



Charter School Authorizer Evaluation Report
TN Public Charter School Commission
2022

Charter School Authorizer Evaluation 2022

Authorizer: TN Public Charter School Commission

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 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:	Tennessee Public Charter School Commission (“Charter Commission”)
About the Authorizer:	The Charter Commission is a state agency established in 2019 by Public Chapter 219 of the 111th General Assembly (“PC 219”) to serve as the state’s charter school appellate body and authorizer for any charter school that it approves upon appeal. In accordance with PC 219, the Charter Commission began serving as the state’s appellate body on January 1, 2021, and all schools previously authorized by the State Board of Education transferred to the Charter Commission on July 1, 2021.
# Operational Schools: # Students Enrolled:	4 schools in the 2021-22 school year (increased to 9 schools in the 2022-23 school year) 1,775 students in the 2021-22 school year
# Approved School(s) in Development: (name and planned opening year)	5 schools in development <ul style="list-style-type: none"> • KIPP Antioch College Prep High School (opening in 2023) • Rutherford Collegiate Prep (opening in 2023) • Tennessee Nature Academy (opening in 2023) • KIPP Southeast Nashville College Prep Elementary (opening in 2024) • KIPP Southeast Nashville College Prep Middle (opening in 2024)
Closed Schools:	0 schools closed since September 1, 2020
Evaluation Summary	
Identified Areas of Strength <ul style="list-style-type: none"> • The authorizer enlists expertise and competent leadership for all areas essential to charter school oversight and implements a rigorous process to select review committee members with expertise in all the key areas of authorizing. • The authorizer has a clear, comprehensive, and detailed performance accountability and compliance monitoring system that is defined in policy, clearly communicated to schools, and provides key outcomes to inform renewal, revocation, and intervention decisions. • The authorizer makes authorizing decisions that will result in positive student outcomes, in accordance with state law. 	
Identified Areas for Growth <ul style="list-style-type: none"> • The authorizer has a comprehensive compliance monitoring system, requests documents in advance of deadlines, and provides frequent reminders of compliance requirements and upcoming due dates. However, requests for compliance, documentation, and meetings are not always streamlined and create some administrative and reporting burdens on schools. • Although the authorizer periodically reviews compliance requirements, it is unclear how and to what extent the outcomes of these reviews are used specifically to increase school autonomy. • The authorizer lacks transparency and clear descriptions for its use of funds to demonstrate adequate resources are allocated to supporting authorizing work. 	
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)	Average
1a	Planning and Commitment to Excellence	3.5	3.6
1b	Human Resources	4	
1c	Financial Resources	3.33	
2a	Application Proposal Information, Questions, and Guidance	N/A	4
2b	Fair, Transparent, Quality-Focused Procedures	N/A	
2c	Rigorous Approval Criteria	4	
2d	Rigorous Decision Making	4	
2e	Elements for Existing School Operators or Replicators (if applicable)	N/A	
2f	Elements for Applicants Proposing to Contract with Educational Service Providers, including Charter Management Organizations (if applicable)	4	
3a	Charter Agreement Term, Negotiation, and Execution	3.6	3.3
3b	Rights and Responsibilities	3.5	
3c	Performance Standards	3	
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	3.9	3.8
4b	Respecting School Autonomy	3.5	
4c	Protecting Student Rights	4	
4d	School Intervention	4	
4e	Public Reporting	N/A	
5a	Revocation	4	3.75
5b	Renewal Decisions Based on Merit and Inclusive Evidence	N/A	
5c	Cumulative Report and Renewal Application	3	
5d	Fair, Transparent Process	4	
5e	Closure	4	
6	Advanced Standard (Bonus)	3.3	3.3
Overall Rating		3.9 Exemplary	

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Standard 1a - Planning and Commitment to Excellence		0	1	2	3	4
Sub-standards						
i.	Supports and advances the purposes of charter school law.				3	
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.					4
iii.	Defines external relationships and lines of authority to protect its authorizing functions from conflicts of interest and political influence.				3	
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.				3	
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.					4
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.					4
Standard Rating						3.5

