STRENGTHENING FEDERAL INVESTMENT IN CHARTER SCHOOL FACILITIES

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EXECUTIVE SUMMARY

Charter schools today serve more than 3 million students. Nationally, these students account for approximately 6 percent of all K-12 enrollment, though the percentage is much higher in many communities. Research shows that charter schools on average have a positive impact on student outcomes,[1] and survey data suggest that there are an additional 2.5 million students whose parents would enroll them in a charter school if location and capacity were not an issue.[2]

Still, access to facilities is and will continue to be a challenge to the growth of the sector. Public charter schools do not have access to the same financing structures as district schools and, as a result, charter schools are often forced to resort to operating in subpar facilities (like church basements or abandoned storefronts) that lack important amenities (like gymnasiums, libraries, and science labs) or not open at all. A series of stopgap philanthropic and government solutions have helped charter schools access facilities. However, these solutions are limited in both their reach and funding, and do not come close to meeting the charter sector's facilities needs.

Given both the increasing demand for charter schools and the academic growth that many charter schools accomplish for high-need youth, it is imperative to improve charter schools' access to facilities.

Education is primarily a state responsibility, but the size and importance of the charter school facilities challenge merits the attention of federal policymakers. Federal dollars have historically been a catalyst for charter school growth and innovation, federal policymakers are uniquely positioned to ensure the equitable treatment of all public school children, and federal policy can help provide comprehensive and long-term solutions to help all students attend school in a high-quality and safe facility. Moreover, the federal government has an interest in charters' ability to better reach underserved young people. Federal policymakers may take up the issue of infrastructure in the near future, where they can create and amend programs that will meaningfully improve charter schools' access to facilities.

The purpose of this paper is to examine what can be done at the federal level to provide additional resources to charter schools to access school buildings, and to create incentives for states to address inequities in the allocation and funding of buildings. The ideas presented here are the result of a one-day convening of more than 30 charter school facility policy experts, finance experts, practitioners, and nonprofit lenders. They include changes that policymakers can make to strengthen existing programs as well as new programs that policymakers can create to ease the facilities burden on charter schools.

The proposals offered in this paper are summarized in the tables on the following two pages. Collectively, the suggestions we offer will broaden the reach of federal investments and help equalize access to facilities for charter schools. This will ensure that new schools can launch and existing, high-performing schools can expand to meet current and future demand.

POLICYMAKERS SHOULD CHANGE EXISTING PROGRAMS TO BETTER MEET CHARTER SCHOOLS' FACILITIES NEEDS

PROGRAM NAME	SUMMARY OF CHANGES	BENEFITS OF CHANGES
Credit Enhancement for Charter School Facilities	• Review and analyze data about what kinds of charter schools participate in and benefit from the program, better identify gaps, and help policymakers ensure all types of schools are able to benefit from the program. • Incentivize lenders to take more risk in order to ensure that new, innovative, and geographically diverse school models can take advantage of the program. • Continue to increase funding for the program.	This program is currently working quite well, and these changes will enable even more schools to take advantage of it.
Community Facilities Direct Loan & Grant Program	• Align definitions of "rural" across agencies to increase clarity. • Broaden eligibility requirements to include small towns that face similar challenges to rural communities. • Encourage local agencies to prioritize charter facilities in their applications. • Modify the feasibility study component of the application process to accelerate the approval timeline.	These changes will make the program available to a larger number of schools.
State Facilities Incentive Grant	• Make funds available on an annual basis so states become eligible and receive funding immediately after passing eligible legislation. • Expand the types of state programs that could benefit from this funding.	These changes will make the program more attractive to states and ensure that states implement a variety of programs and policies to support charter schools' access to facilities.

POLICYMAKERS SHOULD CREATE NEW PROGRAMS AND POLICIES TO FILL GAPS BETWEEN CURRENT PROGRAMS

<table>
<tr><th>PROPOSED PROGRAM</th><th>SUMMARY OF PROGRAM/POLICY</th><th>BENEFITS OF PROGRAM/POLICY</th></tr>
<tr><td>Charter School Infrastructure Tax Credit Program</td><td>This program would sell charter school infrastructure bonds and notes to investors in the capital markets in the same manner that other bonds and notes are sold. Investors would receive federal tax credits for the purchase of these notes, which would supplant the school's interest payments.</td><td>This program would improve charter schools' access to the long-term capital they need to obtain and operate in high-quality facilities.

It would be tailored to address the specific needs of charter schools, which is more efficient than trying to create a charter school carve-out in existing programs.</td></tr>
<tr><td>Equitable School Facilities Investment Program</td><td>This program would provide targeted support to charter schools that are typically viewed as higher risk by traditional lenders, such as those run by independent operators rather than charter management organizations (CMOs), those in their first few years of operation, or those with new or innovative models.
It could offer a variety of funding options to eligible startup and independent charter schools, including:
Direct loans at low interest rates to help charter schools finance a facility;
Grants to help schools fund various stages of the work, for example to enable a school to hire an expert consultant during the pre-development phase; and
Loan guaranties to private lenders who make loans to certain charter schools viewed as a higher risk.
An alternative structure for this program could provide grants to intermediaries, like community development financial institutions (CDFIs), either as a completely separate program or as a supplementary set-aside to the credit enhancement program. The program could couple these grants with a CDFI capacity-building grant to ensure more charter schools have access to a CDFI and thus, this program.</td><td>This program would provide targeted support to charter schools that typically have a much more difficult time accessing facilities financing through existing channels. By doing so, it will help ensure that the charter school sector remains diverse in geography and in the types of schools that are able to open.</td></tr>
<tr><td>Incentivize State Action</td><td>Federal policymakers could use new funding to incentivize state action. For example, federal policymakers could require states to set aside a proportion of infrastructure funding equal to the proportion of students enrolled in charter schools in a particular state or community, or it could set a representative proportion aside at the national level to be allocated to charter schools. Policymakers could also condition funding or create incentives to encourage the equitable treatment of charter schools in state policies or use new funding to incentivize states to adopt a broader range of charter facility policies.</td><td>This policy ensures that decisions over facilities programs and policies remain at states' discretion, while providing federal funds to encourage states to adopt those that support charter schools.</td></tr>
</table>

INTRODUCTION

Today, nearly 7,000 charter schools nationwide educate more than 3 million students—6 percent of the country's total K-12 public school enrollment.[3] Survey data suggest that the parents of an additional 2.5 million students would enroll them in a charter school if location and capacity were not an issue.[4] And research shows that charter schools have been able to accelerate learning for disadvantaged students.[5]

Despite the demand for additional charter schools and their promising track record of improving student outcomes, they continue to face numerous barriers to growth. One of the most significant is limited access to school facilities. Charter schools have always struggled to find and fund facilities in which to operate their educational programs and must often compete in the commercial real estate markets where they operate.

