



Tennessee Department of Education

High-Stakes Decision Making

Authorizer Toolkit | August 2026



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High-Stakes Decision Making

Authorizers are responsible to students and the public to make decisions that impact the renewal, non-renewal, or revocation of a charter agreement. These decisions determine whether a school continues to operate, whether families maintain continuity, and whether public resources continue to be invested in a charter school; they are referred to as “high-stakes” decisions. These decisions are anchored in the authorizer’s established performance framework, the school’s charter agreement, state law ([T.C.A. § 49-13-122](#)), and a transparent, predictable oversight process.

High-stakes decisions can be emotionally charged. Schools have poured years of work, identity, and commitment into their programs. Families have invested trust in the school to provide a high-quality education for their children. Staff have committed to a career there. When decisions can have significant, often irreversible consequences, it is important to make these decisions with clarity, accuracy, and integrity. If authorizers ensure the following principles are followed and relationships have been nurtured throughout the charter term, high-stakes decisions are more likely to be understood, respected, and legally sound.

- **Evidence-Based:** Decisions are grounded in objective performance data and aligned to the authorizer’s established performance framework
- **Transparent:** Schools are never blindsided. Ongoing conversations, annual reports, and Indicators of Distress (IOD) monitoring make trajectories clear.
- **Predictable:** Schools have had chances to improve. Intervention ladders and informal support offer multiple opportunities to correct course.
- **Fair:** Decisions are defensible and implemented consistently across schools.
- **Respectful:** Communication is delivered with clarity, respect, and empathy. Even when outcomes are unfavorable, schools feel heard and understood.
- **Student-Centered:** Student learning conditions, safety, and academic success are prioritized, and decisions reflect a shared commitment to students.

Role of the District Charter School Authorizing Office

The district charter school authorizing office staff are the professionals who engage with the schools it authorizes every day. They review data continuously, conduct site visits, engage with governing boards, monitor compliance, and build long-term relationships that help illuminate both strengths and areas of concern. This staff provides ground-level expertise and builds the evidentiary record that makes fair, consistent, and defensible decisions possible by doing the following:

- Providing objective, evidence-based recommendations grounded in the performance frameworks and charter agreement
- Surfacing risks early and applying consistent standards across the portfolio
- Contextualizing the data with on-the-ground observations and long-term patterns
- Working with other district offices that interact with charter schools to collect data and identify concerns
- Preparing reports, renewal recommendations, and public materials that ensure transparency
- Serving as the primary source for technical, analytical, and legal guidance to the board

Role of the Authorizing Board

Local boards of education who authorize charter schools hold statutory authority to make high-stake decisions. They are the ultimate decision makers and stewards of public trust. Their role is distinct from staff in that they are not conducting ongoing oversight, but instead, acting on the information provided to them to protect students and the public interest. The board's responsibilities include:

- Making final decisions on renewal, non-renewal, revocation, and major interventions;
- Ensuring their decisions are aligned with the performance framework, the charter agreement, Tennessee law, and quality authorizing standards;
- Considering public comment, community perspectives, and system-level implications within the boundaries of the evidence presented;

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- Ensuring decisions are consistent across schools and across years; and
- Conducting their processes in a way that does not undermine their ultimate decisions through appeals or litigation.

Board members are responsible for determining what best serves the community's collective interests, and this often requires making difficult decisions.

A Well-Functioning Partnership

The district charter school authorizing office and authorizing board work together to establish and implement high-stakes decision-making processes. When the district charter authorizing office provides thorough analyses grounded in objective data and board members are equipped with the knowledge and tools needed to fulfill their governance responsibilities, decisions are more transparent and consistent. Establishing clear expectations for communication, preparation, and inquiry helps maintain the integrity of the process while fostering a productive dialogue. The following are some best practices to ensure a well-functioning partnership.

- Staff recommendations are evidence-based and clearly communicated.
- Board members are prepared in advance through orientation, refresher training, and regular briefings on the performance framework, renewal criteria, and legal obligations.
- Board members are provided with written, well-structured decision packets that make it easy to see how the evidence leads to the recommended action.
- Norms are established for how board members may ask clarifying questions without undermining the integrity of the process.

While these decisions rest with the authorizing board or the Tennessee Public Charter School Commission (TPCSC), they must be informed by the professional judgment and day-to-day expertise of district charter school authorizing office staff. Strong authorizing happens when staff expertise and board authority work in harmony with each reinforcing the other in service of students.