Evaluative Comments:

i.	The narrative and authorizer’s strategic plan, mission and vision, biweekly newsletters, and performance framework demonstrate that the authorizer supports and advances five (5) of the six (6) purposes of charter school law. However, there is no documented evidence that the authorizer is creating new professional opportunities for teachers.
ii.	The authorizer ensures that its leadership, staff, and commission members understand and are committed to the quality charter authorizing principles and standards and are developing as authorizing professionals, as documented in attendance records, presentation decks, and agendas for various trainings including authorizer evaluation trainings, NACSA conferences, and new employee onboarding.
iii.	Conflict of interest policies, signed conflict of interest forms by commission members and authorizer staff, and an organizational chart that aligns to job descriptions and resumes demonstrate that the authorizer defines external relationships and lines of authority to protect its authorizing functions from conflicts of interest and political influence. The authorizer did note in the document debrief that the conflict of interest policy for authorization staff is new in 2022.
iv.	While the authorizer implements policies, processes, and practices that systematize its work, as evidenced through documentation (e.g., strategic plan, the reporting calendar, site visit protocols and reports, pre-opening documents, and intervention plans), some of these processes and practices are not streamlined and create a burden to schools. There are multiple handbooks and guidance documents (versus one handbook for all processes) and weekly and quarterly meetings. Some processes are also repetitive, such as implementing desktop audits, checking files at site

visits, and quarterly monitoring in addition to tracking compliance in results-based monitoring reports. School leaders stated that the volume of requests and meetings per month is a burden.

- v. The authorizer evaluates its work regularly and implements feedback to meet plans for improvement, as described in the narrative and as evidenced in the self-assessment, strategic plan process, and through work with two external consultants. School leaders also indicated that the authorizer is very receptive to feedback and listens to input on improving practices.
- vi. As documented in the mission statement document and the strategic plan, the authorizer's mission is: "To provide positive academic and life outcomes for Tennessee's students through access to high-quality public charter schools. The effectiveness of these schools will be ensured through approval and support using rigorous oversight, transparency, and accountability."
- vii. Documentation related to selected schools A and B demonstrate evidence-based application reviews that support student success with decisions to approve or deny being based on the state's scoring rubric and the performance framework. Documentation from the decision to deny the charter school application for selected school B indicates that the decision was based on evidence around the inability to serve special populations of students.

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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.					4
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.					4
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.					4
Standard Rating						4
Evaluative Comments:						
i.	The authorizer enlists expertise and competent leadership for all areas essential to charter school oversight, as demonstrated by the organizational chart, resumes, and job descriptions. According to the documentation, the authorizer also completes a rigorous process to select review committee members with expertise in all the key areas of authorizing.					
ii.	The authorizer 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 (11 schools total), as evidenced by the organizational chart, resumes, and contracts with outside providers for the new start appeals review process.					
iii.	The authorizer demonstrates an ongoing commitment to developing and retaining authorizing staff members and provides regular professional development for the authorizer’s leadership and commission members, as evidenced by attendance records and agendas for various trainings, such as the new start appeals training and attending NACSA conferences.					

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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.				3	
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.				3	
iv.	Annually reports the authorizing obligations fulfilled using the authorizer fee in accordance with state law.	N/A				
Standard Rating						3.3

Evaluative Comments:

i.	The authorizer has not yet been required to submit an annual authorizer fee report during the review term. However, as evidenced by budget documentation for FY 2021 and FY 2022, the authorizer devoted funds to fulfill its authorizing responsibilities; all revenue and expenses are directly related to authorizing; and spending is commensurate to the size of the portfolio (11 schools). However, the documentation submitted is insufficient to determine the amount collected via the authorizer fee in accordance with state law. In the document debrief, the authorizer stated that it provides a spreadsheet to schools explaining which funds are aligned to law; however, this document was not provided for review.
ii.	There is no evidence of a conflict of interest related to the authorizer’s funding structures.
iii.	The authorizer describes the process for spending in the narrative as well as indicates that the authorizer fees are used to cover staff costs for authorizing responsibilities, including the renewal process. Additionally, documentation includes a staffing pattern by funding source report that shows which staff members are paid for by fees, and budgets from both years of the review period are balanced. However, budget line items are vague (e.g., “professional services”) and do not detail authorizing responsibilities. Although the authorizer’s budgets are listed in the board agendas, there is no documented evidence that the budgets are directly shared with schools. This was confirmed by school leaders as well.
iv.	This standard is N/A because the authorizer has not yet been required to publish an annual authorizer fee report during the review term. The narrative does describe that the authorizer is planning to publish its first report in late 2022, and the documentation includes budgets from both years, which details some information on funds spent for authorizing purposes (e.g., state agency support services, commission meetings, professional services, equipment, and salaries).