District schools usually have a monopoly on publicly owned school facilities and do not face this challenge. They typically own or control their facilities, and they can issue tax-exempt bonds to support new constructions and renovations. Districts then pay these bonds with taxpayer funds out of their capital budgets, independent from the operating budgets of the schools. Charter schools, on the other hand, typically do not receive funding that is sufficient to cover more than their operating costs and must pay for facilities costs out of their operating budgets.[6]

This deficiency in the public infrastructure for education is having a significant impact on whether parents have high-quality options for their children.

Inequitable access to school facilities has significant implications for the charter school movement and its students:

a) The expansion of charter schools is unable to keep pace with the demand from families;

b) A student who attends a charter school receives less public support for his education, compared to a student who attends a district school;

c) Charter schools must divert significant funding from teaching and learning to pay for basic infrastructure and capital costs; and

d) Charter schools often operate in suboptimal facilities that lack common and important amenities like gymnasiums, libraries, or science labs.[7]

As the charter sector has grown, a series of philanthropic and government solutions to the facilities challenge have emerged, but they are far from comprehensive. In the philanthropic sector, some foundations that invest in public education provide some charter schools with grants for planning and design expenses and low-interest loans for construction costs. In the public sector, some state-level programs support charter schools' access to facilities. For example, 22 states require school districts to provide charter schools the right of first refusal on unused or underused district facilities.[8] Nine include charter schools in district capital planning and bonds.[9] The federal government—specifically the U.S. Departments of Agriculture, Education, and Treasury—also administers several different programs, most of which are designed to reduce the borrowing costs for schools and other institutions and encourage private-sector investment.

These philanthropic and government solutions don't come close to meeting the estimated $375 million in additional funding needed annually to meet the facility needs resulting from the sector's growth. (See *Figure 1* for calculation of estimated need.) Given the magnitude of the challenge and its role in restricting educational opportunity for students, the federal government is well positioned to implement meaningful policy solutions.

In the fall of 2017, a group of more than 30 charter school facility policy experts, finance experts, practitioners, and nonprofit lenders gathered in Washington, D.C. to surface potential policy solutions (see the Appendix for a list of participants). This paper summarizes the insights generated at the meeting. We begin by providing a summary of current federal programs that help charter schools access facilities, and describe some of the barriers that different types of charter schools face in accessing these programs. We then describe changes that could be made to strengthen these existing programs, and conclude by describing some new policy solutions that we believe will help policymakers fill gaps in the existing patchwork of solutions.

The policy solutions described here are based on the beliefs that all children should have equitable educational opportunity, regardless of whether they attend a district or charter public school, and that the size and scope of the challenge merits an active role for the federal government.

FIGURE 1: ESTIMATING THE SIZE OF THE CHARTER FACILITY CHALLENGE

There is not a simple calculation for determining the magnitude of the annual need for charter school facilities, or the amount that charter schools could redirect to instruction if policymakers implement strong public policies. Much of the data needed for a truly rigorous calculation are unavailable. However, estimates can provide a rough sense of the challenge:

The overall value of the facilities in which charter schools are currently operating, regardless of whether the schools own or lease those facilities, is approximately $45 billion. This number is increasing by about $375 million each year as new schools open.

- **Total value of facilities currently used by charter schools:** Multiply the average value of charter school properties by the number of current properties [7,000 properties[10] * $6.4 million / property[11] = $45 billion in real estate assets sector-wide]

- **Annual value of new facility needs:** To estimate the amount of real estate assets needed each year as small schools expand and new schools open, multiply the number of new students enrolling in charter schools each year by the average facilities expense per student [200,000 new students annually[12] * $12,500/student[13] * 15% for facility expenses[14] = $375 million in annual need]

If the charter sector had to pay debt service on the total ($45 billion) value of all real estate currently in use, the charter sector collectively would spend an estimated $3.6 billion to $5.6 billion on facilities each year.

- **Estimate based on annual debt service costs:** Multiply the total value of charter school properties by annual debt service and operating costs [$45 billion in real estate assets * (6% in annual interest payments + 2% in operating costs) = $3.6 billion in annual facility-related payments]

- **Estimate based on average annual cost per student:** Multiply the current number of charter students by the average annual cost per student [3 million students * $12,500 per pupil revenue * 15% for facility expenses = $5.6 billion annually in real estate costs across the sector]

If the charter sector had to pay interest on the total ($45 billion) value of all real estate currently in use, charter schools would spend an estimated $1.4 billion more each year on facilities expenses than they would if they had access to districts' interest rates.

- **Estimate based on differences in charter vs. district interest rates:** Calculate the difference in borrowing costs by multiplying the value of all assets by the difference in interest rates [$45 billion in real estate assets * (6% for charters or 3% for districts) = $1.4 billion more in interest payments to banks]

These are only approximations, but they nonetheless make clear that the charter school sector faces a multibillion-dollar challenge in facilities. **Saving even 1 percent of these funds each year could realize tens of millions of dollars in savings for charter schools, which charter schools can then reinvest in their academic programs and use to expand their impact on students, families, and communities.**

EXISTING FEDERAL PROGRAMS

The following federal programs have helped charter schools finance facilities, each with strengths and weaknesses as summarized below. While each program can provide piecemeal solutions to some charter schools, there remains a significant gap in how public policy addresses the charter facility challenge.

