



Charter School Authorizer Evaluation Report
Metro Nashville Public Schools
2022

Charter School Authorizer Evaluation 2022

Authorizer: Metro Nashville Public Schools

About the Charter School Authorizer Evaluations

In 2019, the General Assembly charged the State Board of Education (“State Board”) with conducting periodic evaluations of authorizers to determine authorizer compliance and evaluate quality. Tennessee is the fourth (4th) state in the U.S. to implement authorizer evaluations. The State Board partnered with SchoolWorks, an education consulting group with experience in authorizer evaluations, to develop an evaluation system based on State Board [Policy 6.111 – Quality Charter Authorizing Standards](#).

As part of the development process, the State Board gathered feedback from operators, authorizers, and charter school stakeholders on its Quality Charter Authorizing Standards, conducted focus groups to review feedback, connected with the three (3) other states that had an established authorizer evaluation system, and established a task force that included authorizers and operators to share in the development of the evaluation process. In addition, the State Board implemented a pilot evaluation with two (2) authorizers participating voluntarily in Fall 2020. The pilot served as a valuable step to prepare the State Board and Tennessee authorizers for its high-stakes authorizer evaluations.

Upon the conclusion of the pilot evaluation, the State Board finalized its [Rule 0520-14-01-.08](#) and [Policy 6.113](#) on charter school authorizer evaluations and began implementing the evaluation process in Fall 2021. The State Board believes that quality authorizing leads to quality charter schools and increased educational opportunities for students, which is the goal of the authorizer evaluations.

Evaluation Schedule

Authorizers are assigned to an evaluation cohort (see Table 1) and undergo an evaluation at least biennially. If an authorizer receives an Exemplary rating for two (2) consecutive evaluations, the authorizer is exempted from undergoing an evaluation during the next evaluation year. If an authorizer receives an Unsatisfactory/Incomplete rating during an evaluation, the authorizer is required to participate in another authorizer evaluation in the school year immediately following the Unsatisfactory/Incomplete rating. An exemption or required additional evaluation does not change an authorizer’s assigned evaluation cohort.

Table 1. Cohort Evaluation Schedule

Cohort	Authorizers
Cohort 1	<ul style="list-style-type: none"> ○ Hamilton County Schools ○ Knox County Schools ○ Shelby County Schools
Cohort 2	<ul style="list-style-type: none"> ○ Achievement School District ○ Metro Nashville Public Schools ○ Tennessee Public Charter School Commission

Evaluation Process

The evaluation is based on the twenty-four (24) standards within State Board [Policy 6.111 – Quality Charter Authorizing Standards](#). The standards are organized into six (6) categories: Agency Commitment and Capacity; Application Process and Decision Making; Performance Contracting; Ongoing Oversight and Evaluation; Revocation and Renewal Decision Making; and Advanced Standards. The authorizer’s overall rating is based on the evaluation team’s consideration of standards, with the Advanced Standards category providing the opportunity for bonus points.

Characteristics of the Process

- Each authorizer is evaluated by an evaluation team with experience in charter school authorizing. The State Board also enlists the support of a quality editor responsible for analyzing and verifying the evidence and ratings for each standard and ensuring consistency across evaluations.
- Evaluations focus on a two (2) year review term¹ and are limited to the review of the following: documents submitted by the authorizer (including corresponding documentation for randomly selected schools for each evaluation standard), an interview with school leaders from the authorizer’s portfolio of schools, and a documentation debrief with the authorizer. The State Board also considers findings and recommendation reports and final decisions for any appeals that occurred within the two (2) year review term, as applicable.
- The evaluation team objectively evaluates the evidence by comparing it against a rubric to determine which performance level best represents the authorizer’s practice. Each sub-standard is assigned a rating of zero (0) through four (4), as represented in Table 2, and each standard receives a rating representing the average of its sub-standards.
- The final product of each evaluation is a completed Authorizer Evaluation Report which includes final scores and evaluative comments for each sub-standard of the rubric, an overall evaluation rating (see Table 3), and any required follow-up actions.
- Evaluative comments are provided to describe the nature of the documented evidence in relation to each sub-standard of the rubric and relevant feedback for the authorizer. Comments also note cases in which the authorizer did not provide relevant documents.
- While the State Board developed its evaluation process to ensure it is fair and consistent across authorizers, evaluation of the twenty-four (24) rubric standards are conducted solely by the evaluation team and represent an independent evaluation of the authorizer’s practices in relation to the standards in the rubric.
- In accordance with State Board Rule 0520-14-01-.08, the final Authorizer Evaluation Report will be presented to the State Board for approval at the meeting following release of the final Authorizer Evaluation Report to the authorizer.

Table 2. Standard Ratings

0	1	2	3	4
Verbal Evidence and/or Documentation DOES NOT Address <u>or</u> Satisfy the Standard	Verbal Evidence and/or Documentation Addresses <u>and</u> Satisfies LESS THAN 50% of the Standard	Documentation Addresses MOST <u>but</u> Satisfies LESS THAN 50% of the Standard	Documentation Addresses <u>and</u> Satisfies MOST of the Standard	Documentation Addresses <u>and</u> Satisfies ALL of the Standard

Table 3. Overall Ratings

Score	Rating
3.50 – 4.00	Exemplary
3.00 – 3.49	Commendable
2.00 – 2.99	Satisfactory
1.00 – 1.99	Approaching Satisfactory
0 – 0.99	Unsatisfactory/Incomplete

¹ The review term for this evaluation includes documentation from September 1, 2020 through August 31, 2022.

Executive Summary

General Information	
Authorizer:	Metro Nashville Public Schools (“MNPS”)
About the Authorizer:	MNPS is a district authorizer in Davidson County. MNPS’s first charter school opened in 2007 and its charter schools currently serve approximately 17% of the district’s students.
# Operational Schools: # Students Enrolled:	27 schools in the 2021-22 school year 13,014 students in the 2021-22 school year
# Approved School(s) in Development: (name and planned opening year)	1 school in development <ul style="list-style-type: none"> Nashville Classical West (opening in 2023)
Closed Schools: (name and year closed)	2 schools closed since September 1, 2020 <ul style="list-style-type: none"> Knowledge Academies (closed 2022) Knowledge Academy High School (closed 2022)
Evaluation Summary	
Identified Areas of Strength	
<ul style="list-style-type: none"> The authorizer implements a charter application process that is aligned with state guidelines, allows sufficient time for each stage of the process, and follows a rigorous process that includes a thorough review of the application and a capacity interview with each applicant. The authorizer provides technical guidance to schools through on-going exceptional education support, optional professional development opportunities, and an annual charter school meeting at the start of the school year. The authorizer’s charter agreement outlines the material and non-material terms and allows charter schools to amend the material terms of the agreement through an amendment application process. 	
Identified Areas for Growth	
<ul style="list-style-type: none"> The authorizer lacks a comprehensive performance accountability and compliance monitoring system that is defined in policy, clearly communicated to schools, aligned to its charter agreement, and provides key outcomes to inform renewal, revocation, and intervention decisions. When a performance deficiency is identified, the authorizer implements an informal intervention process that is not aligned to the intervention process stated in its handbook, is not clearly communicated to schools, and does not clearly engage in strategies that preserve school autonomy while stating possible consequences for noncompliance. The authorizer has not established or communicated the criteria needed for renewal and inconsistently provides schools with a cumulative report summarizing their performance over their charter term, as required by law. 	
Required Follow Up Actions	
<ul style="list-style-type: none"> Submission of a self-assessment in the 2023-24 school year, as required for all authorizers in a non-evaluation year. 	