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Standard 2a - Proposal Information, Questions, and Guidance Sub-standards	0	1	2	3	4
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.	N/A				
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.					
iii. Encourages expansion of charter schools that demonstrate academic success, financial viability, organizational health, and capacity for growth.					
iv. Encourages replication of charter schools that demonstrate academic success, financial viability, organizational health, and capacity for growth.					
v. Considers diverse educational philosophies and approaches.					
vi. Requires applicants to demonstrate capacity to serve students with diverse needs, such as students with disabilities or learning exceptionalities and English learners.					
Standard Rating					N/A
Evaluative Comments:					
This standard is marked N/A as the authorizer is an appellate body and does not solicit or receive new start charter applications directly.					

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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.	N/A				
ii.	Allows sufficient time for each stage of the application and school pre-opening process to be carried out with quality and integrity.					
iii.	Explains how each stage of the application process is conducted and evaluated.					
iv.	Communicates the education needs of the district, the charter authorizing processes, approval criteria, and decisions clearly to the public.					
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.					
Standard Rating						N/A
Explanation (limited to 500 words):						
This standard is marked N/A as the authorizer is an appellate body and does not solicit or receive new start charter applications directly.						

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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 state's required charter school application and scoring rubric are evidence of each of the applicant requirements cited in this sub-standard. The executive director recommendation reports for selected schools A and B refer to evidence collected during capacity interviews.					
ii.	The state's charter school application includes required questions for existing school operators or replicators, as outlined on pages four (4) and five (5) of the application, and the scoring rubric establishes the criteria for approval.					
iii.	The state's charter school application contains required questions for applicants proposing to contract with educational service providers, and the state's scoring rubric establishes the criteria for approval.					

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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.					4
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.					4
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.					4
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.					4
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.					4
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.					4
Standard Rating						4
Evaluative Comments:						

- i. The authorizer 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 as evidenced by the authorizer's policies and process on application review and approval/appeal. Board minutes cite decisions for selected schools A and B and communications documentation cite the state-required criteria. In the review decisions for selected schools A and B, the authorizer focused on the capacity of the team and referenced capacity interviews.
- ii. The authorizer rigorously evaluates each application through thorough review of the written proposal, as evidenced by the use of the state's required application and rubric as well as evaluation process documents and executive director recommendation reports for selected schools A and B. Due diligence and the use of evidence gleaned during capacity interviews are documented in recommendations as well as responses to emails.
- iii. Review teams are highly competent, with relevant experience and an understanding of authorizing and accountability, as evidenced by reviewer applications, biographies in the recommendations for the selected schools, and the reviewer recruitment document. The authorizer's general counsel attends all board meetings and public hearings and is involved throughout the review process. Reviewers also undergo training, as seen in training presentation documents.
- iv. The use of the required state application and scoring rubric, in addition to the review committee recruitment document, the review committee practice documents, and conflict of interest forms for the review teams for selected schools A and B, demonstrate that the authorizer provides training to application evaluators (including interviewers).
- v. The authorizer 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, decision makers, and applicants, as evidenced by the authorizer's conflict of interest policy, the signed conflict of interest forms for the authorizing staff and reviewers, and communication on recusal.
- vi. The use of the state's scoring rubric, the executive director recommendation documents, and the board meeting minutes and resolutions on the decisions for selected schools A and B are evidence that the authorizer approves applications that include a detailed plan for opening. Additionally, the state's scoring rubric and summary for selected school A shows the denial was based on lack of enrollment demand, operational defects, staffing issues, and an insufficient financial plan.

