

Common enrollment systems designed to manage student enrollment across district and charter sectors introduce a host of governance challenges. City charter and district leaders realize the importance of cross-sector representation when deciding policies related to enrollment, such as the number of choices families should list or whether some students will have enrollment priority over others. The question of who will administer the enrollment process once these policy decisions are made can be highly controversial. Cities that don't attend to these management questions early on risk major political fights that can stall or derail progress on the effort.

There is little precedence, nor is there a ready-made legal framework, for coordinating enrollment across sectors; how these systems will be governed and operated must instead be resolved through the collaboration of agencies, many of which have histories of competition, mistrust, and hostility. In this issue brief, we draw from a series of interviews with local education leaders in Denver, New Orleans, and Washington, D.C., focusing on the governance issues that emerged as these three jurisdictions sought a cross-sector common enrollment system.

While some urban school systems have long had enrollment processes to manage choice for schools under their control, the expansion of charter schools presents a different and more complicated challenge for both parents and administrators. In many places, students no longer have a single "home district" in the traditional sense. Instead, they can now choose to enroll in the local school district or one of the city's charter schools. State charter laws give charter schools—whether they are an independent local education agency or not—authority over their enrollment processes; a charter school must conduct its process in a manner consistent with the law, typically a random lottery.

As charter schools grow in number, so does the number of separate enrollment systems operating across individual cities. In Denver, for example, a 2010 report showed that 60 separate enrollment systems operated in the city *at the same time*.<sup>1</sup> Similar situations occurred in New Orleans and D.C. As individual selection processes grew to unmanageable levels in these cities, education and community leaders sought ways to rationalize and centralize student placement across an increasing number of school choices.

## THREE CITIES BREAK GROUND ON COMMON ENROLLMENT SYSTEMS

In 2012, Denver Public Schools (DPS), which authorizes all charter schools in the city, launched a common enrollment system called SchoolChoice, for all local district and charter schools. Charter schools voluntarily participate in SchoolChoice, which is operated by the district's central office.

In 2012, the Recovery School District (RSD) in New Orleans launched OneApp to manage the enrollment of all of the schools under the RSD's oversight, including a small number of district-run schools and 49 of the city's charter schools. In 2013, a set of schools outside of the RSD—schools run directly by the Orleans Parish School Board—joined OneApp as well. In addition, the state-authorized charter schools joined OneApp for the 2014 enrollment class.

The office of the D.C. deputy mayor for education partnered with the D.C. Public Charter School Board, D.C. Public Schools (DCPS), and individual charter schools and networks to launch a common enrollment system in 2014. The school district now requires students who want to enroll outside of their neighborhood attendance zone to apply through the new system. In addition, 90 percent of the city's charter school seats will be assigned through the new system.

Denver, New Orleans, and D.C. currently operate multi-sector common enrollment systems.<sup>2</sup> Each of these cities engaged a wide range of charter, district, community, and city leaders to design their enrollment systems, but each took a slightly different approach to governance. In Denver, the system found a permanent home in the district central office. In D.C., the deputy mayor's office will house the enrollment system in the first year, but it may or may not do so in the future. Currently, the RSD operates OneApp in New Orleans, but the RSD's role there is expected to sunset. This impermanence helped leaders in D.C. and New Orleans win support for common enrollment in part by delaying potentially contentious decisions regarding the "ownership" of the system, though these questions will eventually have to be resolved.

1. Institute for Innovation in Public School Choice, *An Assessment of Enrollment and Choice in Denver Public Schools* (New York City: Institute for Innovation in Public School Choice, May 2010).

2. In the spring of 2014 the Newark Public Schools District encouraged the city's charter schools to participate in the district's enrollment process. Most charter schools in the city voluntarily participate, making Newark a fourth city with substantial cross-sector enrollment.

## WHAT NEEDS TO BE GOVERNED?

Cities adopting common enrollment engage in a lengthy design process that establishes the rules all schools and families must observe when enrolling students. System designers must make many important decisions, such as what the timeline will be for applications and offers, and what information to require on applications. District and charter sector leaders may also decide to consider more contentious policy questions, including whether students will receive preference based on neighborhood, family income, or special needs, and where students entering the system midyear can be placed.