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Overall Ratings Summary

Standard		Rating (0-4)	Standard Average
1a	Planning and Commitment to Excellence	2.4	1.9
1b	Human Resources	1	
1c	Financial Resources	2.5	
2a	Application Proposal Information, Questions, and Guidance	3.1	3.1
2b	Fair, Transparent, Quality-Focused Procedures	2.8	
2c	Rigorous Approval Criteria	4	
2d	Rigorous Decision Making	1.6	
2e	Elements for Existing School Operators or Replicators (if applicable)	4	
2f	Elements for Applicants Proposing to Contract with Educational Service Providers, including Charter Management Organizations (if applicable)	N/A	
3a	Charter Agreement Term, Negotiation, and Execution	2.8	2.4
3b	Rights and Responsibilities	2.5	
3c	Performance Standards	2	
3d	Provisions for Educational Service Provider (ESP) Contracts (if applicable)	N/A	
3e	ESP Contracts Additional Provisions.	N/A	
4a	Performance Evaluation and Compliance Monitoring	2.1	1.7
4b	Respecting School Autonomy	2.3	
4c	Protecting Student Rights	2	
4d	School Intervention	1.4	
4e	Public Reporting	1	
5a	Revocation	3	1.7
5b	Renewal Decisions Based on Merit and Inclusive Evidence	1.3	
5c	Cumulative Report and Renewal Application	1.5	
5d	Fair, Transparent Process	0.8	
5e	Closure	2	
6	Advanced Standard (Bonus)	1	1
Overall Rating		2.2 Satisfactory	

Standard 1a - Planning and Commitment to Excellence	0	1	2	3	4
Sub-standards					
i. Supports and advances the purposes of charter school law.			2		
ii. Ensures that the authorizer’s local board of education or authorizing board, leadership, and staff understand and are committed to the quality charter authorizing principles and standards and developing as authorizing professionals.		1			
iii. Defines external relationships and lines of authority to protect its authorizing functions from conflicts of interest and political influence.			2		
iv. Implements policies, processes, and practices that streamline and systematize its work toward stated goals and executes its duties efficiently while minimizing administrative burdens on schools.			2		
v. Evaluates its work regularly against national and state standards for quality authorizing and recognized effective practices and develops and implements timely plans for improvement when necessary.				3	
vi. States a clear mission for quality authorizing.					4
vii. Makes authorizing decisions that will result in positive student outcomes, in accordance with state law.				3	
Standard Rating					2.4

Evaluative Comments:	
i.	The charter school authorization handbook and charter school resource handbook demonstrate how the authorizer supports five (5) of the six (6) purposes in charter school law; however, the documentation does not include evidence of affording parents meaningful opportunities to participate in the education of their children. Additionally, the documentation does not demonstrate advancing any of the purposes ² .
ii.	While the narrative form states that the authorizer provides training on authorizing topics during board retreats and a screenshot of an invitation to attend a professional development session about the charter application process was provided, the documentation does not include evidence of any professional development completed by its board of education, district leadership, or staff to ensure understanding of and a commitment to the quality authorizing standards and development as authorizing professionals.

² Tennessee Code Annotated (T.C.A). § 49-13-102 states the six (6) purposes of a charter school: improve learning for all students and close the achievement gap between high and low students; provide options for parents to meet educational needs of students; encourage the use of different and innovative teaching methods, and provide greater decision making authority to schools and teachers in exchange for greater responsibility for student performance; measure performance of pupils and faculty, and ensure that children have the opportunity to reach proficiency on state academic assessments; create new professional opportunities for teachers; and afford parents substantial meaningful opportunities to participate in the education of their children.

- iii. While the narrative form states that the authorizer implements all processes outlined in its charter school authorization handbook with fidelity and a blank conflict of interest questionnaire and organizational chart were provided, the documentation does not include a conflict-of-interest policy or signed statements from members of the authorizing office or local board of education to ensure its functions are protected from conflicts of interest and political influence.
- iv. While the charter school resource handbook outlines the authorizing office's purposes (e.g., recommend authorization of highly effective charter school applicants, support the work of existing charter schools, etc.) and the charter school authorization handbook includes procedures for implementing some of its authorizing responsibilities (e.g., processes for new start applications, renewal applications, contract amendments, and closures), the purposes are a list of authorizing responsibilities rather than measurable goals. Additionally, the handbooks are not comprehensive, and the authorizer implements practices not included within the handbook, which creates administrative burdens for its schools.
- v. While the documentation included a self-assessment from 2021 and the authorizer's completion of the narrative form as part of the evaluation demonstrates the authorizer evaluates its work against standards for quality authorizing, the documentation does not include evidence of the authorizer's development or implementation of a plan for improvement based on the outcomes of its self-assessments.
- vi. As documented in the charter school resource handbook, the authorizer's mission is to "Authorize excellent public schools that change lives."
- vii. Documentation related to the two (2) selected new charter applications and two (2) selected renewal applications demonstrate evidence-based application reviews; however, in review of the authorizer's complete appeal history during the review term, the authorizer's decision to deny three (3) charter school applications and three (3) charter amendment applications were overturned by the state agency responsible for hearing appeals.

Standard 1b - Human Resources		0	1	2	3	4
Sub-standards						
i.	Through intra- or inter-agency collaborations, contractual relationships and/or staff, enlists expertise and competent leadership for all areas essential to charter school oversight—including, but not limited to, education leadership; instruction; assessment; local community needs; special education, English learners, and other diverse learning needs; performance management and accountability; law; finance; facilities; and nonprofit governance and management.		1			
ii.	Employs competent personnel at a staffing level appropriate and sufficient to carry out all authorizing responsibilities in accordance with national and state standards, and commensurate with the scale of the charter school portfolio.		1			
iii.	Demonstrates an on-going commitment to developing and retaining authorizing staff members and provides regular professional development for the agency's leadership and local board of education or authorizing board to achieve and maintain high standards of professional authorizing practice and to enable continual agency improvement.		1			
Standard Rating						1
Evaluative Comments:						
i.	While some job descriptions were provided, the documentation does not include staff resumes or similar documentation to demonstrate the authorizer enlists expertise and competent leadership in all areas of charter school oversight.					
ii.	While the charter school resource handbook shows an organizational chart that demonstrates a staffing level appropriate with the scale of the portfolio (i.e., 6 fully funded staff, 2 partially funded staff, and 4 additional support staff for a portfolio of 26 schools), there is conflicting information documented in the narrative form and at least one (1) vacancy among the team. Additionally, the documentation only included four (4) job descriptions for the team of 12; therefore, it cannot be discerned if all authorizing responsibilities are fulfilled.					
iii.	While the documentation included evidence of team meetings and an invitation to attend a professional development session, the meeting agendas do not include evidence of professional development and it cannot be ascertained if staff attended the professional development session based on the invitation alone. The documentation does not include any further evidence of providing training for its leadership, the local board of education, or staff to demonstrate an on-going commitment to developing and retaining staff or to achieving and maintaining high standards of professional authorizing practice.					