PROGRAM (DEPARTMENT)	OVERVIEW	FY 2017 FUNDING	STRENGTHS	CHALLENGES
Community Facilities Direct Loan & Grant Program (Agriculture)	This program provides loans, guaranties, and grants to public entities and nonprofit organizations that are building "essential community facilities" — including but not limited to charter schools — in rural areas of up to 20,000 in population. Funds may be used for the construction, renovation, or improvement of facilities.	$2.2 billion[15] (Total funding for direct loans) $25 million (Total funding for grants)	Reduces interest rates	Restricted to very few recipients Restricted to specific uses
Credit Enhancement (Education)	This program grants funds on a competitive basis to public and nonprofit entities. Program funds can be used to attract funding — such as to guarantee and insure debt or guarantee and insure leases—to help charter schools access capital to purchase, lease, renovate, or construct a school facility.	$56.3 million[16]	Provides access to capital markets Reduces interest rates	Insufficient to meet demand
State Charter School Facilities Incentive (Education)	This program provides competitive grants to help states establish and enhance or administer charter school per-pupil facilities aid programs. Program funds are used to match programs funded by nonfederal dollars. The federal government makes payments for a maximum of five years, with the federal share of funds decreasing each year (from a 90 percent match in year one to 20 percent match in year five).	$0[17] (No funding for new awards since FY 2014)	Provides direct grants	Restricted to states with specific programs in place Very limited funding
New Markets Tax Credit (Treasury)	Through this program, the U.S. Treasury competitively allocates tax credit authority to intermediaries (called community development entities or CDEs) that make loans to or investments in select projects.[18] CDEs sell these tax credits to investors, who receive a credit against their federal income tax. CDEs then use the funds to make debt or equity investments in entities located in qualified low-income communities, including charter schools.[19]	$3.5 billion[20] (Per year in qualifying investments)	Reduces interest rates	Insufficient to meet demand Complex

*Table continues on page 6.

EXISTING FEDERAL PROGRAMS

PROGRAM (DEPARTMENT)	OVERVIEW	FY 2017 FUNDING	STRENGTHS	CHALLENGES
Bond Guarantee Program (Treasury)	This program creates a source of 30-year capital for Community Development Financial Institutions (CDFIs) to support lending and investment for projects in low-income communities, including public charter schools. Through the BGP, qualified entities apply to the CDFI Fund for authorization to issue bonds worth a minimum of $100 million. The federal government guarantees these bonds, and CDFIs use the bond proceeds to extend credit for community development purposes or to refinance certain existing obligations. Unlike other CDFI Fund programs, the BGP does not offer grants or direct loans, but is instead a federal credit subsidy program. The bond proceeds are debt instruments, which CDFIs must repay.	Through FY 2016, more than $300 million has been guaranteed in bonds to CDFIs.	Reduces interest rates	Difficult for CDFIs to demonstrate eligibility Cannot combine with Credit Enhancement
Private Activity Bonds (Treasury)	Typically, bonds that primarily benefit the activities of private (non-governmental) entities are taxable; however, this program allows states and cities to borrow on behalf of certain *qualified* private activities, such as airports, port authorities, hospitals, or education facilities.[21] These bonds can lower borrowing costs for private entities that might otherwise turn to more expensive corporate bonds or bank loans.	In 2016, charter school bond issuance totaled $2.9 billion[22]	Reduces interest rates	Complex transaction structure
Qualified Zone Academy Bonds (Treasury)	This program provides bondholders with a federal tax credit in lieu of a cash interest payment to help lower the cost of schools' renovation and repair projects (funds cannot be used for new construction). The federal government allocates QZAB funds to states based on poverty counts; local educational agencies can then apply to the state for authorization to issue these bonds to eligible schools. To be eligible, schools must; • Enter into partnership with a local business that both provides a 10 percent match and helps the school implement a special academic program aimed at increasing academic performance; and • Be located in an empowerment zone or community (defined by the Department of Housing and Urban Development as part of targeted economic revitalization initiatives in distressed urban and rural communities[23]) or have at least 35 percent of students eligible for free or reduced-price lunch.[24]	$400 million[25](Annual cap on bond issuances) Note: This program was eliminated in December 2017; no new funding will be available	Reduces interest rates	Restricted to specific uses No longer operating as of December 2017

In addition to the general strengths and challenges noted in the table above, these programs affect different types of charter schools in different ways. While they can ease the barriers that charter schools face in financing facilities, they often come with significant barriers of their own.

- **Limited access to intermediary partners:**
  Nonprofit community lending entities like CDFIs serve as intermediaries for the Credit Enhancement Program and the New Markets Tax Credit Program, but the number and scale of existing CDFIs leave significant gaps in the charter sector.
- **Lack of academic track record/credit history:**
  Similar to commercial banks, CDFIs, and other intermediary entities are incentivized to partner with low-risk schools—those that have a track record of academic success, have a good chance of charter renewal, and have a credit history either independently or through a CMO. This puts new independent charter schools at a disadvantage.
- **State's participation in program:**
  The State Facilities Incentive Grant runs through state departments of education, which must apply to participate and are only eligible for the program if the state has a per-pupil facilities allocation for charter schools. Charter schools do not benefit from this program unless they are in a state that meets these criteria.
- **Geographic eligibility requirements:**
  The USDA Community Facilities Grant is only accessible to rural charter schools.
- **Complexity of application process:**
  Navigating application requirements can be a complex and time-consuming process, which can be a barrier for new and/or independent schools that lack the experience and central office capacity.
- **Competition from other, non-school projects:**
  Both the USDA Community Facilities Grant and the New Markets Tax Credit are accessible to numerous types of organizations and projects, not just charter school facilities, increasing the degree of competition for funding.

