



**Executive Director's Findings and Preliminary Recommendation**  
**Charter School Renewal Application for Promise Academy Spring Hill**

**Date: October 27, 2023**

***The following recommendation is preliminary and will be updated upon completion of the public hearing.***

Pursuant to Tennessee Code Annotated (T.C.A.) § 49-13-121, Commission Policy 3.600, and charter renewal guidance issued by the Tennessee Public Charter School Commission ("Commission") and the Department of Education, the authorizer shall provide a school with the opportunity to make a clear and compelling case for renewal. On February 9, 2023, the Commission provided Promise Academy Spring Hill (PASH) with a cumulative performance report and renewal criteria. On April 3, 2023, PASH submitted a renewal application to the Tennessee Department of Education and the Commission.

As part of Commission Policy 3.600, Commission staff shall provide the operator with a preliminary renewal recommendation ahead of the public hearing. Below outlines the preliminary recommendation for PASH.

Based on a review of the cumulative performance of the school, the additional information gathered by the Commission staff through the renewal process including a site visit, and Review Committee Report, attached hereto, I believe that in consideration of the record presented, PASH is on track for a renewal recommendation in January 2024.

**STANDARD OF REVIEW**

Pursuant to Commission Policy 3.600, the Commission's staff completed an application review process. The Commission assembled a charter application review committee comprised of highly qualified internal and external evaluators with relevant and diverse expertise to evaluate each application. The Commission provided training to all review committee members to ensure consistent standards and fair treatment of all applications.

The Commission's charter renewal application review committee utilized the Tennessee Public Charter School Commission's Charter Renewal Application Rubric, which is used by the Commission when evaluating an application for renewal. In alignment with the State Board of Education's Quality Authorizing Standards in Policy 6.111, the authorizer "[e]stablishes and clearly communicates a renewal policy which requires the thorough analysis of a school's comprehensive body of objective evidence defined by the performance framework and is consistent with the charter agreement and state law, including any policy changes thereto." In addition, the Commission is required to hold a public hearing in the district where the charter school is located and conduct a renewal site visit in the school's tenth year of its charter agreement.

The Commission has the ability to approve the charter school's renewal application, with authorization to continue under the Commission for a new ten-year charter term, or deny the application, and the school would close at the end of the academic year.

**PROCEDURAL HISTORY**

1. PASH was opened in School Year 2013-2014 and was authorized by the Achievement School District (ASD).
2. PASH earned priority exit status on the state's accountability system in 2022, and the school was approved to transition to the Commission for the 2023-24 school year. PASH serves 348 students in School Year 2023-2024.

3. On February 9, 2023, the Commission provided the operator a cumulative performance report outlining the school's performance over the last ten years in alignment with the specified renewal criteria.
4. The school submitted a renewal application to the Commission on April 3, 2023.
5. The Commission's review committee independently analyzed and scored the PASH application using the Commission's Charter Renewal Application Scoring Rubric.
6. On June 27, 2023, the Commission conducted a capacity interview with the applicant to address questions that arose from the review of the renewal application.
7. The Commission's review committee determined strengths and weaknesses within the PASH renewal application, which served as the basis for the review committee report attached hereto as **Exhibit A**.
8. On September 19, 2023, the Commission completed a full day site visit to PASH to interview stakeholders, discuss the Review Committee Report with school leadership, and to observe classes.
9. During the site visit to PASH, Commission staff determined strengths and addressed challenges and concerns. These strengths, questions, and concerns are outlined within the Renewal Site Visit Report attached hereto as **Exhibit B**.
10. The Executive Director of the Commission reviewed the record including the Review Committee Report and the Renewal Site Visit Report to and has determined whether PASH is on track or off track for a renewal recommendation for consideration at the January 2024 Commission meeting.
11. The purpose of this report is to provide a preliminary recommendation to PASH prior to the public hearing scheduled for November 8, 2023.

**Commission's Review Committee's Evaluation of the Application**

Commission staff assembled a diverse review committee of internal and external experts to independently evaluate and score the PASH renewal application. This review committee consisted of the following individuals:

<b>Name</b>	<b>Title</b>
Michelle Doane	External Reviewer
Maggie Lund	Commission Staff, Deputy Director of Authorizing
Trent Carlson	Commission Staff, Authorizing Coordinator

The review committee conducted a review of the PASH renewal application in alignment with the Commission's Charter Renewal Application Scoring Rubric and held a capacity interview. The strengths and weaknesses of the renewal application are outlined within **Exhibit A**. The review committee also conducted a site visit to the school to evaluate the effectiveness of the school in alignment with the Commission's School Performance Framework, renewal criteria, and challenges and concerns outlined within the review committee report. A full site visit report is provided as **Exhibit B**. The following were key takeaways from both the review committee and site visit reports:

PASH demonstrated clear strengths academically, operationally, and financially. Upon taking over Spring Hill Elementary as part of the ASD, Promise Academy turned around the school from being in the bottom five percent of schools in the state to one of the top schools in the ASD, ultimately earning priority exit following the 2021-2022 school year. The long tenures of the school leadership, many of whom have been with the organization for ten years, are a clear strength of PASH. The Promise Academy network recently restructured the organization, moving some of the long-standing school leaders to network-level positions to better support the school for academic and operational

success. While transition is often difficult, during the site visit teachers reported being appreciative of increased support and coaching from the leadership team and network. The school also has demonstrated strong teacher retention throughout the network's organizational changes, with 86% of teachers remaining between School Year 2022-23 and School Year 2023-24. Network staff conduct monthly walkthroughs to ensure consistent alignment with vision and academic priorities, which ensures consistency across both schools and informs professional development. The operational stability of the network is also a strength as the restructure has resulted in a budget that is more sustainable on student-driven funds, and the school is projecting a positive net income in future years. Additionally, the board has a financial committee that is inclusive of individuals with strong financial acumen, and the school has contracted with a new back-office provider for further support.

The school's academic performance is somewhat mixed over its tenure with fluctuating TVAAS composite scores. However, most recently, the school earned a TVAAS 3 and demonstrated notable gains in math proficiency. Due to losing some staff, reading proficiency dropped for School Year 2022-23, and the leadership team performed a root cause analysis regarding alignment between the percentage of students meeting their growth goals internally and students performing on grade level. The school has better aligned their academic plan and assessments to focus both on growth and academic gaps in relation to grade level equivalency and has adopted a new small group intervention system and a new ELA curriculum. Finally, family engagement and a positive school community are clear strengths of PASH. Commission staff observed calm and productive classrooms, and high engagement of students was observed. Teachers held students to high expectations for participation and behavior, and there was evidence of strong teacher preparation and planning for lessons, scaffolded questions, and differentiated instruction. The school also utilizes many external partners to support students and families, and families are highly involved with the school. Families interviewed cited overall satisfaction with the school and reported open lines of communication with the school and high parent involvement. Staff, students, and leaders all reported that the school has a strong culture built on trust.

The review committee identified some areas of concern as a result of their review of the PASH application. The application lacked detail surrounding adequate service of special populations, particularly students with disabilities and English Learner (EL) students in addition to limited information regarding the RTI<sup>2</sup> program. Additionally, given the recent organizational changes, the review committee had outstanding questions regarding the impact on professional development plans and staff evaluations. Chronic absenteeism is another concern of the review committee and finally, the review committee looked to address the mixed academic performance of the school over its tenure during the site visit. Ultimately the review committee wanted to learn more about how the school and network has responded to and will continue to respond to academic data such that academic outcomes are continuously improving.

During the site visit these items were addressed as teachers and staff cited satisfaction with the organizational shifts made and the subsequent adjustments to professional development. Regarding the service of special populations, PASH provides appropriate services to support special populations in all areas. While PASH has struggled to meet special education timeline compliance so far this year, they faced additional hurdles due to the transition to TN Pulse and moving to a new district. However, PASH provided sufficient evidence that there was no disruption to required services, and the paperwork audit performed at the site visit required minimal corrections. Additionally, despite PASH's focus on RTI<sup>2</sup> and differentiated instruction for students, it was unclear to Commission staff the fidelity with which the small groups were happening for Tier 1 students, as Commission staff was unable to observe this instruction. Coupled with feedback from teachers surrounding needing better professional development and modeling for small group time, this should be a continued area of focus for the school. The chronic absenteeism rate for PASH was 16% in School Year 2021-22 and increased to 20% in School Year 2022-23. The school has implemented



an attendance plan where frequent communication is issued to parents including attendance meetings and monthly parent meetings. The network has also adopted an attendance tracker to ensure better tracking and communication to families surrounding chronic absenteeism.

Finally, as a result of scheduled interviews at the site visit, concerns were raised regarding the governing board. While the board chair was unavailable for interview during the scheduled site visit, Commission staff interviewed two other board members. Both board members cited being unaware of a formal board committee structure. Additionally, there was not a clear or aligned plan on how the Executive Director is held accountable by the board, nor was there a plan to measure the effectiveness of the board itself. Finally, it was unclear if there is a parent representative on the board. While this does not necessarily indicate that the board is not capable of continuous and effective oversight of the organization, Commission staff recommends solidifying some of practices to ensure that the board is aligned and has proper governing and oversight procedures moving forward.

For additional information regarding the review committee's evaluation of the PASH application, please see **Exhibit A** for the complete Review Committee Report, and for additional information regarding the renewal site visit and subsequent findings, please see **Exhibit B** for the complete renewal site visit report. Both reports are fully incorporated herein by reference.



## PRELIMINARY ANALYSIS

Under T.C.A. § 49-13-121 and Commission Policy 3.600, the Commission is charged with determining if a charter school currently operating under the Commission will continue its authorization under the Commission for another ten-year charter term. In making my final recommendation to the Commission, I will consider the review committee's report, the Renewal Site Visit Report, the discussion at the public hearing, and the public comments received by Commission staff.

