TENNESSEE PUBLIC CHARTER SCHOOL COMMISSION	
Federal Programs Risk Assessment Procedures	**1037**

Beginning in the 2024-25 school year, the Tennessee Public Charter School Commission ("Charter Commission" or "TPCSC") will utilize a risk assessment procedure to coordinate targeted monitoring activities and supports to authorized charter schools to support compliance with federal programs requirements under Every Student Succeeds Act (ESSA) and Individuals with Disabilities Education Act (IDEA). This document is designed to provide an overview of the methodology for calculating each school's risk of noncompliance for each of the included program areas:

- Homeless, Foster, and Migrant Programs;
- Parent and Family Engagement;
- English Learners and Immigrant Students;
- Special Education; and
- Fiscal.

Each section contains a brief description of the included federal program(s), a description of the thresholds used to designate a monitoring tier to schools, a table outlining each of the indicators contributing to a school's total risk score, and a table outlining monitoring activities by tier designation. The indicators table provides a specific description of each indicator, how points are assigned, the maximum points possible, and the source of data.

Tier Identification and Monitoring Activities. Schools will be assigned a separate monitoring tier for each program area. Monitoring activities are targeted to specific tiers such that schools assigned a higher tier shall participate in additional or more comprehensive monitoring than schools assigned a lower tier. Tier designations and monitoring activities are specific to each program area, so a school may be assigned a lower risk tier for one program area and a higher risk tier for another program area based on the calculated risk of noncompliance for each.

Schools will automatically participate in Tier 3 monitoring activities across all applicable program areas – as determined appropriate by the Charter Commission – during the following benchmark years within the charter term:

- First year of operation under Charter Commission;
- Interim review year (Year 5);
- Renewal review year (Year 9);
- If the school site is selected as part of a LEA Results-Based Monitoring (i.e., Level 3); and/or
- At any time a significant risk is identified through the course of regular monitoring and oversight.

Risk Assessment Timeline. On an annual basis, the risk assessment process shall occur on the following timeline:

Month	Activity
May - June	District staff begin pulling data for risk calculations, review school tier identifications by program area

July	Tier identifications are finalized and communicated to schools
August	District staff provide training to schools on risk assessment process, tier identification, and monitoring activities for upcoming school year
	District staff finalize monitoring schedule by program area and tier and schedule is shared with schools
	Office hour schedules for each program area are finalized and shared with schools
	If the Charter Commission is selected for Level 3 LEA monitoring by the Tennessee Department of Education, schools selected for site visits will be informed of their elevated monitoring status
September - May	District staff conduct monitoring activities, office hours, and provide additional targeted supports as needed

LEA Results-Based Monitoring. When the Charter Commission is selected by the Tennessee Department of Education for Level 3 Results-Based Monitoring (RBM), at least two school sites are selected for additional documentation review and department-led site visits. If a school is selected by the department to participate in this monitoring process, the school automatically be identified for Tier 3 monitoring in all categories for that fiscal year. If RBM school review occurs in the year immediately preceding the school's interim review year or renewal review year, then the school will not be required to complete a full review as regularly scheduled.

Additional Resources. A resources page is included at the end of this document. This page includes links to the Charter Commission LEA monitoring procedures and contact information for district staff according to each program area.

Homeless, Foster, and Migrant Programs

This section includes indicators focused on the identification, enrollment, provision of services, and protection of rights for students experiencing homelessness, students in foster care, and migratory students. These indicators are based on requirements described in Titles I and IX of the Every Student Succeeds Act and the McKinney Vento Act.

Tier Identification Thresholds

Schools are assigned a risk tier for this section based on the percent of earned points according to the following thresholds:

- Tier 1 is defined as schools earning **less than 33%** of possible points.
- Tier 2 is defined as schools earning **between 33% and 67%** of possible points.
- Tier 3 is defined as schools earning **more than 67%** of possible points.