Community Development Financial Institutions (CDFIs)

- CDFIs help spur economic development in low-income communities.[26]
- CDFIs are private financial institutions including banks, credit unions, loan funds, microloan funds, or venture capital providers.
- CDFIs can provide tailored and innovative financial services, including combining federal and private capital, to support local residents and businesses.[27]

In some cases, these barriers are absolute. A charter school must be located in a rural area in order to benefit from USDA funding. In other cases, these barriers simply make it more or less difficult for different types of schools to take advantage of the programs. As shown in the chart on the next page, established CMO-operated schools (green) have the greatest access, while new-start, independent charter schools (red) face more barriers. New-start, independent charter schools may find it *even more* difficult to access facilities programs if they are pioneering a new, innovative, but untested school model.

SCHOOL TYPE, PERCENT OF ALL CHARTER SCHOOLS	CREDIT ENHANCEMENT PROGRAM	SCHOOL FACILITIES INCENTIVE GRANTS	USDA COMMUNITY FACILITY GRANTS	BOND GUARANTEE PROGRAM	NEW MARKETS TAX CREDIT PROGRAM
Barriers to Access	-Charters often partner with nonprofit intermediary community lending entities like CDFIs to access this program; these entities favor schools w/ academic track records/ credit histories	-Must be in participating state	-Must be rural -Must compete with non-school development projects	-Charters must partner with nonprofit intermediary community lending entities like CDFIs to access this program; these entities favor schools w/academic track records/credit histories -Cannot be used for construction. -Loan to value (LTV) capped at 80% -Must compete with non-school development projects	-Charters often partner with nonprofit intermediary community lending entities like CDFIs to access this program; these entities favor schools w/ academic track records/ credit histories
New-start, Independent (44%)	Lack of academic track record/credit history makes school less appealing to nonprofit intermediary community lending entities	Might not operate in a participating state	Might not operate in a rural area Might not be able to compete with non-school programs	Lack of academic track record/credit history makes school less appealing to nonprofit intermediary community lending entities May not be able to compete with non-school programs	Lack of academic track record/credit history makes school less appealing to nonprofit intermediary community lending entities May not be able to compete with non-school programs
New-start, CMO operated (12%)	Academic track record/ credit history makes school more appealing to nonprofit intermediary community lending entities	Might not operate in a participating state	Might not operate in a rural area Might not be able to compete with non-school programs	Limited academic track record/credit history makes school less appealing to nonprofit intermediary community lending entities May not be able to compete with non-school programs	Limited academic track record/credit history makes school less appealing to nonprofit intermediary community lending entities May not be able to compete with non-school programs
Established, Independent (44%)	Academic track record/ credit history makes school more appealing to nonprofit intermediary community lending entities	Might not operate in a participating state	Might not operate in a rural area Might not be able to compete with non-school programs	Academic track record/credit history makes school more appealing to nonprofit intermediary community lending entities May not be able to compete with non-school programs	Academic track record/credit history makes school more appealing to nonprofit intermediary community lending entities May not be able to compete with non-school programs
Established, CMO operated (24%)	Academic track record across numerous schools/ credit history make schools most appealing to nonprofit intermediary community lending entities	Might not operate in a participating state	Might not operate in a rural area Might not be able to compete with non-school programs	Academic track record across numerous schools/credit history make schools most appealing to nonprofit intermediary community lending entities May not be able to compete with non-school programs	Academic track record across numerous schools/credit history make schools most appealing to nonprofit intermediary community lending entities May not be able to compete with non-school programs

Established schools that are CMO operated have the greatest access to charter facilities programs, because they have a school and organizational history that can lower their risk assessment from intermediary entities like CDFIs. For established CMO-operated schools, CDFIs can assess their risk by pointing to their academic track record, predicting the likelihood of charter renewal, and evaluating their credit history. New-start charter schools—especially those that are independently operated—do not have these pieces of information and therefore tend to be higher-risk partners for CDFIs.

At the same time, CMO-operated schools and established schools are much more likely to have the organizational capacity required to navigate the applications and requirements of complex programs, like the former Qualified Zone Academy Bond Program.

Rural charter schools also deserve some further explication. They are uniquely eligible to access funding from the USDA Community Facilities Grant, which would appear to be an advantage. Unfortunately, the USDA program does not meet the demand for rural charter school facilities, and rural charter schools also struggle to access other programs that tend to favor CMO-operated schools in urban communities.

Simply putting more funds into current mechanisms will not address all of these challenges. The sector is in need of a more comprehensive federal policy approach. The following sections identify policy options for federal policymakers that will address challenges, eliminate complexities, and ensure charter schools have more equitable access to facilities.

FEDERAL POLICYMAKERS SHOULD STRENGTHEN EXISTING PROGRAMS

There are three existing programs that are either working well or could be improved: The Credit Enhancement for Charter School Facilities Program, the Community Facilities Direct Loan & Grant Program, and the State Facilities Incentive Grant. Below are suggestions for strengthening these programs to ensure that they are available to a wider and more diverse set of charter schools.

Existing Program 1: Credit Enhancement for Charter School Facilities

The Credit Enhancement for Charter School Facilities program is part of the U.S. Department of Education's Charter Schools Program (CSP)) and has played a significant role in providing charter schools with greater access to capital. It was created in 2001 and grants funds on a competitive basis to nonprofit intermediary community lending entities like CDFIs that assist charter schools in leveraging capital from the private sector. In short, these public and nonprofit entities use funds to guarantee or insure loans and leases for charter schools. These guarantees and insurances reduce the risk for lenders, lower interest rates, and enable lenders to provide more flexible financing terms, all of which ultimately help charter schools access the capital they need to acquire, construct, and renovate school facilities.[28]

Between 2001 and 2016, the Credit Enhancement program made awards to 24 public and nonprofit entities totaling nearly $300 million. These grantees then provided financing to 566 charter schools to help them access facilities — leveraging more than $4 billion in private capital on behalf of charter school facilities.[29] In FY 2017, the U.S. Department of Education allocated $56 million to the credit enhancement program, a more than $40 million increase. [30]

Despite the high level of uptake and record-level funding, the credit enhancement program does not serve all types of charter schools equally. In particular, new-start, independent, and rural charter schools may have a more difficult time taking advantage of the credit enhancement program.

