

December 4, 2023

The Honorable Miguel Cardona
Secretary
U.S. Department of Education
400 Maryland Avenue, SW
Washington, D.C. 20202

Dear Secretary Cardona:

We write to express our deep concern regarding the two Charter School Programs awards given to Cincinnati Classical Academy (CCA), a Hillsdale member charter school. CCA received a \$100,000 planning grant from Ohio's State Entities grant in 2021-2022, and in 2023, a Developer grant directly from your Department in the amount of \$1,991,846. This letter provides evidence that the application submitted to your Department contained false and misleading information on which the award was based.

Further, after reading the three application reviewers' notes, it is apparent that no attempt was made to fact-check the application. Instead, the reviewers ignored what should have been obvious red flags, as we explain below.

A detailed summary of the false and misleading information presented in the application is also provided. We ask you to investigate the awardee Cincinnati Classical Academy's application and claims and terminate the grant based on that review.

Evidence of the Intent to Mislead the Department Regarding the Purpose of the Grant

Throughout the application, the charter school repeats that it is worthy of the grant because CCA exists to provide a high-quality alternative for disadvantaged students in Cincinnati's public schools. The first two objectives, as stated in the application, are as follows: (1) help to close the achievement gap for economically disadvantaged students in southwestern Ohio; (2) continue to provide a proven and tuition-free charter school option to underserved children and families in an area where limited options for quality schools exist.

To make its case, the application cites demographic information for the city of Cincinnati, which, according to the application, is 41.37% African American/Black, 53.3% white, and has a high poverty rate. Helping students escape poverty and serving underserved students continue as themes throughout the application, justifying the grant.

However, as the table below shows, the school is not serving the underserved students of the area but rather a population that is dramatically whiter and wealthier than not only the city of Cincinnati but the entire County of Hamilton.

The table below provides the 2022-2023 school year demographic distribution of students in the Cincinnati School District public schools, all Hamilton County Schools, all charter schools in Hamilton County, and the applicant—Cincinnati Classical Academy. School enrollment was 452. The demographics of CCA do not reflect either Cincinnati School District public schools or the schools of Hamilton County, which the charter school purports to serve.

2022-2023 School Demographics: CCA vs the Greater Cincinnati Area

	% Economically Disadvantaged	% White	% Black	SWD	ELL
Cincinnati Public Schools ¹	80.7%	20.5%	60.5%	20.6%	9.2%
All Hamilton County School Districts ²	52.5%	46.2%	33.8%	15%	7.2%
All Hamilton County Charter Schools ³	85.2%	4%	81.5%	12.1%	2.1%
Cincinnati Classical⁴	16.6%	82.4%	2.4%	9.6%	0%

The applicant certainly knew the disproportionate enrollment of wealthier white students in the charter school when it submitted its application in July of 2023. According to the application, 98.2% of the 2022-23 students were returning in 2023-2024; therefore, the applicant also knew that the school's demographics would remain stable. It was merely adding a grade level to accommodate its present sixth-grade class.

Yet, it never provided a demographic breakdown of its students for its first or second year; it only gave a demographic breakdown of the population of Cincinnati. Nor did it acknowledge the under-enrollment of disadvantaged students or put forth a plan to address it. None of its goals and objectives address the lack of diversity and under-enrollment of underserved students. Even more concerning is that the three reviewers never noted the absence of demographic information and instead parroted the application's assertion that the school was in a high-needs area.

In summary, although the applicant stated its mission to be closing the achievement gap and serving disadvantaged students, the applicant knew that its student body made the serious fulfillment of that mission impossible. We also believe this disproportionality in enrollment is by design, as explained below.

Location of Cincinnati Classical Academy

The applicant states the following regarding the location of the charter school: “The location within a diverse neighborhood with access to direct route highways to all areas of the city has allowed CCA to provide a high-quality tuition-free classical education model to a diverse student population, including student’s [sic] representative of urban intergenerational poverty and those experiencing social and economic deprivation during childhood and adolescence.”

Although the school’s mailing address gives the impression that the school is located in Cincinnati, the school is located in Reading, Ohio, a city that is an inner suburb of the Cincinnati metropolitan area.

¹ Data can be found here: <https://reportcard.education.ohio.gov/district/detail/043752>

² Data obtained from the 2022-23 database <https://education.ohio.gov/Topics/Data/Frequently-Requested-Data/Enrollment-Data>

³ Data obtained from the 2022-23 database charter school tab <https://education.ohio.gov/Topics/Data/Frequently-Requested-Data/Enrollment-Data>

⁴ Data can be found here: <https://reportcard.education.ohio.gov/school/detail/019530>The number of ELL students was obtained from the Ohio Education Department database which can be found here: <https://education.ohio.gov/Topics/Data/Frequently-Requested-Data/Enrollment-Data>.

According to the latest census, 84.8% of Reading residents are white, 7.7% are Black, and 10.6% live in poverty⁵. The village of Evendale that abuts the school property is also predominantly white and has a poverty rate of 2.8%,⁶ significantly below the Cincinnati rate of 24.7%⁷, which is nearly twice the national rate.