Standard 1c - Financial Resources		0	1	2	3	4
Sub-standards						
i.	Determines the financial needs of the authorizing office and devotes financial resources to fulfill its authorizing responsibilities in accordance with national and state standards, commensurate with the scale of the charter school portfolio, and in accordance with Tennessee statute, including all relevant requirements for use of the authorizer fee.			2		
ii.	Structures its funding in a manner that avoids conflicts of interest, inducements, incentives, or disincentives that might compromise its judgment in charter approval and accountability decision making.					4
iii.	Deploys funds effectively, transparently, and efficiently with the public and student interests in mind.			2		
iv.	Annually reports the authorizing obligations fulfilled using the authorizer fee in accordance with state law.			2		
Standard Rating						2.5

Evaluative Comments:	
i.	While the 2020-21 authorizer fee report includes descriptions for its use of funds (e.g., personnel responsibilities, building maintenance, EL supports), the report does not include the amount collected from each of its schools, and a fee report from 2019-20 was not provided. Additionally, neither an authorizing budget nor other supporting documentation was provided to further reveal financial resources or provide documentation of covering the remaining \$38,754.50 authorizing expenses during the 2020-21 school year.
ii.	There is no evidence of a conflict of interest relevant to the authorizer’s funding structures.
iii.	While the 2020-21 authorizer fee report demonstrates effective use of funds, the documentation does not include evidence of transparency, such as posting the authorizer fee report on the authorizer’s website or sharing the report with its charter schools. Additionally, the documentation does not include evidence of a clear process for spending the funds efficiently.
iv.	While the 2020-21 authorizer fee report documents the obligations fulfilled by the authorizer fee, the report does not include all required components from the state’s fee report template, and the 2019-20 authorizer fee report was not provided.

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Standard 2a - Proposal Information, Questions, and Guidance		0	1	2	3	4
Sub-standards						
i.	Issues a charter application information packet or request for proposals (RFP) that: a) States any chartering priorities the authorizer may have established; b) Articulates comprehensive application questions to elicit the information needed for rigorous evaluation of applicants' plans and capacities; and c) Provides clear guidance and requirements regarding application content and format, while explaining evaluation criteria.			2		
ii.	Welcomes proposals from first-time charter applicants as well as existing school operators/replicators, while appropriately distinguishing between the two kinds of applicants in proposal requirements and evaluation criteria.				3	
iii.	Encourages expansion of charter schools that demonstrate academic success, financial viability, organizational health, and capacity for growth.				3	
iv.	Encourages replication of charter schools that demonstrate academic success, financial viability, organizational health, and capacity for growth.				3	
v.	Considers diverse educational philosophies and approaches.					4
vi.	Requires applicants to demonstrate capacity to serve students with diverse needs, such as students with disabilities or learning exceptionalities and English learners.					4
Standard Rating						3.1
Evaluative Comments:						
i.	The charter school authorization handbook provides guidance for the application process and application materials for the selected schools demonstrates use of the state's charter school application and scoring rubric, as required. However, while the narrative states five (5) criteria for new school proposals (e.g., advance academic achievement for students, demonstrate a strong record of success in improving academic achievement for English language learners), the criteria are not included in the handbook or other documentation. Additionally, the documentation does not include evidence of issuing the handbook or other guidance to prospective applicants, such as through posting the handbook on the authorizer's website.					
ii.	While use of the state's required charter school application sets the requirements for first-time and existing operator applicants, there is no evidence of the authorizer welcoming proposals, such as by sharing the application, its charter school authorization handbook, or a guidance document via its website or with prospective applicants.					

- iii. While the state's required charter school application includes questions specific to operators applying to expand, the documentation does not include evidence of encouraging expansion, such as direct communication with its schools regarding the process or other public-facing actions promoting the expansion of charter schools.
- iv. While the state's required charter school application includes questions specific to operators applying to replicate an existing school, the documentation does not include evidence of encouraging replication, such as direct communication with high-performing charter schools in or outside of the district.
- v. The state's required charter school application contains questions related to characteristics of the academic program and educational philosophy without prescribing a particular approach. The state's required scoring rubric contains criteria related to a research-based academic plan that aligns to the target population and mission, without prescribing the approach.
- vi. Through use of the state's required charter school application and scoring rubric as well as the authorizer's inclusion of a capacity interview during the application process, the authorizer requires applicants to demonstrate capacity to serve students with diverse needs.

Standard 2b - Fair, Transparent, Quality-Focused Procedures		0	1	2	3	4
Sub-standards						
i.	Implements a charter application process that is open, well-publicized, and transparent, and is organized around clear, realistic timelines.			2		
ii.	Allows sufficient time for each stage of the application and school pre-opening process to be carried out with quality and integrity.					4
iii.	Explains how each stage of the application process is conducted and evaluated.					4
iv.	Communicates the education needs of the district, the charter authorizing processes, approval criteria, and decisions clearly to the public.			2		
v.	Informs applicants of their rights and responsibilities and promptly notifies applicants of approval or denial, while explaining the factors that determined the decision so that applicants can decide if they wish to revise their plans based in part on that information and resubmit in the future.			2		
Standard Rating						2.8
Evaluative Comments:						
i.	While the charter school authorization handbook outlines an application process with timelines and relevant details, the documentation does not include evidence of an open, well-publicized, and transparent process (e.g., posting to the district’s website, communicating with potential applicants) beyond the authorizer’s use of the state’s charter school application, as required.					
ii.	The authorizer follows the required state application timeline, as made evident in the charter school authorization handbook, and provides a more detailed timeline for each step of its process, including exact dates for capacity interviews and local school board votes on the initial and amended applications.					
iii.	The charter school authorization handbook and the state’s required charter school application and scoring rubric include explanations for each stage of the application process.					
iv.	While the charter school authorization handbook outlines its authorizing purposes and process and the authorizer utilizes the state’s scoring rubric to document the approval criteria, as required, the documentation does not include evidence of communicating the needs of the district or application decisions with the public.					
v.	While the charter school authorization handbook includes specific dates for decision-making, the documentation for the selected schools does not include evidence of informing applicants of their rights or notifying them of approval or denial decisions while explaining factors that led to the decision.					

Standard 2c - Rigorous Approval Criteria		0	1	2	3	4
Sub-standards						
i.	Requires all applicants to present a clear and compelling mission, a quality educational program, a demonstration of community support, a solvent and sustainable budget and contingency financial plans, a clear demonstration of the effectiveness of the model for the target student population, effective governance and management structures and systems, founding team members demonstrating diverse and necessary capabilities in all phases of the school's development, and clear evidence of the applicant's capacity to execute its plan successfully.					4
ii.	Establishes distinct requirements and criteria for applicants who are existing school operators or replicators.					4
iii.	Establishes distinct requirements and criteria for applicants proposing to contract with educational service providers (ESPs), including charter management organizations.					4
Standard Rating						4
Evaluative Comments:						
i.	The authorizer's use of the state's charter school application and scoring rubric, as required, make evident each of the applicant requirements cited in this sub-standard. Additionally, the capacity interview notes for the selected schools A. and B. for this standard demonstrate how the authorizer ensures applicants have the capacity to execute their plans successfully.					
ii.	The state's required charter school application includes questions for existing school operators or replicators, as outlined on page 5 of the applications for the selected schools, and the state's scoring rubric establishes the criteria for approval.					
iii.	The state's required charter school application contains questions for applicants proposing to contract with educational service providers, and the state's scoring rubric establishes the criteria for approval.					