Denver, New Orleans, and D.C. convened a broad spectrum of community representatives and stakeholders from the charter and district sectors to build the foundational rules for the system. Leaders embarking on common enrollment are very deliberate in who they engage and how they do it. (See our [issue brief](#) on engaging stakeholders in the design and implementation of common enrollment systems.)

The agency that implements the system—which may or may not include this initial design team—will negotiate and resolve any ongoing policy or process design questions. It will also be accountable for maintaining an efficient and reliable enrollment process.

Once the basic design of the common enrollment system is in place, the main activities that require ongoing governance include:

- Modifications of the matching and enrollment rules
- Annual maintenance and operation of the match software
- Central management of midyear placements and transfers
- Advertising, marketing, and, in some cases, parent information initiatives

When the initial policies are agreed on, modifications to the enrollment process, at least in the short run, are common. Both Denver and New Orleans made multiple changes to their common enrollment systems in response to feedback from the community and other stakeholders. For example, Denver and New Orleans developed an online application after previously offering only a paper application. New Orleans added a “family link,” allowing families to move all of their children to a school together, and revamped its midyear transfer and enrollment process to address the uneven impact of midyear transfers across schools.

Even small modifications can seem significant and have implications for student placement. City leaders need to be clear about how such changes will be handled and by whom. Denver and New Orleans continued to engage their original working

group members to resolve ongoing issues or changes to the application or placement process. In addition, they reached out to families via focus groups and surveys to learn about their experiences with the new enrollment system.

Keeping the original working groups engaged in modifications, rather than convening new groups, offered three important benefits. First, the working group members had already demonstrated that they could arrive at decisions even amid disagreement. Second, the groups were steeped in the nuances of the problems at hand, having spent the better part of a year working through the first iteration of the system. They knew the history of the initial design decisions and the debates that led to them. Third, the working groups reflected an array of stakeholders with considerable investment in the new enrollment system.

The day-to-day implementation work is the ongoing operation of the enrollment system software, placement processes, midyear transfers, and marketing and community engagement. This work is managed by some agency (the district or some other organization) that acts on behalf of and in accordance with the policies as designed by the working group. An office in the district central office performs these functions in Denver. For now, an office at the RSD performs these functions in New Orleans. For the first year of implementation in D.C., a team under the deputy mayor for education will manage these functions, possibly with the support of an outside contractor.

## MISTRUST BETWEEN SECTORS MAKES GOVERNANCE A CHALLENGE

Enrollment as the basis for funding is the lifeblood of schools. Small charter schools can feel the pain of just one empty seat. Districts with shrinking budgets cannot afford to lose students who want to be in their schools. This bid for students places charter and district schools in competition, even as they all aim for the same goal of quality education for students. This competition—and the anxiety that can accompany it—leads to two main concerns: the capacity of the district, or any other organization, to successfully implement common enrollment, and whether it can be trusted to do so.

### Can you really pull this off?

Adequate capacity to smoothly implement student matches loomed large in the discussions leading up to the implementation of common enrollment in both Denver and New Orleans. Charter schools, which had invested in honing their recruitment and lottery methods, expressed considerable skepticism as to whether the central office in Denver and the RSD in New Orleans could competently perform the match.

In each city, charter leaders recounted bureaucratic failures from their respective districts, triggering anxiety at the prospect of turning over their enrollment lotteries to these particular organizations.

At the same time, it is fair to ask what agency, if not the district, has the organizational capacity and experience to perform large-scale transactions? The enrollment system requires the management of a large amount of data, communication to and from tens of thousands of families, a customer service operation to resolve questions from families and schools, and a marketing effort to inform the community of processes, timelines, and the importance of engaging in choice.

### **Can we trust that this is aboveboard?**

Many charter leaders, reacting to a tense history between districts and charter schools, expressed low trust in local districts. In some cases charter leaders worried that the district would use the enrollment process to rig the results in favor of district schools or the schools that the district needed to fill. Others felt that common enrollment was one more effort to constrain charter schools' autonomy. This lack of trust surfaced even in Denver, where the district's efforts to support and start new charter schools give outsiders an impression of a positive relationship between charter schools and the district.