These schools have limited track records and, as a result, nonprofit intermediary community lending entities like CDFIs may view them as higher investment risks than more established, CMO-operated schools. This is a challenge for the charter sector, which should continue to encourage, advance, and support innovation.

While some CDFIs do work specifically with these types of "higher-risk" schools, additional funding and greater incentives for CDFIs to invest in these schools would help expand the reach of the credit enhancement program and help support innovation in the sector. To strengthen the program and enable even more charters to take advantage of it:

- Policymakers should be more systematic about the review and analysis of data collected by grantees, in order to identify gaps and track the types of schools that are benefiting from the program. Data collection and analysis should include the types of schools that benefit from credit enhancement, the students they serve, how they use the funding, and their long-term outcomes.

- Policymakers should incentivize lenders to underwrite charter schools that may rate as being a higher risk using current metrics. To do so, policymakers could create a guaranty fund through which the federal government refunds up to a certain percentage of losses, or create an accountability mechanism associated with the risk profile of deals to prioritize allocation of funds toward CDFIs that partner with charter schools with higher (but reasonable) risk profiles. These or other mechanisms would encourage lenders to work with new, innovative, and geographically diverse school models. Creating such incentives could also help develop a track record of successfully supporting operators that were previously considered more of a risk.

- Policymakers should continue to increase funding for the program. In 2008, funding for the credit enhancement program dropped from more than $36 million to just above $8 million.[31] Though Congress has been increasing funding amounts each year, 2017 marks the first year in nearly a decade where allocations met (or exceeded) Bush-era funding levels. In order for charter schools to continue to benefit from credit enhancement, Congress must continue to increase its funding allocations.

The credit enhancement program is strong and ought to be continued, but simply increasing funding for this program will not alone solve the broader facilities challenges that charter schools are facing. Policymakers must ensure that funding and incentives are in place to encourage CDFIs and other nonprofit intermediary community lending entities to work with new and/or innovative schools.

Existing Program 2: Community Facilities Direct Loan & Grant Program

Operated by the U.S. Department of Agriculture (USDA), the Community Facilities Direct Loan & Grant Program provides low-interest direct loans, guaranties, and grants to public entities and nonprofit organizations that are building "essential community facilities" in rural areas and towns of up to 20,000 in population.[32]

Some charter schools have successfully accessed financing through this program, but several constraints limit its reach:

- The program is limited to communities with a population of up to 20,000 people, which means even slightly larger, high-need rural and small-town communities are not eligible.

- The local offices that implement this program (and to which potential grantees must apply) do not prioritize charter facilities. They tend to invest in existing infrastructure and, in some places, local decision-makers who control the funds and oppose charter schools can restrict charter schools' access to these funds.

- The USDA currently requires a certified public accountant firm to perform an independent verification of the project's financial assumptions prior to approving the project. This process considers a number of factors, including audited financial statements, market analysis, and operational costs[33] and can be time-consuming. The approval process is therefore quite slow, taking more time than charter schools typically have to secure financing for their facilities.

This program provides access to facilities financing for a set of charter schools that help meet the needs of underserved students in rural America. Therefore, to strengthen the program and help additional rural schools access it:

- Policymakers should align the definition of "rural" across agencies. The USDA defines rural communities as those of 20,000 or fewer people, while the U.S. Census Bureau uses a complex array of factors to define rural communities as those that are *not* urban.[34] A consistent definition among agencies would ensure that all charter schools operating in rural communities could apply for funding. Moreover, increasing this threshold would expand access to small-town charter schools that serve communities with characteristics similar to rural communities.

- Policymakers should encourage state offices to prioritize charter facilities in their applications. This program provides support to organizations in a number of categories, including healthcare, public facilities, community support, public safety, utility services, and food systems. This means that rural charter schools are competing for limited funds with a breadth of local agencies and interest groups. A statement of prioritization of charter needs would encourage more awards for rural charter schools.

- Policymakers should modify the feasibility study component of the application process to speed up the approval timeline. Increasing the requirements for the organizations that receive awards from the USDA and distribute funds can help ensure valid financial assumptions, without independent verification from a certified public accountant. This could help speed up the timeline and help more charter schools take advantage of this program.

These improvements will help make this program a stronger source of funding for charter schools outside the country's urban centers.

Existing Program 3: State Facilities Incentive Grant

The State Facilities Incentive Grant (SFIG), which is also part of the CSP, provides competitive grants to states to help them establish or enhance and administer per-pupil facilities aid programs for charter schools. States receive federal funds to match nonfederal funds that provide charter schools with facilities operating support. Grants are made for a maximum of five years, with the federal share of funds decreasing each year (90 percent in year one down to 20 percent in year five).[35]

The SFIG does not work well in its current structure. To date, just five states have benefited from the program, with the majority of funds going to California.[36] There are two fundamental problems with the program that have contributed to so few states embracing it:

- Program funds may not be available immediately upon a state's adoption of a per-pupil facilities aid program, which dilutes the incentive for states to enact such programs. In effect, if a state creates a per-pupil allocation for charter facilities, that state will likely have to foot the bill for administering the first year or more of funding until a new SFIG application cycle begins and they can apply for a grant. Moreover, states must still apply for funding once they implement an eligible program, meaning that there is no guarantee of receiving SFIG funding.

- The program is too narrow, as states only qualify for SFIG if they adopt a per-pupil facilities fund program. However, there are a number of policies that states can (and do) adopt to help charter schools access facilities, and these other policies do not make states eligible for this program.

In order to make SFIG more attractive to a larger number of states, the program would need a complete overhaul. In particular, federal policymakers would need to make the funds available on an annual basis so states become eligible and receive funding immediately after passing eligible legislation. In addition, policymakers would need to expand the classification of state programs that could benefit from this funding, to include, for example, policies requiring districts and/or cities to turn over vacant taxpayer-funded properties or complete separation of school facility management from school districts, among others. If these fundamental changes are not viable, policymakers ought to consider eliminating and redirecting SFIG resources to better-functioning programs.