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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;					
ii.	Document their educational, organizational, and financial performance records based on all existing schools;					
iii.	Explain any never-opened, terminated, or non-renewed schools (including terminated or non-renewed third-party contracts to operate schools);			N/A		
iv.	Present their growth plan, business plan, and most recent financial audits;					
v.	Meet high standards of academic, organizational, and financial success to earn approval for replication; and					
vi.	Document any current or past litigation and the resolution of such litigation.					
Standard Rating						N/A
Evaluative Comments:						
This standard is N/A because neither of the selected schools is an existing operator.						

Standard 2f – Elements for Applicants Proposing to Contract with Educational Service Providers, including Charter Management Organizations (if applicable)					
Sub-standards					
	0	1	2	3	4
i. Evidence of the service provider’s educational and management success;					4
ii. A description of the process for selecting the ESP;					4
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					4
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.					4
Standard Rating					4
Evaluative Comments:					
i.	The state’s required charter school application and scoring rubric requires evidence of the service provider’s educational and management success. The executive director recommendation for selected school A also provides evidence of evaluating the service provider’s educational and management success.				
ii.	The state-required charter school application and scoring rubric require a process for selecting the ESP. The executive director recommendation document for selected school A also contains evidence of evaluating the ESP.				
iii.	Internal policy is aligned to each of the eight (8) criteria, as evidenced by the authorizer including a draft service/management contract in the agreement for selected school A. The documentation shows that the education service provider meets the state requirements and all eight (8) criteria.				
iv.	The state’s required charter school application and scoring rubric ensure 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.				

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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.					4
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.					4
iv.	Ensures mutual understanding and acceptance of the terms of the charter agreement by the school's governing board.				3	
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.					4
Standard Rating						3.6

Evaluative Comments:	
i.	The authorizer executes charter agreements with a legally incorporated governing board independent of the authorizer, as evidenced by the signed charter agreements for selected school C and D and in the authorizer's charter agreement policy.
ii.	Agreements are for an initial term of 10 operating years with annual performance reports to be produced by the authorizer as documented in the charter agreement policy and the agreements (Section 1.2 and 1.3) for selected schools C and D. However, while selected school D includes a high-stakes review every five (5) years in Section 1.3, the charter agreement for selected school C does not mention a high-stakes review every five (5) years.
iii.	The authorizer defines material and non-material terms, including governance (section 8), academics (section 2.2), financial (section 9.6 and 9.7) and operational structure (sections 2–7), changes in governance structure (section 10), addition or removal of grade level(s) (Section 10), change in student enrollment outside of thresholds set in the agreement (section 2.1), addition or removal of transportation (section 6), change to location (section 10), and change to academic focus (Section 2.2) as documented in the charter agreements from selected schools C and D and in the authorizer's policy. The agreement for selected school D also includes a clause which states that "education program matters not specifically identified in the agreement or in the charter school's application shall remain within the charter school's authority and discretion." Although this did not impact the score, the State Board recommends that the authorizer consider the addition of language to the agreement to account for addition of/changes to a CMO in alignment with the Charter Commission's amendment rule.
iv.	The authorizer ensures mutual understanding and acceptance of the terms of the charter agreement by the school's governing board, as evidenced by the signed agreements from the selected schools and the commission policy document. Agreements are executed within six (6) months of the charter term. Additionally, documentation includes email communications between both selected schools and the authorizing staff pertaining to negotiations and agreements. However, the agreement from selected school C is signed by the executive director of the school and not the governing board chair.

- v. As described in the narrative and evidenced by policy documentation and the agreements for the selected schools (section 10), the authorizer allows occasional material changes in alignment with agreements. Contract amendments for material terms of the agreement require the use of a formal amendment procedure, and non-material amendments may be made by the school operator with notice to the authorizer within 30 days. School leaders confirmed that the amendment process is posted publicly, and that the policy is clear.