In D.C., where charter schools and the district have a tumultuous history, leaders from the Mayor's office and the D.C. Public Charter School Board who saw value in common enrollment realized that they needed to work with charter schools on their enrollment processes and gain their trust before embarking on an initiative that also included DCPS. Even then, these leaders spearheading the common enrollment effort did not propose that either DCPS or the D.C. Public Charter School Board operate the enrollment application and matching process.

Charter and district leaders in all three cities wanted assurances that the process would be transparent and that they could confirm for themselves that the work was performed as outlined by the policies and rules of the system.

Parents also worry about the integrity of the governance agency. While this did not come up in the three cities profiled here, parents interviewed in another city seeking to pursue common enrollment expressed considerable concern that anyone could objectively administer a common enrollment system. This concern may seem outsized to school and district administrators who, by and large, conduct their current enrollment processes with integrity. Nonetheless, it does reflect how important the outcomes of enrollment processes are to parents and how much anxiety changing to a new system raises, even if they aren't satisfied with the current system either.

The twin concerns about capacity and trust raised a conundrum in both Denver and New Orleans. In both cases, the districts had more capacity than other public or nonprofit agencies to administer the system, but they were also the least trusted by the charter sector to do so competently and fairly. The team leading the effort for common enrollment in D.C. never viewed DCPS as a viable option because DCPS does not authorize the charter schools. Instead, leaders are exploring alternate arrangements that would share operational and oversight responsibility across the sectors.

### **Is collaborative enrollment governance possible?**

There are grounds for mutual best interest across the competing school sectors. First, across the three cities profiled in this brief, district and charter operators recognized how difficult the prior processes were for families.

Second, charter and district leaders had to deal with a great amount of uncertainty generated by rolling timelines and multiple offers across all the different systems. Students usually enrolled in the first school to accept them, only to opt out when a better offer came in. This move set off a cascade of waitlist notifications and enrollment changes that often continued well into the start of the school year, leaving schools unable to properly forecast revenue or staffing needs.

Finally, some schools saw others skirting the rules on fair lotteries, creating a thriving gray market for enrollment that penalizes actors who played by the rules.

### **MODELS FOR GOVERNING AND OPERATING COMMON ENROLLMENT**

At present there are two ways to govern cross-sector enrollment that address the concerns about capacity and trust: either by housing the system inside the local school district central office or in a trusted agency outside the district.

#### **Managing common enrollment from inside the district**

Operating a common enrollment system inside the district, as with Denver's SchoolChoice system, takes advantage of the district's existing organizational capacity and the fact that in most cities districts are the most recognized face of public education. School districts do, however, face a challenge in winning the confidence of charter schools.

The Office of Choice and Enrollment Services at DPS performs all of the operational tasks required of common enrollment and coordinates system evaluation and any ongoing system design changes. The office includes a director; permanent staff, who perform analyses of enrollment data and provide parent outreach; and temporary

staff, who process the applications after the enrollment deadline. The system is financed by the district, which receives public revenue for its schools, and by authorizer fees for the charter schools it authorizes. The district also subsidized the design, launch, and some information activities with private philanthropic support.

Although the office is under the purview of the district superintendent, system design decisions (including modifications after the initial launch) have always been examined by a broad spectrum of constituents, including representatives from charter and district schools. This constituency continues as the “SchoolChoice Transparency Committee,” which is hosted by A+ Denver, an external nonprofit organization. This committee does not have statutory authority and is not written into formal district policy but is considered to be the core body advising on any system design decisions. The committee’s members are selected by A+ Denver and include school leaders from charter, magnet, and traditional schools; school district leaders; city leaders; and other stakeholders, including a parent.

Although the district is the sole authorizer of charter schools in the city and could have used this authority to require participation in common enrollment, they chose not to do that. Instead, charter schools participate voluntarily and can withdraw if they feel the district is improperly administering enrollment—which adds a layer of accountability to the system.

The responsiveness, inclusiveness, and competence of district leadership, particularly from the director of the Office of Choice and Enrollment Services, as well as the neutral ground for design conversations, inspired the confidence of skeptical district and charter leaders concerned about both the capacity and trustworthiness of a district-run centralized system.