Charter School Renewal

Renewal is not simply an evaluation of one year—it is an evaluation of the entire charter term. Renewal is the culmination of the charter term and represents a holistic judgment about a school's ability to continue operating. A strong renewal process begins years before the renewal deadline through the following:

- Ongoing data analysis
- Annual performance reports
- Site visit observations
- Mid-year and end-of-year conversations
- Intervention responses
- IOD trend monitoring

A strong renewal process protects school autonomy, supports student success, and serves the public interest by ensuring schools meet high standards in academics, finance, and operations.

Renewal Policy

Authorizers are required to adopt a renewal policy which requires thorough analysis of a school's comprehensive body of objective evidence defined by the performance framework and consistent with the charter agreement and state law. The policy should address all the required renewal components and the associated timelines listed below and outlined in [T.C.A. § 49-13-121](#).

Annual Notification

Pursuant to [T.C.A. § 49-13-121\(a\)\(1\)](#), authorizers must notify each charter school annually whether it is "on-track" or "off-track" for renewal. Also, [T.C.A. § 49-13-120\(b\)](#) further requires that this information must also be included in the annual authorizer report.

Interim Review

In compliance with [T.C.A. § 49-13-121\(k\)](#), an authorizer shall conduct an interim review of its charter school in the fifth year of the charter school's term. As part of the interim review, charter schools are required to submit a report to the authorizer on the progress of the charter school in achieving its goals and objectives, including student performance and other terms of the approved charter agreement. Interim reviews provide the authorizer with an opportunity to

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review overall renewal status with the charter school and should be considered as part of the record during renewal. The [Charter School Interim Review Guidelines and Report Template](#) provide information on what should be included in the review and a template that can be adapted as needed.

Cumulative Report

Pursuant to [T.C.A. § 49-13-121\(c\)](#), the authorizer must provide a cumulative performance report to the charter school three months prior to the date the charter school is required to submit a renewal application. While the law and established quality authorizing standards do not prescribe what must be included in this report, the following are recommended to be included:

- Renewal criteria which are anchored to statutory requirements in T.C.A. Title 49, Chapter 13, accountability requirements established in the charter agreement, and the performance framework
- Summary of the academic, financial, and organizational performance on the authorizer's performance framework up through the most recent annual evaluation
- Summary of qualitative data from site visits to capture strengths that may not be apparent in quantitative data
- Documentation of any indicators of distress (IOD) or interventions that have been implemented and responsiveness of the school
- Clear information on the possible renewal outcomes and where the school stands at this point

Although not required, it is also recommended to provide a draft of the report and allow the school an opportunity to provide a written response with evidence or context. This transparency builds legitimacy and public trust.

Renewal Application

Pursuant to [T.C.A. § 49-13-110\(b\)\(1\)](#), charter agreements expire 10 academic years after the first day of instruction (except for some agreements executed by the Tennessee Public Charter School Commission (TPCSC)). Also, in accordance with [T.C.A. § 49-13-121\(a\)](#), a charter school seeking to renew its agreement must submit the [Charter School Renewal Application](#) no later than April 1 of the **year prior** to the year the charter expires.

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Renewal applications should allow authorizers to answer the following questions:

- Has the school met its academic goals?
- Has the school been faithful to its mission and vision?
- Has the school been effectively governed?
- Is the school fiscally sound?
- Are parents and students satisfied?
- Has the school satisfactorily met its legal obligations?

Pursuant to [T.C.A. § 49-13-121\(b\)](#), a public charter school renewal application shall contain a report of the school's operations, including students' standardized test scores, financial statements, and audits of the eight years immediately preceding the date of the renewal application. The application referenced above includes all the required components for the application, and additional supporting documentation can be provided.

Renewal Decision

Renewal of public charter schools should be granted 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. The authorizer shall, at a minimum, consider the renewal application, the school's annual reports, interim reviews, cumulative performance reports, and audits when making renewal decisions.

Authorizers should develop a standardized scoring rubric that is used for each renewal decision. A [model scoring rubric](#) can be found on the State Board of Education website. Pursuant to [T.C.A. § 49-13-121\(d\)](#), authorizers must decide whether to renew the charter on or before February 1 during the year in which the charter agreement expires.