CREATE NEW PROGRAMS TAILORED TO NEEDS OF CHARTER SCHOOLS

Policymakers can modify the programs described in the previous section to increase their impact on charter schools, but should also consider two new ways to support the continued growth of charter schools: an infusion of funding and financing authority are critical to support the continued growth of charter schools. These require new programs.

Since charter schools are public schools, it makes sense for the public sector to create incentives and level the playing field for charter schools. The new programs proposed here aim to promote better access to facilities financing for all types of charter schools and incentivize states to adopt policies that support charter schools' access to facilities and financing.

New Program 1: Charter School Infrastructure Tax Credit Program

A new program, Charter School Infrastructure Tax Credits (CSITCs), would improve charter schools' access to the capital they need to obtain and operate in high-quality facilities and provide charter schools with a longer-term financing option.[37] The existing Credit Enhancement program, for example, tends to be used for short-term financing like facilities acquisition (though some deals are structured to enable funding for a longer period of time). The New Markets Tax Credit (NMTC) program discussed below provides medium-term financing for a period of seven years. Charter schools, however, are also in need of substantially longer-term financing options (20-30 years).

The CSITC program could be created in a way that uses many of the structures and processes that already exist under the QZAB and NMTC program. This means that this new, single-purpose program would require little in the way of complex new technical infrastructure, but would lack the current many obstacles to utilizing those programs that charter school currently face.

FIGURE 2: CHALLENGES CHARTER SCHOOLS FACE IN USING NMTCs

The NMTC program attracts private capital into low-income communities by permitting individual and corporate investors to receive a credit against their federal income tax in exchange for investments in specific community development entities (CDEs). CDEs then make investments in or loans to qualified organizations, including charter schools.

NMTCs have worked well for many charters. Between 2003 and 2016, nearly $2 billion in NMTCs went to charter school deals, helping those charters secure $3.2 billion in financing for school facilities.[38] However, current CDEs are requesting allocations that exceed available funds by more than six times. Between 2003 and 2017, CDEs requested $335.4 billion in allocation authority, but were awarded just $53.8 billion.[39]

An increase in NMTC funding would not sufficiently improve charter schools' access to the program for a number of reasons:

- The NMTC program's complex structure means that charter schools must retain significant legal counsel to navigate the process, which is costly and ultimately reduces the full financial benefit available to the schools.
- Investors can only claim tax credits through this program for seven years,[40] while other programs extend much longer. This relatively compressed period of time could be a deterrent to certain investors who may wish to claim the tax credits strategically over a longer period of time.

Policymakers should consider these limitations in the NMTC program as they design and implement the CSITC program proposed here.

Like other tax credit programs that the federal government already operates, the CSITC program would provide public funding to incentivize private investment. Specifically, it would enable the sale of charter school infrastructure bonds and notes to investors in the capital markets in the same manner that other bonds and notes are sold. Investors would receive federal tax credits for the purchase of these notes, which would supplant the school's interest payments. The Treasury Department could administer and implement the CSITC program similarly to other tax credit programs.

Policymakers should model the process for distributing CSITC program tax credits after the NMTC program's process. There are three main steps to this process:

1. The Treasury Department identifies qualified entities to which it allocates the tax credits. In the NMTC program, these qualified entities are known as community development entities or CDEs. Treasury could use a similar process to identify qualified charter finance entities (CFEs) that are better tailored to the charter school community and its needs, helping ensure that a variety of charter schools can access funding through this program. The Treasury Department would assess and approve CFEs based on their experience underwriting charter schools and on their ability to efficiently deploy assets.

2. Once the Treasury Department identifies a CFE, the CFE in turn must ensure tax credits are allocated to high-quality charter facility projects. CFEs would be charged with (a) assessing a charter school's quality as a borrower in terms of its academics, finances, operations, and governance and (b) analyzing a proposed bond transaction in terms of its construction costs, affordability, etc. A CFE would then approve or decline a proposed transaction based on these factors. CDFIs already operate in this capacity on behalf of charter schools through the NMTC program, and would be ideal CFEs for the CSITC program.

3. For approved projects, CFEs would receive tax credit allocations from the Treasury Department, structure deals with investors (who would receive the tax credits in lieu of interest payments), and provide ongoing monitoring of the projects.

Revising current programs, like the NMTC, to better meet the specific needs of charter schools would require balancing the complex and competing interests of those that access the NMTC for other purposes. Instead, while maintaining charter school access to the NMTC, federal policymakers should create a new program specifically designed to meet the needs of charter schools in the longer term. This is a simpler and more straightforward approach to ensuring that charter schools can access facilities financing and does not reduce benefits to other types of organizations that participate in the NMTC program.

With the recent passage of the Tax Cuts and Jobs Act in December 2017, the reduction of the corporate tax rate may change the market's demand for tax credits. This proposal would also work if tax deferrals or exemptions were allocated in lieu of credits, similar to the newly created Opportunity Zones.

New Program 2: Targeted "Equitable School Facilities Investment Program"

An important component of any new facilities legislation is that it enables charter schools that are often viewed as higher risk by traditional lenders, such as those run by independent operators, those in their first few years of operation, or those with new or innovative models, to access facilities. To meet the needs of these schools, federal policymakers should create an additional program targeted specifically at meeting the needs of schools with profiles that could be considered higher risk.

This program should do two things:

- It must target three distinct groups of schools that experience significant difficulty accessing financing through current programs: 1) early-stage schools that are in their first three to five years of operation; 2) independent charter school operators that are not affiliated with a CMO; and 3) small schools operating nontraditional programs.

- It must provide an incentive for lenders to take on the additional risk related to financing early-stage and independent charter schools. Providing a guaranty to reimburse losses up to a certain percentage is one possible approach.

This program could take a variety of structures. One would be to mimic the structure of the USDA Community Facilities Direct Loan & Grant Program (discussed previously on page 10).