Standard 2d - Rigorous Decision Making	0	1	2	3	4
Sub-standards					
i. Grants charters only to applicants that have demonstrated competence and capacity to succeed in all aspects of their particular charter school model, consistent with the stated approval criteria.			2		
ii. Rigorously evaluates each application through thorough review of the written proposal, a substantive in-person interview with each qualified applicant, and all appropriate due diligence to examine the applicant's experience and capacity, conducted by knowledgeable and competent evaluators.				3	
iii. Engages, for both written application reviews and applicant interviews, highly competent teams of internal and external evaluators with relevant educational, organizational (governance and management), financial, and legal expertise, as well as thorough understanding of the essential principles of charter school autonomy and accountability.			2		
iv. Provides orientation or training to application evaluators (including interviewers) to ensure consistent evaluation standards and practices, the elimination of real or perceived conflicts of interest, the observance of essential protocols, and the fair, unbiased treatment of all applicants.			2		
v. Ensures that the application-review process and decision making are free of conflicts of interest, and requires full disclosure of any potential or perceived conflicts of interest between reviewers or decision makers and applicants.		1			
vi. Approves applications that are comprised of a detailed plan for charter school opening, operation, and fiscal stability, with little substantive work left for later development.		1			
Standard Rating					1.6

Evaluative Comments:	
i.	While the documentation includes application review committee reports and findings presentation materials consistent with the approval criteria of the state's scoring rubric for selected schools A. and B., there is no documented evidence of a review committee's recommendation or the board's decision to approve or deny the applications. Additionally, upon review of the authorizer's full appeal history during the review term, three (3) charter school application decisions were overturned by the state agency responsible for hearing appeals.
ii.	The authorizer's charter school authorization handbook defines the rigorous application process, and the findings reports and capacity interview notes for selected schools A. and B. demonstrate the authorizer's evaluation of the applicants' written proposal and interview by an evaluation team. However, the documentation does not make evident the authorizer's use of due diligence when evaluating an application.

- iii. The charter school authorization handbook and review committee reports include a list of relevant divisions within the district office and an “external reviewer” as the review team. However, the documentation does not include names, resumes or biographies to determine expertise and an understanding of the essential principles of charter school autonomy and accountability.
- iv. The authorizer’s charter review team training demonstrates that the authorizer provides application training to its evaluators, which addresses essential protocols, unbiased treatment of applicants, and conflicts of interest. However, the documentation does not include evidence of consistent evaluation of standards, such as through examples or practice with sample materials, or addressing conflicts of interest as part of the training.
- v. While the documentation includes a blank conflict-of-interest questionnaire, the documentation does not include a list of reviewers or executed copies of the form for any reviewers or decision makers assigned to the application review of selected schools A. and B.
- vi. While the documentation includes application review committee reports and findings presentation materials which provide an evaluation of the application’s plan for opening, operation, and fiscal stability for selected schools A. and B., the review committee reports have tracked comments, which suggests they may not be a final version, and the reports do not include any final recommendations from the review committee. Additionally, there is no documented evidence of the board’s decision to approve or deny the amended applications.

Standard 2e - Elements for Existing School Operators or Applications (if applicable)		0	1	2	3	4
Sub-standards						
i.	Provide clear evidence of their capacity to operate new schools successfully while maintaining quality in existing schools;					4
ii.	Document their educational, organizational, and financial performance records based on all existing schools;					4
iii.	Explain any never-opened, terminated, or non-renewed schools (including terminated or non-renewed third-party contracts to operate schools);					4
iv.	Present their growth plan, business plan, and most recent financial audits;					4
v.	Meet high standards of academic, organizational, and financial success to earn approval for replication; and	N/A				
vi.	Document any current or past litigation and the resolution of such litigation.					4
Standard Rating						4

Evaluative Comments:	
i.	As documented in the application for selected school A., the authorizer required the existing operator to complete section 2.12 which requests evidence of the sponsor's capacity to operate new schools while maintaining quality in its existing schools. The sponsor for selected school B. was not an existing operator and therefore section 2.12 was not required.
ii.	As documented in the application for selected school A., the authorizer required the sponsor to complete section 4, which requests documentation of an existing operator's education, organizational, and financial performance of its open and operating schools. The sponsor for selected school B. was not an existing operator and therefore section 4 was not required.
iii.	As documented in the application for selected school A., the authorizer required the sponsor to complete sections 2.11 and 4 of the state's charter school application, which requires existing operators to explain any never opened, terminated, or nonrenewed schools. The sponsor for selected school B. was not an existing operator and therefore these sections were not required.
iv.	As documented in the application for selected school A., the sponsor completed sections 2.11, 3, and 4 of the state's charter school application, which requires existing operators to present a growth plan, business plan, and recent financial audits. The sponsor for selected school B. was not an existing operator and therefore these sections were not required.
v.	N/A – Neither of the selected schools applied to replicate an existing school.
vi.	As documented in the application for selected school A., the sponsor was required to document any current or past litigation and resolution in section 4. The sponsor for selected school B. was not an existing operator and therefore section 4 was not required.

Standard 2f - Elements for Applicants Proposing to Contract with Educational Service Providers, including Charter Management Organizations (if applicable)		0	1	2	3	4
Sub-standards						
i.	Evidence of the service provider’s educational and management success;			N/A		
ii.	A description of the process for selecting the ESP;			N/A		
iii.	A draft (or existing) service/management contract that sets forth proposed key terms, including roles and responsibilities of the school governing board, the school staff, and the service provider; the services and resources to be provided; performance-evaluation measures and mechanisms; detailed explanation of compensation to be paid to the provider; financial controls and oversight; investment disclosure; methods of contract oversight and enforcement; and conditions for contract renewal and termination; and			N/A		
iv.	Disclosure and explanation of any existing or potential conflicts of interest between the school governing board and proposed service provider or any affiliated business entities.			N/A		
Standard Rating						N/A
Evaluative Comments:						
N/A - The selected schools for this standard did not propose to contract with an educational service provider.						

Standard 3a - Charter Agreement Term, Negotiation, and Execution		0	1	2	3	4
Sub-standards						
i.	Executes a charter agreement with a legally incorporated governing board independent of the authorizer.				3	
ii.	Grants charter agreements for an initial term of ten operating years with a high-stakes review every five years, in addition to annual performance reports.				3	
iii.	Defines material and non-material terms of the charter agreement.				3	
iv.	Ensures mutual understanding and acceptance of the terms of the charter agreement by the school's governing board.			2		
v.	Allows—and requires charter agreement amendments for—occasional material changes to a school's plans but does not require amending the charter agreement for non-material modifications.				3	
Standard Rating						2.8

Evaluative Comments:	
i.	While the authorizer submitted the two (2) required charter agreements for review, the charter agreement for selected school D. is not the most current agreement as the school has been renewed during the review term and therefore requires a new agreement or documentation evidencing renewal of the original agreement. As a result, only the documentation for selected school C. was evaluated for this sub-standard. The charter agreement for selected school C. explicitly names the incorporated governing board and the authorizer in the first paragraph of the contract.
ii.	While the authorizer submitted the two (2) required charter agreements for review, the charter agreement for selected school D. is not the most current agreement as the school has been renewed during the review term and therefore requires a new agreement. As a result, only the documentation for selected school C. was evaluated for this sub-standard. According to the charter agreement for selected school C., the operating term is stated in section 1.2 with annual performance reports and an interim review stated in section 1.6 of the agreement.
iii.	While the authorizer submitted the two (2) required charter agreements for review, the charter agreement for selected school D. is not the most current agreement as the school has been renewed during the review term and therefore requires a new agreement. As a result, only the documentation for selected school C. was evaluated for this sub-standard. The material and non-material terms are outlined in sections 2.2 and 10 of the charter agreement for selected school C. Though this did not impact the score, the State Board recommends amending the charter agreement to ensure that all material terms included in the TN Public Charter School Commission's amendment petition rule are stated in the charter agreement.
iv.	While the authorizer submitted the two (2) required charter agreements for review, the charter agreement for selected school D. is not the most current agreement as the school has been renewed during the review term and therefore requires a new agreement. As a result, only the documentation for selected school C. was evaluated for this sub-standard. The charter agreement for selected school C. demonstrates mutual

understanding and acceptance of the terms with the signatures of the authorizer's board chair and leadership as well as the school's CEO; however, a signature by the school's governing board was not included.

- v. While the authorizer submitted the two (2) required charter agreements for review, the charter agreement for selected school D. was not the most current agreement as the school has been renewed during the review term and therefore requires a new agreement. As a result, only the documentation for selected school C. was evaluated for this sub-standard. Section 10 of the charter agreement for selected school C. outlines the requirements for amending the charter agreement.