### **Taking common enrollment outside the district**

Given the lack of trust and no legal arrangement linking the district and charters, many consider the possibility of a third-party operating the common enrollment system. Variants of this model include turning to an existing nonprofit organization in the city; a government organization like the mayor’s office, city council, or the state department of education; or a new nonprofit created for this purpose. Existing organizations offer ready capacity, but they also come with a track record that may not be acceptable to all parties. New organizations can be formed collaboratively to mitigate trust gaps, but all of the organizational infrastructure and capacity must be built at the same time a new, high-profile, and highly consequential enrollment system is rolling out.

Of the three cities profiled here, only D.C. opted to launch and operate the new enrollment system outside the local school district. D.C.’s deputy mayor for

education, who had experience working for the district and serving on a charter board, convened a diverse constituency to design the first iteration of the system. The initial launch, which is still underway, is overseen by an executive team chaired by the deputy mayor and includes three district representatives and three charter representatives. Any decision requires support from both sectors. Long-term governance is yet to be resolved.

The oversight requirements of an external agency will differ between governmental organizations and nonprofits. In a governmental organization, an elected or appointed official, such as the mayor or state education chief, is ultimately accountable for the operation of the enrollment system.

A new nonprofit, however, will require an oversight board, bylaws outlining the constitution of this board, and processes for seating members on the board and determining how decisions will be made by the organization. For political viability the board will likely need to represent all relevant stakeholders, including district leaders, charter leaders, and parents.

Financing an externally operated enrollment system requires contributions from system participants: either schools or the agencies that authorize the schools.

A benefit of an external agency is that it could be set up to address all inter-sector concerns. In addition to administering common enrollment, this agency could manage facility-sharing agreements and advise on new school placement.

### **TRANSITIONING TO A LONG-TERM HOST**

The long-term governance of common enrollment can be a paralyzing concern, especially before the new system has had the chance to prove its value to schools and families. A way to move the work forward is to launch the system in an organization that is best equipped to take on the work and has (or can gain through agreements) enough trust from school operators to temporarily accept the arrangement pending an evaluation of outcomes. This approach is designed to deal with the vexing problem raised earlier: that the district, which is often the most prepared to perform the operations for common enrollment, is the least trusted agency among charter schools.

The benefit of the transition model is that the tremendous effort of launching a new enrollment system is situated near or in the organization and staff that has the experience performing such a transaction-intensive task, but district and charter partners do not need to fully overcome their skepticism and mistrust to move forward.

In the transition model, the trust gaps can be mitigated in the short term with a well-crafted memorandum of understanding (MOU). This would specify the host organization's responsibility for implementing the enrollment system and its role in any modifications that seem necessary. The MOU would also appoint an advisory team to conduct an independent evaluation of the system outcomes. Based on this evaluation, the team would offer a thorough recommendation and plan for the long-term governance of the system. Again, keeping school and district participation voluntary creates accountability pressure on the host organization.

In essence, both D.C. and New Orleans took this approach. The RSD in New Orleans is not expected to be a permanent agency. OneApp will be placed in a new host organization as schools improve and the RSD transitions out. The Orleans Parish School Board or an independent nonprofit are the leading candidates to take over the system. The D.C. deputy mayor for education's office, unlike the RSD, is not a temporary agency, but the leaders designing this system chose not to address the question of long-term governance, instead focusing on system design and launch. They plan to develop a long-term governance solution once the system proves its utility to schools and families. A proof of concept will likely ease the governance conversations because anxiety about the system's impact on schools will be understood and participants are likely to perceive less risk no matter which organization hosts the system.

## SUMMARY

In a growing number of cities where families face a diverse and sometimes confusing set of school choice options, a few pioneering community and education leaders are turning to common enrollment systems in hopes of reducing both the complexity and uncertainty associated with an increasingly fragmented and complicated educational landscape. Common enrollment systems raise challenging questions about who has the responsibility for implementation, and how the system can adapt and change over time. These questions are made all the more challenging when schools in different sectors are competing for students and when cross-sector trust is low. The experiences of cities that have embarked on common enrollment suggest that there is no single best way to meet these challenges, and that resolving these issues once and for all is not a prerequisite for moving forward.

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