Homeless, Foster, Migrant Indicators

Indicator	Description	Max Points	Source of Data
School Homeless Point of Contact Experience	Number of years with a TPCSC authorized school: <1 year of experience 5 points, 1-2 years of experience 2 points, 3+ years of experience 0 points	5	Current and prior years School Main Contact List (Reporting Calendar submission)
School Foster Care Point of Contact Experience	Number of years with a TPCSC authorized school: <1 year of experience 5 points, 1-2 years of experience 2 points, 3+ years of experience 0 points	5	Current and prior years School Main Contact List (Reporting Calendar submission)
School Migrant Point of Contact Experience	Number of years with a TPCSC authorized school: <1 year of experience 5 points, 1-2 years of experience 2 points, 3+ years of experience 0 points	5	Current and prior years School Main Contact List (Reporting Calendar submission)
Number of Identified Students	One point per identified student; max 10 points.	10	EIS Data Report pulled by district staff in February; Enrollment Projections submitted by new and expanding schools through Pre-Opening
ESSA Complaints with Findings	Five points per substantiated complaint; max 10 points.	10	Prior year substantiated administrative or parent complaints
Best Interest Determination Meeting	Five points per failure to hold BID meeting in a timely manner; max	15	Prior year BID meeting documentation (Reporting

	15 points.		Calendar submission)
Procedures for Enrolling, Identifying, and Serving Students	One point per finding; max 5 points.	5	Prior year Federal Programs (Results-Based) Monitoring Instrument
Improper Identification	Five points per finding of improper identification of students or failure to appropriately report identified students; max 15 points.	15	Current year EIS Data Report, Student Information System, and school self-reported number of students.
Concerns Identified in Prior Year SPF or Quarterly Review	One point per concern; max 5 points.	5	Prior year School Performance Framework and/or Quarterly Monitoring Letters
Staff Development	Five points if district-provided training not completed annually by registrar and school POC.	5	Prior year Homeless, Foster, and Migrant Programs training attendance log
Total Possible Points		**80**	

Monitoring Activities by Tier

Monitoring Activities	Frequency	Tier 1	Tier 2	Tier 3
Federal Programs Monitoring Instrument	Annual	X	X	X
Federal Programs Monitoring Supplement*	Annual		X	X
School-Level Training Review	Annual		X	X
On-Site File Review	Annual			X
Staff Interview	Annual			X

Monitoring supplement may require review of all relevant policies, procedures, and processes

Parent and Family Engagement

This section includes indicators focused on the requirements outlined in Title I of the Every Student Succeeds Act to meaningfully engage parents and families in their child's education.

Tier Identification Thresholds

Schools are assigned a risk tier for this section based on the percent of earned points according to the following thresholds:

- Tier 1 is defined as schools earning **less than 33%** of possible points.
- Tier 2 is defined as schools earning **between 33% and 67%** of possible points.
- Tier 3 is defined as schools earning **more than 67%** of possible points.

Parent and Family Engagement Indicators

Indicator	Description	Max Points	Source of Data
20-Day Parent Notification	10 points if school fails to send required parent notification, notification is sent after the 10-day deadline, or documentation is not uploaded to the Reporting Calendar.	10	Prior year Reporting Calendar submission
Annual Title I Meeting	10 points if fewer than 25% of families attend the annual meeting; 20 points if meeting is not held by the district-provided deadline or documentation is not uploaded to the Reporting Calendar.	20	Prior year Reporting Calendar submission
Quarterly School Improvement Plan Meeting	5 points per quarterly meeting if meeting is not held, documentation is not uploaded to the Reporting Calendar, or a required stakeholder is not present.	20	Prior year Reporting Calendar submission
School Parent Compact	5 points if district-provided feedback is not addressed in final compact; 5 points if no evidence of opportunity for parent and family feedback.	10	Prior year Reporting Calendar submission
Parent and Family Engagement Policy	5 points if no evidence of annual evaluation of policy with opportunity for parent and family feedback; 10 points if policy is not shared annually; 20 points if school	20	Prior year Reporting Calendar submission

	does not have a parent and family engagement policy.		
Translation and Interpretation	10 points if school does not provide translation and interpretation services pursuant to federal requirements.	10	Prior year Federal Programs Monitoring
Policies Shared Publicly	10 points if school's policies are not shared on the website or annually in the student/family handbook; 10 points if translations are not available.	20	Prior year Reporting Calendar submission; Federal Programs (Results-Based) Monitoring Instrument
Parent Representation in Governing Board	10 points if no active parent representative (with a child currently enrolled) on board or an active advisory school council with at least one parent representative, in alignment with T.C.A. 49-13-109(a).	10	Prior year Reporting Calendar submission
Concerns Identified in Prior Year SPF or Quarterly Review	One point per identified concern not included in the indicators above; maximum of 5 points.	5	Prior year School Performance Framework and/or Quarterly Monitoring Letters
Total Possible Points		**125**	