The location of the school was a deliberate choice. According to the school's website, the charter school had sought to locate the school in the former Catholic school facility since 2020. From the website:

*The new school has had interest in the property since 2020, but at that time Ohio law allowed public community schools to locate only in "challenged" school districts. That did not include Reading. In a surprise turn of events, Ohio H.B. 110 removed this restriction starting July 1, 2021. "We were elated. We contacted the parish immediately to explore their interest," Hartings said. "We were so fortunate to find a community that shares our values and goals, and that embraced the kind of school we are offering. The campus means a lot to the community, which has several generations of memories there."*⁸

According to the submitted application, the charter school gives preference to resident children of the Reading Community School District, as required by Ohio State law. Therefore, the placement of the charter school in a "non-challenged" school district would likely result in a student population that was whiter and wealthier than the population described in the application.

Forward Face of the Cincinnati Classical Charter Academy

The forward face of a charter school is its website. From a school's website, parents glean its philosophy and culture. What is featured on CCA's website provides insight into the families the school wishes to attract. The applicant claims it seeks a "diverse student population, including student's [sic] representative of urban intergenerational poverty and those experiencing social and economic deprivation during childhood and adolescence."

The CCA website, however, describes the school as providing "a tuition-free, classical liberal arts education" in "partnership with Hillsdale College," a private Christian college, with no forward mention that the school is a charter school. The featured slide deck zooms in on the Christian cross on the school building. Although there is information on the school's catered lunch program, it does not mention any provision for free or reduced-price lunches. Nowhere on the website does the school provide information in Spanish or other languages or indicate that it is inviting either socio-economically or racially diverse students.

In pictures of classrooms and hallways, the student body shows few students of color and no faculty of color. An image of the gymnasium shows a crucifix displayed on the wall, which we have been advised violates the law and the terms of the grant. A review of the school's virtual tour features white students and a white faculty and administration.

Inaccuracies in the Application

Throughout the application, the applicant touts the first-year achievement results on state tests provided on page 759 of the application in Appendix G15. The applicant claims, "These results were achieved with

⁵ <https://www.census.gov/quickfacts/fact/table/readingcityohio/PST045222>

⁶ <https://censusreporter.org/profiles/06000US3906125802-evendale-village-hamilton-county-oh/>

⁷ <https://www.census.gov/quickfacts/cincinnati-city-ohio>

⁸ <https://www.cincyclassical.org/cincinnati-classical-academy-will-locate-in-reading/>

a diverse student population that evidences the appeal of the Hillsdale K-12 classical education model to families from diverse cultural and socioeconomic backgrounds,” a claim which is clearly an over-exaggeration.

The school’s proficiency rates on page 759 do not match those listed on the state website.⁹ For example, the Ohio Education Department lists CCA’s 6th grade proficiency for the 2022-23 year as 76.9% and mathematics as 43.4%. These same rates are included in the school’s annual report.

Yet, the application lists the rates of the same grade level as 92% and 70%, respectively. Inflated rates are given in the application for every grade level in the school.

While it is true the charter school’s proficiency rates exceed the state, that is hardly surprising given that nearly half of all Ohio public school students are economically disadvantaged compared to less than 17% of CCA.

To further make its case, it compares the school’s ratings to those of what it refers to as underperforming public schools in an underserved target area. It begins with the performance of the Cincinnati Public Schools and continues with schools in a five-mile radius. None of the schools listed in that five-mile radius are part of the Cincinnati Public School system. It should also be noted that the names of the schools it lists for the Reading School District are incorrect, and there are three, not four, schools in that district.

Conclusion

To be blunt, CCA is designed to attract an elite student body whose families seek a private school experience paid for by taxpayers. Its videos, website, and literature, which include showcasing the cross on the top of the building and a crucifix in the gymnasium, are designed to attract white Christian middle-class families from the diverse districts in the area.

The application does not report or explain its lack of diversity. Instead, it masquerades as an equity initiative. The application does not present a plan to become more diverse but instead funding to expand a grade level each year.

The Department reviewers never questioned why the school never included demographic information. Instead, reviewers parroted back what the applicant said as if it were fact. A simple visit to the school website would have revealed the school for what it is. The lack of fact-checking by reviewers solicited from the charter community has been an ongoing concern.

Therefore, we ask that the grant to CCA be terminated and, based on the false and misleading information that the school provided, that all money be returned to the Department and no further money be disbursed.

Respectfully submitted,

The Network for Public Education

Greg Landsman, Ohio Congressional District 1

⁹ <https://reportcard.education.ohio.gov/school/achievement/019530>

Catherine Ingram, Ohio Senator District 9

Dani Isaacsohn, Ohio State Representative District 24

Cecil Thomas, Ohio Representative District 25

Sedrick Denson, Ohio State Representative District 26

Rachel Baker, Ohio State Representative District 27

Jessica Miranda, Ohio State Representative District 28

Ohio PTA

Ohio Education Association

Ohio Federation of Teachers

Cincinnati NAACP

Cincinnati Federation of Teachers

Cincinnati Mennonite Fellowship

Bold New Democracy

Child Wellness Fund, Inc.

Cleveland Heights Teachers Union

Erase the Space

Heights Coalition for Public Education

Honesty for Ohio Education

Northeast Democratic Club

Northeast Ohio Friends of Public Education

Ohio Coalition for Equity and Adequacy of School Funding

Public Education Partners- Ohio

Renaissance Services

Showing Up for Racial Justice (SURJ) Cincinnati

TransOhio

UnderWorld Black Arts Festival