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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. 				3	
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.					4
Standard Rating						3.5
Evaluative Comments:						

- i. Charter agreements for selected schools C and D meet five (5) out of six (6) standards. The agreements outline rights and responsibilities (section 2), autonomies (section 3, 4, 9), school closures (section 11), operations (Section 2), and public education obligations (section 2). This is also confirmed in policy documents, which list public education obligations and autonomies. However, although both agreements for selected schools C and D refer to performance standards (section 1.4) in Exhibit 2, and, while the authorizer submitted a separate Performance Standard document, the Exhibit 2 is not included in the agreements. The agreement therefore does not 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. Furthermore, while selected school C's agreement contains pre-opening requirements (section 1.3), there is no documentation of pre-opening requirements for selected school D.
- ii. Fee-based services are detailed in the agreements (sections 9.3 and 9.8) for the selected schools, and policy documents confirm that the parties may enter into separate fee-for-service agreements and that entering such agreements shall not be grounds for revocation or non-renewal.

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; (See Paragraph ii., Performance standards detailed information.) 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. 				3	
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 				3	

<ol style="list-style-type: none"> 1. Set expectations for student academic achievement status or proficiency, including comparative proficiency; 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> <ol 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> <ol 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. 					
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Standard Rating	3
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Evaluative Comments:

- i. The authorizer meets most of the requirements for this sub-standard, as documented in the charter agreements for selected schools C and D (Sections 1.3 and 9.6). Although a reference to the performance framework as an exhibit (which includes academic and operational standards and sources) is in both agreements for selected schools C and D, the actual exhibit (Exhibit 2) is not included in the agreements.
- ii. While the documentation did not make evident if the performance framework submitted by the authorizer was the same performance framework referenced as Exhibit 2 in the charter agreements, the submitted document meets all 13 criteria stated in this sub-standard.

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: ² <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:					
This standard is N/A, as the selected schools do not contract with an Educational Service Provider.					

² 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;					
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;					
iii.	All compensation to be paid to the ESP including all fees, bonuses, and what such compensation includes or requires;					
iv.	Terms of any facility agreement that may be part of the relationship;					
v.	Financial reporting requirements and provisions for the school governing board's financial oversight;					
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;					
viii.	Provisions for contract termination; and					
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.					
Standard Rating						N/A
Evaluative Comments:						
This entire standard is N/A, as the selected schools do not contract with an Educational Service Provider.						

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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.					4
ii.	Defines and communicates to schools the process, methods, and timing of gathering and reporting school performance and compliance data.					4
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.				3	
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.					4
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.					4
vii.	Requires and reviews annual financial audits of schools, conducted by a qualified independent auditor.					4
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.					4
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.					4
x.	Articulates and enforces stated consequences for failing to meet performance expectations or compliance requirements.					4
Standard Rating						3.9

Evaluative Comments:

- i. The authorizer implements a comprehensive performance accountability and compliance monitoring system that is defined by the charter agreement (Section 1.3 and 1.7) and confirmed by various documents such as the charter school handbook and master reporting calendar. Feedback to schools is documented through completed quarterly monitoring letters, desktop monitoring, results-based monitoring, and site visits, as well as intervention documents from selected school F.
- ii. Commission policy documents are found on the website (as evidenced through a screenshot) and in the Charter School Handbook. School leaders confirmed that the authorizer communicates reporting processes and procedures frequently via meetings, quarterly updates, newsletters, and other emails, specifically the intervention emails from selected school F.
- iii. While the authorizer has a comprehensive system for collecting information, such as the reporting calendar, quarterly monitoring, and site visits, asks for documents in advance of site visits and deadlines, and gives frequent reminders of compliance requirements, the amount of documentation does create some administrative and reporting burdens on schools. There are multiple meetings, reports, and handbooks; some are repetitive. School leaders confirmed that the number of requests and meetings present an unnecessary administrative and reporting burden.
- iv. The authorizer provides clear technical guidance to schools as needed to ensure timely compliance with applicable rules and regulations, as documented by the various policies and handbooks, the trainings for special populations, pre-opening documents, and the master reporting calendar, as well as the email updates and monthly meetings for selected school D.
- v. The authorizer visits each school as appropriate and necessary (annually) as described in the policy documents and site visit documents. Site visits are scheduled at least two (2) months prior to the site visit, as documented by the preparation presentation, and the authorizer provides a report after the site visit. The special populations onsite monitoring happens on the same day as the annual site visit to avoid multiple visits.
- vi. The authorizer evaluates each school annually and clearly communicates evaluation results to the school's governing board and leadership, as documented in the school visits, site visit prep calls, and the quarterly monitoring letter for selected School D.
- vii. Although the authorizer has not yet been required to review financial audits of schools, the authorizer requires annual financial audits of schools, conducted by a qualified independent auditor, as evidenced by the policy documents, the agreement for selected school D, and the reporting calendar. The quarterly monitoring letters also document that the audits and financials are reviewed against the performance framework.
- viii. The authorizer communicates regularly with schools as needed, including with both school leaders and governing boards, as well as provides timely notice of contract violations or performance deficiencies, as documented in the various newsletters, end-of-year closeout meetings, quarterly monitoring, results-based monitoring, and the desktop audits from selected school D. Documentation of intervention from selected school F shows that contract violations and performance deficiencies are addressed in a timely manner, as the authorizer sends communication approximately one (1) month after the interim reports from the school.
- ix. As a new authorizer, the Charter Commission has not yet provided an official annual written performance report to each school. However, documentation of regular feedback is seen in the end-of-year closeout meetings, quarterly monitoring, and results-based monitoring, as well as in site visit reports for selected school D, which includes progress on the performance framework goals.
- x. The authorizer articulates and enforces stated consequences for failing to meet performance expectations or compliance requirements as documented in the agreement for selected school D, site visit protocol, quarterly monitoring letter, the performance framework, communications with selected school F, and the reporting and monitoring flowchart. Probationary letters and corrective action plans for selected school F also document consequences for failing to meet expectations.

Standard 4b - Respecting School Autonomy		0	1	2	3	4
Sub-standards						
i.	Respects the school's authority over its day-to-day operations.					4
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.				3	
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.				3	
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						3.5

Evaluative Comments:

i.	The authorizer respects the school's authority over its day-to-day operations, as evidenced in the charter agreements from selected school D, the site visit protocol, the reporting calendar (which details what compliance requirements are due and when), newsletters, the special populations handbooks, and the corrective action plan (which was designed by the school) for selected school F. Although this did not impact the score, school leaders shared some occasions when the school's believed their authority was infringed upon.
ii.	While the authorizer has created a comprehensive reporting system, as evidenced by various documents including the screenshot of Microsoft Teams to collect data (single platform), as well as the reporting calendar, the site visit protocol, and the quarterly monitoring letters that are used to track submissions, the authorizer does not collect information from the school in a manner that minimizes administrative burdens on the school. For example, in the documentation, there are multiple handbooks, multiple meetings, and multiple audits of special populations. School leaders also discussed spending significant time responding to requests and attending meetings, particularly the quarterly and weekly meetings, quarterly emails, and the quarterly desktop audit.
iii.	As described in the narrative and confirmed in the self-assessment and the end-of-year closeout meetings documents, the authorizer periodically reviews compliance requirements through an annual review of various documents, such as the master reporting calendar, and are receptive to feedback, as affirmed by the school leaders. However, documentation does not make evident how and to what extent these reviews are used specifically to increase autonomy.
iv.	The authorizer refrains from directing or participating in educational decisions or choices that are appropriately within a school's purview under the charter law or contract, as documented in the intervention policy and reports for selected school D, as well as the communications and corrective action plan for selected school F. Although it did not impact the score, it should be noted that in the school leader interview, participants described that the authorizer sends communication to a variety of people at the school (secretaries, student support staff, etc.), which can be viewed by school leaders as interfering with their decision-making process and choices in leadership structures.