Monitoring Activities by Tier

Monitoring Activities	Frequency	Tier 1	Tier 2	Tier 3
Federal Programs Monitoring Instrument	Annual	X	X	X
Federal Programs Monitoring Supplement*	Annual		X	X
District Attendance at SIP Meeting	Annual		X	
District Attendance at SIP Meeting	Quarterly			X
In-Depth Review of Policy, Compact, Handbook, and Title I Meeting Presentation, including evidence of family engagement	Annual			X

Monitoring supplement may require review of all relevant policies, procedures, and processes

English Learners and Immigrant Students

This section includes indicators focused on the identification, provision of services, and protection of rights for English Learners (EL) and Immigrants students according to the requirements described in Title III of the Every Student Succeeds Act.

Tier Identification Thresholds
Schools are assigned a risk tier for this section based on the percent of earned points according to the following thresholds:
- Tier 1 is defined as schools earning **less than 15%** of possible points.
- Tier 2 is defined as schools earning **between 15% and 50%** of possible points.
- Tier 3 is defined as schools earning **greater than 50%** of possible points.

English Learners and Immigrant Students Indicators

Indicator	Description	Max Points	Source of Data
EL Coordinator Experience	Number of years with a TPCSC authorized school in an EL program role: <1 year of experience 5 points, 1-2 years of experience 2 points, 3+ years of experience 0 points	5	Current and prior years School Main Contact List (Reporting Calendar submission)
English Language Proficiency Assessment (ELPA) Performance	Percent of ELs who meet growth standard: 60%+ earns 0 points, 50-59.9% earns 5 points, 40-49.9% earns 10 points, 25-39.9% earns 15 points, <25% earns 20 points.	20	Prior year school accountability files from TDOE
EL Subgroup Academic Performance (ELA)	School comparative performance to resident district in ELA, aligned with prior year School Performance Framework: Meets or Exceeds 0 points, Does Not Meet 5 points, Falls Far Below 10 points	10	Prior year School Performance Framework *Note – in the event of an extended data embargo, will use most recent available accountability data and update upon official release*
EL Subgroup Academic Performance (Math)	School comparative performance to resident district in Math, aligned with prior year School Performance Framework: Meets or Exceeds 0 points, Does Not Meet 5 points, Falls Far Below 10 points	10	Prior year School Performance Framework *Note – in the event of an extended data embargo, will use most recent available accountability data and update upon*

			official release
Title III Complaints with Findings	Five points per substantiated complaint; max 10 points.	10	Prior year substantiated administrative or parent complaints
Screening of English Learners	Inappropriate screening of students causing a student to miss services for 30 or more days after enrollment. 1-9 instances = 5 points; 10+ instances = 10 points	10	Prior year State-Approved English Proficiency Screener, TN PULSE, EIS Data Report, Student Information System
Identification of English Learners	Incorrect classification causing a student to miss services for 30 or more days after enrollment. 1-9 instances = 5 points; 10+ instances = 10 points	10	Prior year State-Approved English Proficiency Screener, TN PULSE, EIS Data Report, Student Information System
Desktop Monitoring Findings	Points are assigned based on total number of items of non-compliance as a percent: 0-4.99% non-compliance is 0 points, 5-9.99% non-compliance is 10 points, 10-19.99% non-compliance is 30 points, 20% or greater non-compliance is 50 points (max).	50	Prior year English Learner Desktop Monitoring Results
Direct Services	20 points assigned for failure to provide service schedule providing required minutes for daily ESL instruction by licensed ESL teacher	20	Prior year service schedule submitted through Reporting Calendar
Staffing and Licensure	10 points assigned for failure to meet 1:35 ESL-endorsed teacher to L/W/T1/T2 student ratio	10	Prior year Personnel Report submitted through Reporting Calendar
Procedures for Enrolling, Identifying, and Serving Students	One point per finding; max 5 points.	5	Prior year Federal Programs (Results-Based) Monitoring Instrument
Staff Development	10 points assigned if school-level EL training does not meet all state and district-level requirements.	10	Current year EL training materials and participation logs submitted through Reporting Calendar
TPCSC Site Visit	2 points assigned per Title III related finding, max 20 points.	20	TPCSC On-Site Monitoring Report, Quarterly Review Letters
Student Attrition	School retention of English	10	Prior year School

