46

#### **CONCLUSION AND RECOMMENDATION**

The growth of charter schools in Mississippi is having an impact on traditional public schools. Public opinions remain split regarding the quality of education and state support for the schools. The amount of money and resources being funneled into charter schools could be supporting the budgets of traditional public schools to secure student success. Charter schools are educating a smaller number of students, that have primarily been hand selected with similar outcomes to traditional public schools. Despite all of the data presented and outcomes initially stated, charter schools have not had the academic success touted by its supporters.

Based on the community concerns above, we recommend the following:

- Eliminate the charter school system in our state and focus all resources and talent on providing a high-quality public-school
- Mississippi State Legislature should fully fund MAEP making it possible for school districts throughout the state to provide a high-quality public-school education for Mississippi's children.
- Mississippi State Legislature should amend the state constitution to require high-quality public-school education for every child in the state making it mandatory that the legislature continue to fully fund MAEP
- MDE should reexamine its evaluation and accountability practices to reflect a fair and just system. A system that considers the socioeconomics surrounding school districts especially in low - wealth areas.
- Mississippi State Legislature should increase teacher pay to be competitive with bordering states thus keeping our talent in our state.



d Gordon, L (2018, May 28). Breaking Point: The Cost of Charter Schools for Public School Districts. Retrieved from https://www.inthepublicinterest.org/report-the-cost-of-charter-schools-for-while-cha

<sup>44</sup> MS Code

<sup>45</sup> Meador (2018, April). What are the Pros and Cons of Charter Schools? Retrieved from https://www.thoughtco.com/what-are-the-pros-and-cons-of-a-charter-school-3194629

<sup>46</sup> Meador (2018, April). What are the Pros and Cons of Charter Schools? Retrieved from https://www.thoughtco.com/what-are-the-pros-and-cons-of-a-charter-school-3194629