A new program specifically focused on supporting charter schools that may be considered high-risk could offer the same types of funding provided by the USDA program to eligible startup and independent charter schools:

- Direct loans at low interest rates to help charter schools finance a facility;

- Grants to help schools fund various stages of the work, for example to enable a school to hire an expert consultant during the pre-development phase; and

- Loan guaranties to private lenders who make loans to high-risk charter schools.

The U.S. Department of Education would be the most natural fit to house this program, though additional capacity and staff expertise may be needed to oversee the implementation of the financial mechanisms and ensure robust implementation at the local level.

Alternatively, instead of providing direct grants, this program could provide grants to intermediaries, like CDFIs, either as a separate program or as a supplementary set-aside to the existing Credit Enhancement for Charter School Facilities program.

Access to intermediaries like CDFIs varies by geography so, if policymakers pursue this option, they should include capacity grants to existing high-quality intermediaries. These capacity grants could help CDFIs and others that are already lending to charter schools expand to new territories, or enable high-quality intermediaries not currently lending to charter schools to build capacity and expertise to begin lending to charter schools. These grants could be mirrored after, or perhaps consolidated with, the existing Technical Assistance grant program operated by the Treasury Department as part of their CDFI Fund.[41]

This program also could be run by the U.S. Department of Education but administered by intermediaries to keep costs low.

FIGURE 3: INCENTIVIZING STATE ACTION THROUGH FEDERAL DOLLARS

Federal policymakers have a role to play in directly improving charter schools' access to facilities financing. But there are numerous state-level policies that can also help. Federal policymakers can and should incentivize states to adopt policies and programs that support charter schools in accessing facilities.

A boost in infrastructure funding could be used for this purpose. For example, federal policymakers could require states to set aside a proportion of infrastructure funding equal to the proportion of students enrolled in charter schools in a particular state or community, or it could set a representative proportion aside at the national level to be allocated to charter schools.

Alternatively, an infrastructure spending program could condition funding or create financial incentives to encourage the equitable treatment of charter schools in state policies. For example, states could be prioritized if they give charter schools the first right of refusal when public buildings become available, or prohibit deed restrictions that prevent public buildings from being sold or otherwise granted for educational purposes.

Federal policymakers could also choose to use new funding to incentivize states to adopt a broader range of charter facility policies. The SFIG program currently offers a cash incentive to states to adopt a single policy: a per-pupil charter facilities program. However, grant applications for new funding could include a competitive priority for states that adopt other charter school facilities policies, like right of first refusal laws or the complete separation of school facility management from school districts.

Policymakers could also offer a less prescriptive option to states, allowing them to create a plan or program that makes sense in their individual contexts and present these ideas, along with relevant evidence, to the U.S. Department of Education in order to receive a grant. States would receive prioritized funding based on their proposed program's likelihood of improving charter school facilities and reducing the need for future facilities support.

CONCLUSION

When it comes to increasing charter schools' access to facilities, policymakers have a number of promising options to improve existing programs and create new programs. The table below summarizes our recommendations:

PROGRAM NAME	SUMMARY OF RECOMMENDATIONS
Credit Enhancement for Charter School Facilities	Review and analyze data about what kinds of charter schools participate in and benefit from the program, better identify gaps, and help policymakers ensure all types of schools are able to benefit from the program. Incentivize lenders to take more risk to ensure that new, innovative, and geographically diverse school models can take advantage of the program. Continue to increase funding for the program.
Community Facilities Direct Loan & Grant Program	Align definitions of "rural" across agencies to increase clarity. Broaden eligibility requirements to include small towns that face similar challenges to rural communities. Encourage local agencies to prioritize charter facilities in their applications. Modify the feasibility study component of the application process to accelerate the approval timeline.
State Facilities Incentive Grant	Make funds available on an annual basis so states become eligible and receive funding immediately after passing eligible legislation. Expand the types of state programs that could benefit from this funding.
Charter School Infrastructure Tax Credit Program	The CSITC program would sell charter school infrastructure bonds and notes to investors in the capital markets in the same manner as other bonds and notes are sold. Investors would receive federal tax credits for the purchase of these notes, which would supplant the school's interest payments. This program would be tailored to address the specific needs of charter schools and improve charter schools' access to the capital they need to obtain and operate in high-quality facilities.
Equitable School Facilities Investment Program	This program would provide targeted support to charter schools that are typically viewed as higher risk by traditional lenders, such as those run by independent operators rather than charter management organizations (CMOs), those in their first few years of operation, or those with new or innovative models, to access financing for facilities. It could offer a variety of funding options to eligible startup and independent charter schools, including: • Direct loans at low interest rates to help charter schools finance a facility; • Grants to help schools fund various stages of the work, for example to enable a school to hire an expert consultant during the pre-development phase; and • Loan guaranties to private lenders who make loans to certain charter schools viewed as a higher risk. Or, it could provide grants to intermediaries, like CDFIs, either as a separate program or as a supplementary set-aside to the credit enhancement program, and couple these grants with a CDFI capacity-building grant to ensure all charter schools have access to a CDFI and thus, this program.
Incentivize State Action	Federal policymakers could use new funding to incentivize state action. For example, federal policymakers could require states to set aside a proportion of infrastructure funding equal to the proportion of students enrolled in charter schools in a particular state or community, or it could set a representative proportion aside at the national level to be allocated to charter schools. Policymakers could also condition funding or create incentives to encourage the equitable treatment of charter schools in state policies or use new funding to incentivize states to adopt a broader range of charter facility policies.

This package of reforms offers a set of comprehensive federal solutions for equalizing charter schools' access to facilities. These reforms would enhance what is already working well and create new, efficient programs to ensure that all charter schools—including those that are higher-risk—are able to access financing. Collectively, the suggestions we offer will help equalize access to facilities for charter schools, ensuring that new schools can launch and that existing, high-performing schools can expand to meet current and future demand.

[1]Center for Research on Education Outcomes, "Urban Charter School Study Report on 41 Regions" (Stanford, CA: Stanford University, 2015), https://urbancharters.stanford.edu/download/Urban%20Charter%20School%20Study%20Report%20on%2041%20Regions.pdf.