Standard 3b - Rights and Responsibilities		0	1	2	3	4
Sub-standards						
i.	Executes charter agreements that clearly: <ul style="list-style-type: none"> a. State the rights and responsibilities of the school and the authorizer; b. State and respect the autonomies to which schools are entitled—based on statute, waiver, or authorizer policy—including those relating to the school’s authority over educational programming, staffing, budgeting, and scheduling; c. Define performance standards, criteria, and conditions for renewal, intervention, revocation, and non-renewal, while establishing the consequences for meeting or not meeting standards or conditions; d. State the statutory, regulatory, and procedural terms and conditions for the school’s operation; e. State reasonable pre-opening requirements or conditions for new schools to ensure that they meet all health, safety, and other legal requirements prior to opening and are prepared to open smoothly; f. State the responsibility and commitment of the school to adhere to essential public-education obligations, including admitting and serving all eligible students so long as space is available, and not expelling or counseling out students except pursuant to a legal discipline policy approved by the authorizer; and g. State the responsibilities of the school and the authorizer in the event of school closures. 			2		
ii.	Ensures that any fee-based services that the authorizer provides are set forth in a services agreement that respects charter school autonomy and treats the charter school equitably compared to district schools, if applicable; and ensures that purchasing such services is explicitly not a condition of charter approval, continuation, or renewal.				3	
Standard Rating						2.5

Evaluative Comments:

- i. While the authorizer submitted the two (2) required charter agreements for review, the charter agreement for selected school D. is not the most current agreement as the school has been renewed during the review term and therefore requires a new agreement. As a result, only the documentation for selected school C. was evaluated for this sub-standard. Though the charter agreement for selected school C. addresses some of the criteria for this sub-standard, the agreement does not state the autonomies to which schools are entitled; include the performance standards, criteria, and conditions for renewal and intervention; state the pre-opening requirements; or include the closing responsibilities of the authorizer and the charter school. The pre-opening workbook, referenced in the agreement as Exhibit 2, was not included.
- ii. While the authorizer submitted the two (2) required charter agreements for review, the charter agreement for selected school D. is not the most current agreement as the school has been renewed during the review term and therefore requires a new agreement. As a result, only the documentation for selected school C. was evaluated for this sub-standard. Section 9.2 of the charter agreement affirms that the parties may enter into separate fee-for-services agreements and that entering such agreements shall not be grounds for revocation or non-renewal, as required in State Board rule. The authorizer affirmed during the document debrief that there are no fee-based services provided by the authorizer to the charter schools currently.

Standard 3c - Performance Standards Sub-standards	0	1	2	3	4
i. Executes charter agreements that plainly: <ul style="list-style-type: none"> a. Establish the performance standards under which schools will be evaluated, using objective and verifiable measures of student achievement as the primary measure of school quality, in accordance with state law; b. Define clear, measurable, and attainable academic, financial, and organizational performance standards and targets that the school must meet as a condition of renewal, including but not limited to state and federal measures; c. Include expectations for appropriate access, education, support services, and outcomes for students with disabilities; d. Define the sources of academic data that will form the evidence base for ongoing and renewal evaluation, including state-mandated and other standardized assessments, student academic growth measures, internal assessments, qualitative reviews, and performance comparisons with other public schools in the district and state; e. Define the sources of financial data that will form the evidence base for ongoing and renewal evaluation, grounded in professional standards for sound financial operations and sustainability; f. Define the sources of organizational data that will form the evidence base for ongoing and renewal evaluation, focusing on fulfillment of legal obligations, fiduciary duties, and sound public stewardship; and g. Include clear, measurable performance standards to judge the effectiveness of alternative model schools, as defined by state law—requiring and appropriately weighting rigorous mission-specific performance measures and metrics that credibly demonstrate each school’s success in fulfilling its mission and serving its special population. 		1			
ii. Sets detailed performance standards. Performance standards enable schools and authorizers to know the outcomes for which authorizers will hold schools accountable. They are the basis for school evaluation and should be incorporated in the charter agreement, commonly as an attachment. Academic, financial, and organizational performance standards should include clearly defined and measurable indicators, measures, metrics, and targets that: <ul style="list-style-type: none"> a) Academic Performance <ul style="list-style-type: none"> 1. Set expectations for student academic achievement status or proficiency, including comparative proficiency; 				3	

<ul style="list-style-type: none"> 2. Set expectations for student academic growth, including adequacy of growth toward state standards; 3. Incorporate state and federal accountability systems, including state grading and/or rating systems; 4. Set expectations for postsecondary readiness, including graduation rates (for high schools); and 5. Provide schools an option to incorporate mission-specific performance measures for which the school has presented valid, reliable, and rigorous means of assessment approved by the authorizer. <p>b) Financial Performance</p> <ul style="list-style-type: none"> 1. Enable the authorizer to monitor and evaluate the school’s financial stability and viability based on short-term performance; and 2. Enable the authorizer to monitor and evaluate the school’s long-term financial sustainability. <p>c) Organizational Performance</p> <ul style="list-style-type: none"> 1. Define the essential elements of the educational program for which the authorizer will hold the school accountable; 2. Define financial management and oversight standards based on generally accepted accounting principles; 3. Hold school governing boards accountable for meeting statutory and board-established operating and reporting requirements; 4. Ensure school compliance with student and employee rights and obligations; and 5. Establish expectations related to the school environment, including health and safety, transportation, facilities, and appropriate handling of records. 					
Standard Rating					2

Evaluative Comments:

- i. While the authorizer submitted the two (2) required charter agreements for review, the charter agreement for selected school D. is not the most current agreement as the school has been renewed during the review term and therefore requires a new agreement. As a result, only the documentation for selected school C. was evaluated for this sub-standard. The charter agreement for selected school C. notes the performance framework as Exhibit 3, but it was not attached to the agreement; therefore, alignment with the requirements of this sub-standard could not be ascertained. Additionally, when discussed during the school leader interview, participants were uncertain if a performance framework currently exists.
- ii. While the authorizer submitted the two (2) required charter agreements for review, the charter agreement for selected school D. is not the most current agreement as the school has been renewed during the review term and therefore requires a new agreement. As a result, only the documentation for selected school C. was evaluated for this sub-standard. The charter agreement for selected school C. notes the performance framework as Exhibit 3, though it was not provided. However, the narrative explained that the authorizer utilizes the state's model performance framework to evaluate its schools, which meets the criteria of this sub-standard though additional documentation of the measures used to determine scores for each indicator on the framework was not provided.

Standard 3d - Provisions for Educational Service Provider (ESP) Within Charter Agreement (if applicable) Sub-standards	0	1	2	3	4
i. Includes, for any school that contracts with an ESP provider for the management of its educational program, finances, or school operations, contractual provisions that: ³ <ol style="list-style-type: none"> a. Clearly establish the primacy of the charter agreement over the ESP contract; b. Clearly identify the school governing board as the party ultimately responsible for the success or failure of the school, and clearly define the ESP as a vendor of services; c. Prohibit the ESP from selecting, approving, employing, compensating, or serving as school governing board members; d. Provide for sufficient transparency around the spending of public monies; and e. Require all instructional materials, furnishings, and equipment purchased or developed with public funds to be the property of the school, not the ESP, in compliance with state law. 	N/A				
Standard Rating					N/A
Evaluative Comments:					
N/A –Selected schools C. and D. do not contract with an ESP provider.					

³ The standard does not apply to contracts with ESPs that do not have substantial responsibility for education, operational, and financial operations such as for payroll, textbooks, curriculum, etc.