	Learners compared to overall student retention rate, based on prior year School Performance Framework: Meets or Exceeds 0 points, Does Not Meet 5 points, Falls Far Below 10 points		Performance Framework
EL Population Size	School English Learner population (L/W/T1/T2) is: 0-24.99% of overall student population 0 points 25-34.99% of overall student population 10 points 35% or greater of overall student population 20 points	20	EIS Data Reports
Student Comparative Population	School Limited English Proficient population (L/W/T1/T2/T3/T4) compared to the resident district average: >5 percentage points below resident district average 0 points, 5-10 percentage points below resident district average 5 points, >10 percentage points below resident district average 10 points	10	EIS Data Reports, TN District Report Card data (Note: lagging year district data)
Staff Attrition	3 points assigned if 2 or more EL staff members turnover during prior year or between prior and current year; 5 points assigned if greater than 50% turnover prior to current year.	5	Current and prior year Personnel Reports submitted through Reporting Calendar
Concerns Identified in Prior Year SPF or Quarterly Review	One point per identified concern not included in the indicators above; maximum of 5 points.	5	Prior year School Performance Framework and/or Quarterly Monitoring Letters
Total Possible Points		**240**	

Monitoring Activities by Tier

Monitoring Activities	Frequency	Tier 1	Tier 2	Tier 3
Federal Programs Monitoring Instrument	Annual	X	X	X
Federal Programs Monitoring Supplement*	Annual		X	X
On-Site File Review	Annual			X
Desktop Monitoring	Annual	X		
	Semi-Annual		X	

	Quarterly			X
On-Site Direct Service Observation and Interview**	Annual	X	X	
	Semi-Annual			X
Supplementary Program Interviews	Annual			X

Monitoring supplement may require review of all relevant policies, procedures, and processes
**The second monitoring visit may be conducted virtually in lieu of an on-site visit, if deemed appropriate by the Charter Commission*

Special Education

This section includes indicators focused on the identification, provision of services, and protection of rights for students with disabilities according to the requirements described in the Individuals with Disabilities Education Act and Section 504 of the Americans with Disabilities Act.

Tier Identification Thresholds

Schools are assigned a risk tier for this section based on the percent of earned points according to the following thresholds:

- Tier 1 is defined as schools earning **less than 15%** of possible points.
- Tier 2 is defined as schools earning **between 15% and 50%** of possible points.
- Tier 3 is defined as schools earning **greater than 50%** of possible points.

Special Education Indicators

Indicator	Description	Max Points	Source of Data
Special Education Coordinator Experience	Number of years with a TPCSC authorized school in a special education role: >1 years of experience 5 points, 1-3 years of experience 2 points, <3 years of experience 0 points	5	Current and prior years School Main Contact List (Reporting Calendar submission)
504 Coordinator Experience	Number of years with a TPCSC authorized school: >1 years of experience 5 points, 1-3 years of experience 2 points, <3 years of experience 0 points	5	Current and prior years School Main Contact List (Reporting Calendar submission)
SWD Subgroup Academic Performance (ELA)	School comparative performance to resident district in ELA, aligned with prior year School Performance Framework: Meets or Exceeds 0 points, Does Not Meet 5 points, Falls Far Below 10 points	10	Prior year School Performance Framework *Note – in the event of an extended data embargo, will use most recent available accountability data and update upon official release*
SWD Subgroup Academic Performance (Math)	School comparative performance to resident district in Math, aligned with prior year School Performance Framework: Meets or Exceeds 0 points, Does Not Meet 5 points, Falls Far Below 10 points	10	Prior year School Performance Framework *Note – in the event of an extended data embargo, will use most recent available accountability data and update upon official release*
Alternate Assessment	10 points assigned if percent of	10	Current Year TN PULSE