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.					4
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.					4
iii.	Ensures clarity in the roles and responsibilities of all parties involved in serving students with disabilities.					4
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.					4
Standard Rating						4

Evaluative Comments:	
i.	Section 2.1 of the agreement for selected school E states that schools are required to admit students through a random selection process. The authorizer ensures that schools are required to admit students through a random selection process by reviewing and certifying enrollment policies and procedures annually, as evidenced by the lottery review in the performance framework document, the site visit protocol, and the reporting calendar. Email communications also confirmed lottery certification for selected school E.
ii.	The authorizer ensures that schools provide equitable access and inclusive services to all students as documented by the agreement for the selected school E (section 2.3), and as documented in the charter school handbook, and the various policy handbooks and trainings for special populations. The site visit documents, results-based monitoring document, desktop audits, monthly check-in calendar invite, performance framework, and the reporting calendar, as well as the intervention letters from selected school F also document the ensuring of equitable access and inclusive services to all students.
iii.	The authorizer ensures clarity in the roles and responsibilities of all parties involved in serving students with disabilities as stated in the selected school E agreement, which details enrollment processes (Section 2.1) and discusses students with disabilities (Section 2.3). Site visit protocols and reports, handbooks, parent communication, and monitoring procedures document roles and responsibilities.
iv.	Section 2.5 of the agreement for the selected school E states that schools' student discipline policies and actions must be legal, fair, and equitable and requires schools to have clear processes, and this is documented in handbooks, site visit protocols, the performance framework, and the

reporting calendar. The interim report and intervention letters from selected school F also confirm monitoring of discipline policies and actions. The parent complaint email is also evidence that the authorizer will directly respond to complaints (a defined process), and documentation demonstrates a review of all school policies.

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.					4
ii.	Gives schools clear, adequate, evidence-based, and timely notice of contract violations or performance deficiencies.					4
iii.	Allows schools reasonable time and opportunity for remediation in non-emergency situations.					4
iv.	Applies professional discretion when intervention is needed and considers context and a range of effective solutions.					4
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.					4
Standard Rating						4

Evaluative Comments:	
i.	The authorizer has established a comprehensive intervention policy that has a clearly defined process, standards of review, and flexibility to determine criteria for intervention. Implementation is documented via probation communication and corrective action plans for selected school F. The intervention policy is posted publicly as documented in the screenshot of the authorizer’s website.
ii.	Various policies, meeting, and reporting documents, such as the results-based monitoring document, the site visit protocol and report documents, and the end-of-year closeout meeting documents for selected school D show that the authorizer gives schools clear, adequate, evidence-based, and timely notice of contract violations or performance deficiencies. Documents from selected school F confirm that notices are timely and state clear next steps.
iii.	The authorizer allows schools reasonable time and opportunity for remediation in non-emergency situations, as evidenced in the intervention policy that details reasonable timelines, and as additionally documented in the quarterly monitoring letter, the results-based monitoring report, and the missing special education documentation memo for selected school D. Communications around probation for selected school F also evidence this.
iv.	Professional discretion for intervention strategies is evident in the Intervention Policy as well as confirmed in documentation pertaining to selected schools D and F, such as the quarterly monitoring letter, the results-based monitoring report, end-of-year closeout meeting documents, and corrective action plan.

- v. The authorizer's intervention policy clearly establishes the steps that must be taken to ensure intervention strategies do not infringe on school autonomy. This is confirmed by documents such as the quarterly monitoring letter and the communication for selected school F, which document that the authorizer is focused on standards-aligned outcomes but not a specific approach or strategy.

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Standard 4e - Public Reporting Sub-standards	0	1	2	3	4
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.	N/A				
Standard Rating					N/A
Evaluative Comments:					
As stated in the narrative, the Commission did not authorize schools during the 2019–20 or 2020–21 school years and, as a result, has not yet been required to produce an annual public report on performance data for the charter schools that it authorizes. The Commission will produce its first annual report for schools authorized during the 2021–22 school year on or before January 1, 2022. Therefore, this standard is N/A.					

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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.					4
ii.	Does not make revocation decisions on the basis of political or community pressure.					N/A
Standard Rating						4
Evaluative Comments:						
i.	As detailed in the revocation policy, the authorizer will revoke 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. As described in the narrative, the authorizer has not revoked a charter during this review period. However, clear policies and procedures are detailed in its charter agreements (section 11) as well as intervention and revocation policies, and documentation from selected school F evidence that the authorizer is following its policy, as it details interventions in response to underperformance for academics, behavior, and operations.					
ii.	This sub-standard is N/A, as the authorizer has not revoked any charter agreements during the review period.					