[2]These estimates are based on the fact that 10-17 percent of parents list charter schools as their first choice. See: National Alliance for Public Charter Schools, "Parent Survey Report," 2016, http://www.publiccharters.org/wp-content/uploads/2016/04/Parent-Survey-Report.pdf?x87663 and "The 49th Annual PDK Poll of the Public's Attitudes Toward the Public Schools," Kappan, supplement, September 2017, http://pdkpoll.org/assets/downloads/PDKnational_poll_2017.pdf.

[3]NAPCS, "Estimated Charter Public School Enrollment, 2016-17," http://www.publiccharters.org/wp-content/uploads/2017/01/EER_Report_V5.pdf.

[4]These estimates are based on the fact that 10-17 percent of parents list charter schools as their first choice. See: NAPCS, "Parent Survey Report," 2016, http://www.publiccharters.org/wp-content/uploads/2016/04/Parent-Survey-Report.pdf?x87663 and "The 49th Annual PDK Poll of the Public's Attitudes Toward the Public Schools," Kappan, http://pdkpoll.org/assets/downloads/PDKnational_poll_2017.pdf.

[5]CREDO, "Urban Charter School Study Report on 41 Regions."

[6]NAPCS, "Equitable Access to Capital Funding and Facilities," https://www.publiccharters.org/our-work/charter-law-database/components/19.

[7]Colorado League of Charter Schools and NAPCS, "Charter School Facilities Initiative: Initial Findings from Twelve States," November 2013, http://facilitiesinitiative.org/media/1229/csfinationalsummary_12states.pdf.

[8]Table 1: Sean Gill and Tricia Maas, "Opening the Schoolhouse Door: Helping Charter Schools Access Space in District-Owned Facilities," CRPE, December 2017, https://www.crpe.org/sites/default/files/crpe-opening-schoolhouse-door.pdf. Though some states have laws that allow charters to access district facilities under certain circumstances, these laws often lack clarity or real enforcement mechanisms and give districts the upper hand in decisions about which buildings can be made available to charter schools.

[9]Table 1: Gill and Maas, "Opening the Schoolhouse Door," https://www.crpe.org/sites/default/files/crpe-opening-schoolhouse-door.pdf.

[10]Assumes one building per charter school.

[11]The range of charter school facilities costs is wide and varies depending on a number of factors like geography and school size. Based on communication with Mark Medema, the authors used the following information to estimate an average: 40,000 square feet (buildings tend to range from 25,000 square feet to 100,000 square feet, with most on the smaller end) * $160/square foot (with a range from $120-$400 depending on the city) = $6.4 million.

[12]NAPCS, "Estimated Charter Public School Enrollment, 2016-17," https://www.publiccharters.org/sites/default/files/migrated/wp-content/uploads/2017/01/EER_Report_V5.pdf.

[13]National Center for Education Statistics, "Fast Facts: Expenditures," https://nces.ed.gov/fastfacts/display.asp?id=66.

[14]Estimate of average facilities costs based on correspondence with Mark Medema.

[15]US Department of Agriculture, "FY 2017 Budget Summary," p. 46, https://www.obpa.usda.gov/budsum/fy17budsum.pdf.

[16]US Department of Education, Office of Innovation & Improvement, "Credit Enhancement for Charter School Facilities Program: Funding and Legislation," https://innovation.ed.gov/what-we-do/charter-schools/credit-enhancement-for-charter-school-facilities-program/funding-and-legislation/.

[17]Office of Innovation & Improvement, "State Charter School Facilities Incentive Grants: Funding and Legislation," https://innovation.ed.gov/what-we-do/charter-schools/state-charter-school-facilities-incentive-grants/funding-and-legislation/.

[18]Tax Policy Center, Urban Institute & Brookings Institution, "Briefing Book: What is the New Markets Tax Credit, and How Does it Work?," http://www.taxpolicycenter.org/briefing-book/what-new-markets-tax-credit-and-how-does-it-work.

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[20]US Department of the Treasury, "FY 2017 Budget in Brief," p. 43, https://www.treasury.gov/about/budget-performance/budget-in-brief/BIB17/FY%202017%20Budget%20in%20Brief.pdf.

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[22]Email correspondence with Wendy Berry at NewOak Capital, January 24, 2018.

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[25]Ibid.

[26]Department of the Treasury, CDFI Fund, “What Are CDFIs?,” https://www.cdfifund.gov/Documents/CDFI_infographic_v08A.pdf.

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[28]Department of Education, “Credit Enhancement for Charter School Facilities Program,” https://www2.ed.gov/programs/charterfacilities/index.html.

[29]LISC, “Credit Enhancement for Charter School Facilities Program,” http://www.lisc.org/charter-schools/funding-options/us-department-education/credit-enhancement-charter-school-facilities-program/.

[30]Office of Innovation & Improvement, “Credit Enhancement for Charter School Facilities Program,” https://innovation.ed.gov/what-we-do/charter-schools/credit-enhancement-for-charter-school-facilities-program/.

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[32]USDA Rural Development, “Community Facilities Direct Loan & Grant Program,” https://www.rd.usda.gov/programs-services/community-facilities-direct-loan-grant-program.

[33]USDA Rural Development, “Community Facilities Infrastructure Toolkit,” January 2016, https://www.rd.usda.gov/files/RDCFIToolkit_Jan2016.pdf.

[34]US Census Bureau, “2010 Census Urban Area FAQs,” https://www.census.gov/geo/reference/ua/uafaq.html.

[35]Department of Education, “State Charter School Facilities Incentive Grants: Legislation, Regulations, and Guidance,” https://www2.ed.gov/programs/statecharter/legislation.html.

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APPENDIX OF CONVENING ATTENDEES

Alex Shawe, Level Field Partners

Amy Wilkins, National Alliance for Public Charter Schools

Bert Wyman, Office of Management and Budget

Brad Miller, Challenge Foundation Properties

Bryan Hassel, Public Impact

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Eric Paisner, National Alliance for Public Charter Schools

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