Participation	students participating in Alternate Assessment is greater than 1% of the overall student population.		Alternate Assessment participation report
Desktop Monitoring Findings (Special Education and 504)	Points are assigned based on total number of items of non-compliance as a percent: 0-4.99% non-compliance is 0 points, 5-9.99% non-compliance is 10 points, 10-19.99% non-compliance is 30 points, 20% or greater non-compliance is 50 points (max).	50	Prior year Special Education Desktop Monitoring Results
Isolation and Restraint Reporting	2 points assigned per failure to report instance of isolation or restraint within mandated timeline, max 10 points.	10	TN PULSE
IDEA or 504 Complaints with Findings	Five points per substantiated complaint; max 10 points.	10	Prior year substantiated administrative or parent complaints
TPCSC Site Visit	2 points assigned per IDEA or 504 related finding, max 20 points.	20	TPCSC On-Site Monitoring Report, Quarterly Review Letters
Staffing and Licensure	10 points assigned for failure to provide services with appropriately licensed or credentialed staff.	10	Prior year Personnel Report submitted through Reporting Calendar
Procedures for Enrolling, Identifying, and Serving Students (including Child Find)	One point per finding; max 5 points.	5	Prior year Federal Programs (Results-Based) Monitoring Instrument
IDEA and 504 Timeline Compliance	5 points assigned per instance of failure to maintain compliance with statutory timelines, max 50 points.	50	TN PULSE
Staff Development	10 points assigned if school-level Special Education training does not meet all state and district-level requirements.	10	Current year SPED training materials and participation logs submitted through Reporting Calendar
Student Attrition	School retention of students with disabilities compared to overall student retention rate, based on prior year School Performance Framework:	10	Prior year School Performance Framework

	Meets or Exceeds 0 points, Does Not Meet 5 points, Falls Far Below 10 points		
Staff Attrition	3 points assigned if 2 or more special education staff members turnover during prior year or between prior and current year; 5 points assigned if greater than 50% turnover prior to current year.	5	Current and prior year Personnel Reports submitted through Reporting Calendar
Student Comparative Population	School student with disability population compared to the resident district average: >5 percentage points below resident district average 0 points, 5-10 percentage points below resident district average 5 points, >10 percentage points below resident district average 10 points	10	EIS Data Reports, TN District Report Card data
Concerns Identified in Prior Year SPF or Quarterly Review	One point per identified concern not included in the indicators above; maximum of 5 points.	5	Prior year School Performance Framework and/or Quarterly Monitoring Letters
Total Possible Points		**235**	

Monitoring Activities by Tier

Monitoring Activities	Frequency	Tier 1	Tier 2	Tier 3
Federal Programs Monitoring Instrument	Annual	X	X	X
Federal Programs Monitoring Supplement*	Annual		X	X
On-Site File Review	Annual			X
Desktop Monitoring	Annual	X		
	Semi-Annual		X	
	Quarterly			X
On-Site Direct Service Observation and Interview**	Annual	X	X	
	Semi-Annual			X
Supplementary Program Interviews	Annual			X

*Monitoring supplement may require review of all relevant policies, procedures, and processes
**The second monitoring visit may be conducted virtually in lieu of an on-site visit, if deemed appropriate by the Charter Commission

Fiscal

This section includes indicators focused on the management of grant funds and equipment and inventory purchased using grant funds according to the fiscal requirements of the Education Department General Administrative Regulations (EDGAR) and the district's Uniform Grants Guidance procedures.

Tier Identification Thresholds

Schools are assigned a risk tier for this section based on the percent of earned points according to the following thresholds:

- Tier 1 is defined as schools earning **less than 33%** of possible points.
- Tier 2 is defined as schools earning **between 33% and 67%** of possible points.
- Tier 3 is defined as schools earning **more than 67%** of possible points.