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Standard 3e - Provisions for ESP Contract		0	1	2	3	4
Sub-standards						
i.	The roles and responsibilities of the school governing board and the ESP, including all services to be provided under the contract;			N/A		
ii.	The performance measures, consequences, and mechanisms by which the school governing board will hold the ESP accountable for performance, aligned with the performance measures in the charter agreement;			N/A		
iii.	All compensation to be paid to the ESP including all fees, bonuses, and what such compensation includes or requires;			N/A		
iv.	Terms of any facility agreement that may be part of the relationship;			N/A		
v.	Financial reporting requirements and provisions for the school governing board's financial oversight;			N/A		
vi.	All other financial terms of the contract, including disclosure and documentation of all loans or investments by the ESP to the school, and provision for the disposition of assets in accordance with law;			N/A		
vii.	Assurances that the school governing board, at all times, maintains independent fiduciary oversight and authority over the school budget and ultimate responsibility for the school's performance;			N/A		
viii.	Provisions for contract termination; and			N/A		
ix.	Respective responsibilities of the governing board and ESP in the event of school closure, including transparency in the school's revenues and expenditures, as well as those managed by the ESP.			N/A		
Standard Rating						N/A
Evaluative Comments:						
N/A – Selected schools C. and D. do not contract with an ESP provider.						

Standard 4a - Performance Evaluation and Compliance Monitoring	0	1	2	3	4
Sub-standards					
i. Implements a comprehensive performance accountability and compliance monitoring system that is defined by the charter agreement and provides the information necessary to make rigorous and standards-based renewal, revocation, and intervention decisions.		1			
ii. Defines and communicates to schools the process, methods, and timing of gathering and reporting school performance and compliance data.			2		
iii. Implements an accountability system that effectively streamlines federal, state, and local performance expectations and compliance requirements while protecting schools' legally entitled autonomy and minimizing schools' administrative and reporting burdens.			2		
iv. Provides clear technical guidance to schools as needed to ensure timely compliance with applicable rules and regulations.					4
v. Visits each school as appropriate and necessary for collecting data that cannot be obtained otherwise and in accordance with the contract, while ensuring that the frequency, purposes, and methods of such visits respect school autonomy, minimize administrative burdens, and avoid operational interference.			2		
vi. Evaluates each school annually on its performance and progress toward meeting the standards and targets stated in the charter agreement, including essential compliance requirements, and clearly communicates evaluation results to the school's governing board and leadership.			2		
vii. Requires and reviews annual financial audits of schools, conducted by a qualified independent auditor.				3	
viii. Communicates regularly with schools as needed, including both the school leaders and governing boards, and provides timely notice of contract violations or performance deficiencies.			2		
ix. Provides an annual written report to each school, summarizing its performance and compliance to date and identifying areas of strength and areas needing improvement.		1			
x. Articulates and enforces stated consequences for failing to meet performance expectations or compliance requirements.			2		
Standard Rating					2.1

Evaluative Comments:

- i. The charter agreement for selected school E. states, “decisions by the chartering authority regarding renewal or revocation [...] shall be based upon applicable laws and rules, this agreement and/or the academic, organizational, and financial performance frameworks,” and the model performance framework sets forth the indicators for performance. While the 2020-21 annual report, support visit overview, and school improvement plans provide some evidence of the implementation of a performance accountability and compliance monitoring system, a comprehensive system that monitors all responsibilities named in the charter agreement (e.g., English learner and special education services, discipline, enrollment, licensed teachers) was not provided. Additionally, the documentation lacks evidence of how the authorizer’s current monitoring system informs its renewal, revocation, and intervention decisions. Furthermore, the charter agreement for selected school F. was not provided for review.
- ii. The charter school authorization handbook includes information for gathering some school performance data through its school visits, and the charter school resource handbook includes the process and timing for some compliance-related data collection (e.g., school visits, data entry, and annual calendar reporting); however, the documentation does not include evidence of defining or communicating the process, methods and timings for all performance and compliance data outlined in the performance framework.
- iii. While the weekly charter updates and charter school authorization handbook demonstrate ways in which the authorizer streamlines some compliance requirements, accountability systems for several federal, state, and local performance and compliance requirements aligned to the charter agreement were not included (see evaluative comment for sub-standard i.). Additionally, the support visit overview states that the authorizer conducts “weekly visits on Monday, Wednesday, and Friday of each week to each MNPS charter school,” though the charter school authorization handbook for 2022-23 revises this frequency to quarterly visits moving forward. The high frequency of visits and unclear systems for accountability create administrative and reporting burdens on schools.
- iv. The school improvement plan feedback for the selected schools E. and F., the weekly charter updates emails with professional development opportunities listed, and the exceptional education training materials demonstrate ways the authorizer provides technical guidance to its schools. Additionally, participants in the charter school leader interview shared that the exceptional education trainings and support received is of high quality and actionable.
- v. Based on the support visit overview document, the authorizer conducted school visits with a rotating focus (e.g., academic, non-academic, milestone meeting, end of year meeting) three (3) times per week during the 2021-22 school year and required schools to submit documentation prior to visits, which creates operational interference for schools. However, the charter school authorization handbook and annual charter school training session demonstrate a shift to quarterly school visits for the 2022-23 school year, though beyond a general purpose of each visit, no additional documentation, such as a protocol, evidence of communication with schools, or the method for data collection, was provided. Additionally, only the charter agreement for selected school E was received to confirm the visits are in accordance with the charter agreement.
- vi. While the 2020-21 annual report includes performance outcomes and progress toward meeting the standards for all schools, the 2019-20 annual report was not provided. Additionally, the documentation did not include evidence of communicating results to the schools’ governing board or leadership.
- vii. While the 2021 certified audits for the selected schools E. and F. and the financial framework outcomes included in the 2020-21 annual report demonstrate the authorizer requires and reviews its schools’ financial audits, the documentation does not include two years of audits or annual reports within the review term.
- viii. The weekly charter updates demonstrate regular communication with its schools and the charter school authorization handbook includes an intervention protocol with possible consequences for performance deficiencies. However, the documentation does not make evident regular

communication with governing boards or the timely notice of performance deficiencies, though the authorizer confirmed during the document debrief that it meets with schools when deficiencies are identified.

- ix. The 2020-21 annual report summarizes school performance and compliance to date; however, the 2019-20 annual report was not provided. Additionally, the documentation lacked evidence of active communication with its schools regarding the publication of the annual report.
- x. The charter school authorization handbook includes the intervention process, which is provided to schools during the annual charter school meeting, as confirmed in the document debrief. However, no further documentation was provided to demonstrate how the authorizer articulates and enforces stated consequences beyond the issuance of the authorization handbook at the annual meeting.