The Promise Academy network took over Spring Hill Elementary in School Year 2013-2014 as part of the ASD and has worked diligently over the last ten years to improve the academic, operational, and financial performance of the school. While school turnaround work is not straightforward, the Promise Academy network has demonstrated a commitment to responding to academic data to address underperformance. The academic performance of PASH has been mixed over time with TVAAS scores fluctuating between composites of ones and fives and mixed academic proficiency scores. However, in School Year 2021-22, PASH saw significant improvements in both student growth and student achievement, going from a TVAAS 1 to a TVVAS 5 and more than doubling the school-wide achievement rate in both ELA and math. This data earned PASH priority exit status on the state's accountability system, and the approval to join the Commission in 2023. PASH earned a TVAAS 3 composite for School Year 2022-23, with a TVAAS Math score of a 5, and due to losing some critical staff, reading proficiency dropped in School Year 2022-23. The leadership team has performed robust root cause analyses of this data and has made changes to academic instruction including the adoption of a new ELA curriculum, better internal assessment data tracking, and the implementation of new small group instruction. While school turnaround performance is often mixed over time, the Promise Academy network has demonstrated an ability, particularly in recent years, to continuously improve and address academic deficits to better serve students.

Another commendable shift made in recent years to better the performance of the school was the recent organizational restructure, adopted in School Year 2023-2024. This restructuring included major shifts to staffing, moving some school-level leadership into network-level positions, rethinking network support for schools, and providing more robust teacher coaching and support. Many of the staff in leadership positions have been with the school for over ten years, and even through the recent restructuring, PASH was able to retain 86% of teachers for School Year 2023-2024. This stability in personnel evidences a strong school culture and a commitment to teacher practice improvement along with opportunities for growth within the organization. Additionally, at the site visit, teachers cited satisfaction with the new coaching and support model and are appreciative of the shifts. The restructure also has organizational and financial benefits including operating with a leaner staffing structure with clearer roles and responsibilities. This staffing shift placed some previous teacher coaches back in classrooms as lead teachers with ground-level coaching opportunities for teachers. This streamlined the staffing model, eliminating some positions that may have been duplicative. Additionally, the restructure placed greater emphasis on relying on student-driven funds for school operations and less reliance on fundraising and grant dollars. Overall, the network and board's ability to identify and address gaps within the organization, even at a large scale, demonstrates a commitment to being a well-run and financially viable organization that provides positive academic outcomes for students.

While I commend the school for making organizational adjustment to allow for long-term, sustainable spending, resulting in the network projecting positive net income for future years, I am unable to express an opinion on whether the school is meeting the required financial performance indicators as of the preliminary recommendation. The Commission is still awaiting the final audit for the fiscal year ending June 30, 2022. Not only is the significant delay in the audit a concern, but according to the 2020-21 audit, the school's near term indicators, which primarily measure immediate fiscal solvency, declined as a result of significant delays in receiving reimbursements from the ASD. These delays resulted in the school's cash balance and unrestricted fund balance not



meeting standard. During the same year, the school's sustainability indicators improved, however the Commission determined that the school was off track for overall financial performance. Though I recognize the school's robust and ongoing philanthropic support, without the most recent fiscal audit, I am unable to determine whether the school continues to be on track for renewal. Upon receipt of the final audit, this recommendation will be updated to reflect whether the school has made sufficient financial progress to meet standards for renewal.

Finally, I want to acknowledge that PASH operates as a true community school within the North Memphis community. With a recent event drawing over 600 families, it is clear that PASH has very strong family engagement. Families, staff, and students all referenced the school's culture of respect and family as a strength during the recent site visit. While the transition from the ASD to the Commission is not without its challenges, the Promise Academy network has navigated these challenges well and has exhibited flexibility in ensuring stronger compliance and continued service to students. PASH has also demonstrated an increase in enrollment for SY23-24 since transitioning to the Commission and maintaining a focus on student recruitment and retention will need to remain a focus for the overall operational success under a new charter team. While the school still has challenges to address such as chronic absenteeism, clarifying some oversight roles and responsibilities, and other operational compliance related items, the operator has consistently demonstrated an ability to acknowledge and respond to challenges effectively to ensure proper service to students. The school and network, particularly in recent years, have demonstrated a commitment to improving student academic outcomes and closing the achievement gap. I feel confident that as challenges continue to arise, the operator has the capacity to effectively respond, and that they will continue to operate as a strong partner with the Commission.

**PRELIMINARY CONCLUSION**

For these reasons, and for the reasons stated in the Review Committee Report attached hereto as Exhibit A and the Renewal Site Visit Report attached hereto as Exhibit B, I believe that the performance of the school is on track for a ten-year renewal term. Commission staff look forward to the upcoming public hearing.

A handwritten signature in black ink that reads "Tess Stovall". The signature is written in a cursive style.

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Tess Stovall, Executive Director  
Tennessee Public Charter School Commission

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10/27/23  
Date