Fiscal Indicators

Indicator	Description	Max Points	Source of Data
Grant Draw-Down Rate	Points are assigned according to the following timeline: 5 points if school fails to submit reimbursement request(s) for available grants on a monthly basis; max 50 points.	50	Grant Reimbursement Tracker
On-Time Reporting	Points are assigned according to the following: 2 points per fiscal report submitted late within one week of the deadline, 5 points per fiscal report submitted more than one week after the deadline, Max 50 points.	50	Fiscal Year Closeout submissions
Fiscal Policies and Procedures	5 points per finding; max 50 points.	50	Prior year Federal Programs (Results-Based) Monitoring Instrument
Reimbursement Documentation	2 points assigned per instance of missing or inappropriate reimbursement supporting documentation, max 50 points.	50	Grant Reimbursement Tracker
Procurement	5 points assigned per failure to comply with Davis Bacon Act or other federal or state procurement requirements and procedures, max 50 points.	50	Prior year Federal Programs (Results-Based) Monitoring Instrument, Fiscal Year Closeout submissions

Inventory	5 points assigned per missing inventory or equipment; 5 points assigned for incomplete inventory and equipment logs; max 20 points.	20	Fiscal Year Closeout inventory log submission; On-Site Monitoring
Maintenance of Effort	25 points assigned for failure to meet IDEA maintenance of effort eligibility or compliance requirement, max 50 points.	50	GP SPED Budget, Comprehensive Final Expenditure Report
Concerns Identified in Prior Year SPF or Quarterly Review	One point per identified concern not included in the indicators above; maximum of 5 points.	5	Prior year School Performance Framework and/or Quarterly Monitoring Letters
Total Possible Points		**325**	

Monitoring Activities by Tier

Monitoring Activities	Frequency	Tier 1	Tier 2	Tier 3
Federal Programs Monitoring Instrument	Annual	X	X	X
Federal Programs Monitoring Supplement*	Annual		X	X
Comprehensive Final Expenditure Report Verification	Annual		X	X
On-Site Equipment and Inventory Review	Annual			X
Procurement Audit	Annual			X
Fiscal Staff Interviews	Annual			X

Monitoring supplement may require review of all relevant policies, procedures, and processes

Resources

Charter Commission Contact Information

Name	Email	Areas of Focus
Nate Parker, *Director of School Programs and Supports*	Nate.Parker@tn.gov	Federal Programs Monitoring Voluntary Pre-K State Grant Programs
Claire Seguin, *Federal Programs Coordinator*	Claire.Seguin@tn.gov	Title I Parent and Family Engagement School Improvement Planning Extended Learning Turnaround Action Grant (TAG) Homeless Students Students in Foster Care Migratory Students
Katie Bridges, *Exceptional Education Coordinator*	Katie.Bridges@tn.gov	IDEA and Section 504 Special Education Dyslexia
John Bowyer, English Learner Program Coordinator	TBD	Title III English Learners and Immigrant Students
Melanie Harrell, *Director of Finance and Operations*	Melanie.Harrell@tn.gov	Fiscal Monitoring and Supports General Purpose Funds (TISA)
Gomer Pascual, *Finance Programs Manager*	Gomer.Pascual@tn.gov	Grant Reimbursements Fiscal Year Closeout Process
Noelle Farley, *Grant Coordinator*	Noelle.Farley@tn.gov	Grant Reimbursements Fiscal Year Closeout Process

Policy and Procedure Links

Charter Commission policies and procedures can be accessed at the Rules and Policies page on the Charter Commission website. Monitoring and reporting processes can be found in the following procedure documents. Relevant LEA Policies and LEA Procedures are listed below:

Homeless, Foster, and Migrant:
- Enrollment Procedures
- Homelessness Procedures
- Foster Care Procedures
- Migrant Education Program Procedures

Parent and Family Engagement:
- Commission Charter School Handbook
- Translation and Interpretation Procedures

- Title I School Planning Procedures
- District Parent and Family Engagement Plan

English Learners and Immigrant Students:
- Enrollment Procedures
- English Learners Monitoring Procedures
- Individual Learning Plan (ILP) Monitoring Procedures

Special Education:
- 504 Plan Monitoring Procedures
- Child Find Procedures
- Special Education Monitoring Procedures
- Preschool LRE Procedures
- Students with Disabilities Discipline Procedures
- Gifted Students Procedures

Fiscal
- Procurement Procedures
- Uniform Grants Guidance Policies and Procedures
- IDEA Maintenance of Effort Procedures

Other
- Special Populations On-Site Monitoring Procedures
- Reporting Calendar Procedures
- Grievance and Complaints Procedures