Standard 4b - Respecting School Autonomy		0	1	2	3	4
Sub-standards						
i.	Respects the school's authority over its day-to-day operations.				3	
ii.	Collects information from the school in a manner that minimizes administrative burdens on the school, while ensuring that performance and compliance information is collected with sufficient detail and timeliness to protect student and public interests.			2		
iii.	Periodically reviews compliance requirements and evaluates the potential to increase school autonomy based on flexibility in the law, streamlining requirements, demonstrated school performance, or other considerations.	0				
iv.	Refrains from directing or participating in educational decisions or choices that are appropriately within a school's purview under the charter law or contract.					4
Standard Rating						2.3

Evaluative Comments:	
i.	While the milestone meetings allow schools to develop their own improvement goals and the weekly charter updates and Exceptional Education support newsletters offer optional professional development sessions, participants shared several occasions when the school's authority over their day-to-day operations were infringed upon during the school leader interview. Additionally, the authorizer described an informal intervention process that assigns a plan to schools in non-emergency situations rather than allowing schools to develop their own.
ii.	The charter school authorization handbook and the charter school resource handbook include some collection information for compliance, such as an email address to submit annual calendars, a file-sharing platform for uploading documents, and specific timelines for the authorizer's application processes. Additionally, the weekly charter updates include some deadlines and reminders to streamline the information. However, school leaders explained that the weekly updates are not comprehensive, and several submission requests are sent without sufficient detail or timeliness, thus creating an administrative burden on the schools. Furthermore, there was no further evidence of information collection for several performance or compliance-related data, including student rights, staff credentialing, governance, health and safety, as measured by the performance framework to ensure its schools are protecting student and public interest.
iii.	Neither the narrative nor the documentation includes evidence of the authorizer periodically reviewing compliance requirements or evaluating the potential to increase school autonomy, such as collecting and responding to survey feedback from its charter schools.
iv.	The milestone meetings, weekly charter updates, and submitted charter agreements demonstrate evidence of the authorizer refraining from educational choices such as allowing school choice in determining its own goals and action steps, offering schools the choice to participate in the authorizer's summer camp offerings, and clearly defining decisions such as curriculum as the right of the school.

Standard 4c - Protecting Student Rights		0	1	2	3	4
Sub-standards						
i.	Ensures that schools admit students through a random selection process that is open to all students, is publicly verifiable, and does not establish undue barriers to application (such as mandatory information meetings, mandated volunteer service, or parent contracts) that exclude students as provided by federal, state, and local law.		1			
ii.	Ensures that schools provide equitable access and inclusive services to all students as required by applicable federal and state law, including, but not limited to, students with disabilities, English learners, homeless students, students in foster care, migrant students, and gifted students.			2		
iii.	Ensures clarity in the roles and responsibilities of all parties involved in serving students with disabilities.				3	
iv.	Ensures that schools' student discipline policies and actions are legal, fair, and equitable and that no student is suspended, expelled, or counseled out of a school outside of that process, and that schools have a clear process for addressing parent/ community grievances.			2		
Standard Rating						2

Evaluative Comments:	
i.	While all charter schools are included in the authorizer's enrollment application process, which is publicly available online (as demonstrated by a screenshot of the website), the documentation does not include evidence of ensuring its charter schools admit students through a random selection process that is open, publicly verifiable, and does not establish undue barriers to application, such as through collection of lottery certifications, a school policy audit, or handbook review.
ii.	The charter school agreement for selected school E. requires equitable access and inclusive services for special education, gifted, and English learners and the documentation includes professional development materials for special education and English learner support staff and deadlines for two (2) English learner reporting documents at the start of the school year. Additionally, the support visit overview, school improvement plans, and exceptional education session materials demonstrate the authorizer discusses subgroup data and provides trainings relevant to providing required services to students. However, the documentation does not include evidence of ensuring services for all students, including homeless, foster care, and migrant students.
iii.	Section 2.3.1 of the charter agreement for selected school E. outlines responsibilities of the authorizer (e.g., overseeing procedural compliance with federal and state law) and section 2.3.2 includes responsibilities of the charter school (e.g., being responsible for the provision of services following identification) in serving students with disabilities. Additionally, the exceptional education and English learner support documents

outline the roles of charter schools and authorizing staff for supporting students with disabilities. The charter agreement for selected school F. was not provided.

- iv. While the charter agreement for selected school E. addresses student discipline and the authorizer's performance framework includes indicators for evaluating a school's commitment to protecting student rights for due process, there is no further evidence of actual evaluation of the school's discipline policies or a parent/community grievance process, such as through evidence of a school policy review or collection of an attestation from the school.

Standard 4d - School Intervention		0	1	2	3	4
Sub-standards						
i.	Establishes and clearly communicates to schools at the outset an intervention and problem-solving policy that states the general conditions that may trigger intervention and the types of actions and consequences that may ensue.				3	
ii.	Gives schools clear, adequate, evidence-based, and timely notice of contract violations or performance deficiencies.		1			
iii.	Allows schools reasonable time and opportunity for remediation in non-emergency situations.		1			
iv.	Applies professional discretion when intervention is needed and considers context and a range of effective solutions.		1			
v.	Where intervention is needed, engages in intervention strategies that clearly preserve school autonomy and responsibility (identifying what the school must remedy without prescribing solutions) while clearly stating possible consequences for noncompliance.		1			
Standard Rating						1.4

Evaluative Comments:	
i.	The charter school authorization handbook includes an intervention protocol (referred to as “Procedures for Sub-Standard Performance of a Charter School”), which states the general conditions that may trigger corrective action, such as weak performance and repeated failure to submit required documents, and the types of actions (e.g., notice of concern, notice of probation) leading up to revocation. The handbook is provided to schools during the annual charter school meeting, as confirmed by school leaders. However, the documentation does not include evidence of this meeting occurring on an annual basis, as suggested.
ii.	While the authorizer described in the document debrief the steps it has taken to address issues of performance deficiencies (e.g., scoring “falls far below” on the performance framework), the steps do not align with the authorizer’s intervention protocol outlined in the charter school authorization handbook, and no further documentation was provided.
iii.	While the authorizer described an informal process that is used when deficiencies are identified that could allow reasonable time and opportunity for remediation in a non-emergency situation, the informal process was not included in the authorizer’s intervention protocol, and no additional documentation was provided; therefore, it could not be ascertained if the informal process aligns with the expectations of this sub-standard.
iv.	While the charter school authorization handbook states the authorizer “reserves the right to put schools at any status without going through the steps if more immediate actions are warranted,” documentation demonstrating the application of this discretion was not provided.
v.	While the charter school authorization handbook lays out a protocol for intervention, during the document debrief, the authorizer described practices it uses that exist outside of its protocol and are not clearly communicated with schools. Additionally, the documentation does not

include evidence of implementation for any intervention strategies, either formally or informally, and therefore alignment with the criteria of this sub-standard could not be determined.

Standard 4e - Public Reporting		0	1	2	3	4
Sub-standards						
i.	Produces an annual public report that provides clear, accurate performance data for the charter schools it oversees and reports on individual school and overall portfolio performance according to the framework set forth in the charter agreement in accordance with State law.		1			
Standard Rating						1
Evaluative Comments:						
i.	While the 2020-21 annual report demonstrates that the authorizer reports performance data for each of its charter schools, as required in the charter agreement for selected school E., the report does not include an assessment of the overall portfolio, there is no evidence that the report is publicly shared, and the charter agreement for selected school F was not provided. Additionally, the 2019-20 annual report was not submitted to demonstrate the requirement of annually reporting performance.					

Standard 5a - Revocation		0	1	2	3	4
Sub-standards						
i.	Revokes a charter during the charter term if there is clear evidence of extreme underperformance or violation of law or the public trust that imperils students or public funds, in accordance with state law.				3	
ii.	Does not make revocation decisions on the basis of political or community pressure.	N/A				
Standard Rating						3
Evaluative Comments:						
i.	While the charter school authorization handbook provides the reasons for revocation in accordance with state law, a full revocation policy or process, which clearly states the steps and responsibilities the authorizer takes when considering revocation, was not provided. Additionally, while this did not impact the evaluation rating, the State Board recommends aligning the reasons for revocation stated in the handbook with the exact language of state law.					
ii.	N/A – While the authorizer submitted documentation for a revocation, the revocation occurred in 2019, and the authorizer did not consider any revocations during the review term; therefore, this standard is N/A.					