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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.					
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.					
iii. Does not make renewal decisions on the basis of political or community pressure or solely on promises of future improvement.					
Standard Rating					N/A
Evaluative Comments:					
This entire standard is N/A as the authorizer did not complete any renewals during the review period.					

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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. 	N/A				
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.				3	
Standard Rating						3
Evaluative Comments:						
i.	This substandard is N/A. The authorizer did not implement a renewal during the term.					
ii.	Although the authorizer did not have any renewals during this term, the authorizer’s renewal policy requires applicants to utilize the state-required renewal application and provides the school meaningful opportunities to respond and correct the record. However, it is unclear whether a school seeking renewal will have time to respond to the (not yet developed) cumulative performance report, because the policy does not include this step as part of its renewal timeline.					

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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.					4
ii.	Promptly notifies each school of its renewal (or, if applicable, revocation) decision, including written explanation of the reasons for the decision.	N/A				
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.					
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.					
v.	Regularly updates and publishes the process for renewal decision making, including guidance regarding required content and format for renewal applications.					4
Standard Rating						4

Evaluative Comments:	
i.	The authorizer clearly communicates to schools the criteria for charter revocation, renewal, and non-renewal decisions as documented by a screenshot of various policies posted on its website and in charter agreements. Intervention documents for selected school F confirm that the authorizer follows its policies, even though the authorizer has not implemented a revocation during this review term. School leaders confirmed that the standards for revocation, renewal, and non-renewal decisions are clear.
ii.	This substandard is N/A; the authorizer did not implement a renewal or revocation during the review term.
iii.	This substandard is N/A; the authorizer did not implement a renewal or revocation during the review term.
iv.	This substandard is N/A; the authorizer did not implement a renewal or revocation during the review term.
v.	The authorizer regularly updates and publishes the process for renewal decision making, including guidance regarding required content and format (e.g., state-required application, public hearing) for renewal applications, as evidenced by the screenshot of the website and dated revised policy documents.

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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.					4
Standard Rating						4
Evaluative Comments:						
i.	The closure policy (included in the revocation policy document), charter agreement policy, and the agreement for selected school D (section 11.3) outline the roles and responsibilities of all parties in the event of a closure, including parental notification, records transfer, and disposition of assets and funds. According to the narrative, the authorizer has not had any school closures during the review term.					

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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.				3	
ii.	Articulates and implements an intentional strategic vision and plan for chartering, including clear priorities, goals, and time frames for achievement.					4
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.				3	
iv.	Provides an annual public report on the authorizer’s program and performance in meeting its strategic plan goals.	N/A				
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.	N/A				
Standard Rating						3.3
Evaluative Comments:						
i.	The authorizer ensures authorizing is visible and adequately resourced and that the people responsible for day-to-day authorizing functions have input over decision making, as evidenced in the Operational Budgets for FY21 and FY22, board meeting minutes, and in adequately addressing sub-standards 1avii, 1avii, 1aviii, 2di, and 5bi. Standards 2bi, 2biv, and 5aii were N/A, and the authorizer did not receive a “4” in sub-standard 1ci.					
ii.	The strategic plan, strategic plan process, and the strategic plan dashboard include priorities, goals and time frames that are defined, measurable, and timebound. As confirmed in the document debrief, the authorizer gives quarterly updates to the board on progress towards goals in the strategic plan.					
iii.	While the authorizer evaluates its work annually against part of its chartering mission and its strategic plan goals, and the authorizer implements plans for improvement and tracks progress, as documented in the self-assessment and strategic plan and process, the documentation does not make evident how the authorizer measures progress toward a portion of its mission which states, “[providing] positive academic and life outcomes for Tennessee's students”.					
iv.	This sub-standard is N/A as the authorizer’s first annual report was not required during the review term.					
v.	This sub-standard is N/A as the authorizer is an appellate body that does not solicit new applications.					