Standard 5b - Renewal Decisions Based on Merit and Inclusive Evidence		0	1	2	3	4
Sub-standards						
i.	Bases the renewal process and renewal decisions on thorough analyses of a comprehensive body of objective evidence defined by the performance framework in the charter agreement.			2		
ii.	Grants renewal only to schools that have achieved the standards and targets stated in the charter agreement, are organizationally and fiscally viable, and have been faithful to the terms of the contract and applicable law.		1			
iii.	Does not make renewal decisions on the basis of political or community pressure or solely on promises of future improvement.		1			
Standard Rating						1.3
Evaluative Comments:						
i.	While the renewal applications, reports, and board presentation materials for selected schools H. and I. demonstrate a renewal process that is based on a comprehensive body of evidence, the charter agreements for the schools were not provided to confirm the standard for renewal. Additionally, while a charter agreement executed in 2022 for selected school I. implies that the renewal was approved, no evidence documenting the decision for either of the selected schools, such as board minutes or decision letters, was provided.					
ii.	The renewal report for selected school I. states the school met the standard in academic, financial, organizational, and future planning and the new charter agreement suggests that the renewal was granted. However, the renewal report for selected school H. states the school partially met the standard for academics and future planning and met the standard for operational stability and financial health, and no documentation demonstrating a renewal decision was provided. Additionally, the charter agreements for the two (2) selected schools were not provided to confirm the schools' standards and targets for renewal.					
iii.	The authorizer's narrative states that renewal decisions are free from community and political pressure. The renewal of selected school I. (as evidenced by a new charter agreement executed in 2022) aligns to the "meets standard" ratings documented in the school's renewal report. However, neither of the renewal reports for the two (2) selected schools include a recommendation from the review committee, and there is no evidence of a decision for selected school H. Additionally, the documentation did not include any board meeting minutes or similar documentation to determine if its renewal decisions were made absent of political or community pressure or on the promise of future improvement.					

Standard 5c - Cumulative Report and Renewal Application		0	1	2	3	4
Sub-standards						
i.	Provides to each school, in advance of the renewal decision, a cumulative performance report that: <ul style="list-style-type: none"> a. Summarizes the school’s performance record over the charter term; and b. States the authorizer’s summative findings concerning the school’s performance and its prospects for renewal. 		1			
ii.	Requires any school seeking renewal to apply for it through a renewal application, which provides the school a meaningful opportunity and reasonable time to respond to the cumulative report; to correct the record, if needed; and to present additional evidence regarding its performance.			2		
Standard Rating						1.5
Evaluative Comments:						
i.	While the charter school authorization handbook defines a renewal process that includes a cumulative performance report issued by the authorizer in Year 9 of a school’s contract, cumulative reports for the two (2) selected schools were not provided. Additionally, the evaluation team received inconsistent responses during the school leader interview when asked about receipt of the cumulative report, and multiple participants shared that they did not know the summative performance of their school before going into renewal.					
ii.	The renewal applications for the two (2) selected schools demonstrates that the authorizer ensures its schools utilize the state’s renewal application, as required, and the renewal application process and timeline is outlined in the charter school authorization handbook; however, the documentation does not include evidence of providing schools with meaningful opportunity and time to respond to a cumulative report.					

Standard 5d - Fair, Transparent Process		0	1	2	3	4
Sub-standards						
i.	Clearly communicates to schools the criteria for charter revocation, renewal, and non-renewal decisions that are consistent with the charter agreement, including any policy changes thereto.		1			
ii.	Promptly notifies each school of its renewal (or, if applicable, revocation) decision, including written explanation of the reasons for the decision.		1			
iii.	Promptly communicates renewal or revocation decisions to the school community and public within a time frame that allows parents and students to exercise choices for the upcoming school year.	0				
iv.	Explains in writing any available rights of legal or administrative appeal through which a school may challenge the authorizer's decision, including appeal to the Tennessee Public Charter School Commission.		1			
v.	Regularly updates and publishes the process for renewal decision making, including guidance regarding required content and format for renewal applications.		1			
Standard Rating						0.8

Evaluative Comments:

i.	While the charter school authorization handbook discusses revocation, renewal, and non-renewal, the documentation does not state the criteria for renewal or non-renewal and does not include clear communication regarding criteria through a policy/process document or as part of the performance framework. Additionally, the charter agreements for the two (2) selected schools were not provided to affirm consistency with the charter agreement, and, during the school leader interview, participants were unable to explain the criteria for renewal.
ii.	While the narrative states that charter schools receive communication after a renewal decision, the authorizer's documentation does not include evidence of notification of its renewal decisions for the two (2) selected schools.
iii.	Neither the authorizer's narrative nor its documentation included evidence of prompt communication to the school community or public following a renewal decision for the two (2) selected schools or mention of a process to ensure this communication occurs.
iv.	While the charter school authorization handbook states that a charter school may appeal the authorizer's decision to deny a renewal application, the handbook incorrectly names the State Board of Education rather than the Tennessee Public Charter School Commission as the state agency responsible for hearing renewal appeals. Additionally, the documentation does not include evidence of explaining in writing any available appeal rights to the two (2) selected schools.
v.	While the narrative explains that the authorizer communicates with its schools on any changes in policy or procedure, the documentation does not include evidence of updates to its renewal documents or to the decision-making process.

Standard 5e - Closure		0	1	2	3	4
Sub-standards						
i.	In the event of a school closure, oversees and works with the school governing board and leadership in carrying out a detailed closure protocol that ensures timely notification to parents; orderly transition of students and student records to new schools; and disposition of school funds, property, and assets in accordance with law.			2		
Standard Rating						2
Evaluative Comments:						
i.	While the charter school authorization handbook includes a closure protocol, which requires the creation and execution of a plan to ensure notification to parents; transition of students and records; and disposition of funds, property and assets, documentation for the closure of selected school J. was not provided to assess implementation.					

Standard 6 - Advanced Standards (Bonus)		0	1	2	3	4
Sub-standards						
i.	Ensures authorizing is visible, adequately resourced, and the people responsible for day-to-day authorizing functions have input over decision making.			2		
ii.	Articulates and implements an intentional strategic vision and plan for chartering, including clear priorities, goals, and time frames for achievement.		1			
iii.	Evaluates its work regularly against its chartering mission and strategic plan goals, and implements plans for improvement when falling short of its mission and strategic plan.		1			
iv.	Provides an annual public report on the authorizer's program and performance in meeting its strategic plan goals.		1			
v.	Broadly invites and solicits charter applications while publicizing the authorizer's strategic vision and chartering priorities, without restricting or refusing to review applications that propose to fulfill other goals.	0				
Standard Rating						1
Evaluative Comments:						
i.	Based on the outcomes of the relevant sub-standards to assess 6i, the authorizer addressed but did not satisfy all the selected sub-standards ⁴ .					
ii.	While the authorizer sets an authorizing mission and vision for the portfolio in the charter school resource handbook, the documentation does not include a strategic plan, goals, or any benchmarks and/or action steps with time frames for achievement.					
iii.	While the authorizer evaluated its work as part of this evaluation process and the documentation included a similar self-assessment from 2021, there is no evidence of evaluating its work against its own mission and strategic plan goals. Additionally, the documentation does not include plans for improvement when shortfalls are identified.					
iv.	While the 2020-21 annual report provides a public report on the authorizer's charter schools, the documentation does not include details about the authorizer's progress in meeting its strategic plan goals. Additionally, the 2019-20 annual report was not provided nor was there documented evidence that the annual reports are publicly shared.					
v.	There is no evidence of the authorizer inviting or soliciting charter applications, such as by posting the application materials and guidance documents to its website. Additionally, the documentation does not include evidence of publicizing its chartering priorities.					

⁴ The relevant sub-standards used to assess 6i include 1avi, 1avii, 1ci, 2bi, 2biv, 2di, 5aii, and 5bi.