Also, as mandated by [T.C.A. § 49-13-121\(e\)](#), a school that submits a renewal application and meets the criteria to be designated as a "high performing public charter school" shall be automatically renewed by the authorizer. To be considered a high performing public charter school, the school must demonstrate that it:

- Met or exceeded standards on at least 75 percent of the indicators in each section of the performance framework in each of the three immediately preceding school years;
- Attained of a composite level of "above expectations" or "significantly above expectations" on the Tennessee Value-Added Assessment System (TVAAS) in each of the three immediately preceding school years; **and**
- Has had no significant audit findings during the term of the current charter agreement.

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No later than 10 days from the renewal decision, the authorizer must report the decision to the department and TPCSC. The report must include a copy of the resolution that sets forth the authorizer's decision and the reasons for the decision.

Authorizers should submit the decision resolution to the department via the [Charter Document Upload Form](#) and to TPCSC via email at Charterschool.Applications@tn.gov.

Renewal Appeals

Pursuant to [T.C.A. § 49-13-121\(e\)\(3\)](#), if a renewal is denied by an authorizer, the charter school governing body may appeal this decision to the TPCSC within 10 days of the decision to deny the renewal. TPCSC has specific renewal appeal guidelines on its [website](#) and will render a decision within 60 calendar days unless an extension is agreed upon by both the authorizing local education agency (LEA) and the charter school governing board.

Revocation

Revocation is a significant step for an authorizer. In Tennessee, a charter school agreement may be revoked for several reasons—some determined by the authorizer's discretion and others required by law.

If an authorizer determines that a public charter school meets the criteria for revocation, the authorizer must provide written notification to the public charter school with at least 30 days prior to taking action, outlining the potential revocation and the specific reasons for this action.

General Revocation Situations

[T.C.A. § 49-13-122\(b\)](#) identifies that an authorizer may revoke a charter agreement if it determines that the charter school:

- Committed a **material** violation of the conditions, standards, or procedures set forth in the charter agreement;
- Failed to meet or make sufficient progress toward the performance expectations set forth in the charter agreement; or
- Failed to meet generally accepted standards of fiscal management.

[T.C.A. § 49-13-122\(c\)\(2\)](#) requires that if the authorizer determines that a charter school meets the above criteria, the authorizer shall promptly notify the charter school and provide an

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opportunity to remedy the situation within a specified timeframe established by the progressive intervention policy adopted. More information on the progressive intervention policy can be found in the Effective Support and Oversight section.

If the school does not remedy the situation according to the progressive intervention policy and the authorizer plans to seek revocation, [T.C.A. § 49-13-122\(e\)](#) requires that the school shall be notified in writing at least 30 days prior to the decision and provided the reasons for the possible revocation.

For public charter schools authorized by a local board of education, the board's decision to revoke the school's charter agreement may be appealed to the Tennessee Public Charter School Commission (TPCSC) within 10 days of the decision pursuant to [T.C.A. § 49-13-122\(h\)\(1\)](#). In addition, TPCSC has specific guidelines for [the revocation appeal process](#) and will render a decision within 60 calendar days unless an extension is agreed upon by both the authorizing LEA and the charter school governing board.

Emergency Situations

A charter agreement may be revoked at any time by the authorizer in an emergency situation. [T.C.A. § 49-13-122\(d\)](#) does not provide an exhaustive list of emergency situations, but notes an emergency includes the following:

- Fraud
- Misappropriation of funds
- Flagrant violations of health and safety laws, rules, and regulations
- Flagrant disregard of the charter agreement

Pursuant to [T.C.A. § 49-13-122\(d\)](#), the authorizer is not required to implement the progressive intervention policy before making the decision to revoke the charter agreement. However, the 30-day notification with the reasons for possible revocation is still required, and the appeals process outlined above is available. Decisions to revoke a charter based upon an emergency situation may become effective at any time of the year.

Priority Identification Situations

The department releases accountability data annually, which includes both federal accountability and state accountability information. Under the federal Every Student Succeeds Act (ESSA), schools can be designated as Reward Schools, Comprehensive Support and

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Improvement (CSI) schools, Targeted Support and Improvement (TSI) schools, and Additional Target Support and Improvement (ATSI) schools. Schools can be added and removed from these designations each year, but none of these designations will ever trigger a potential revocation situation.

The state has an additional designation for low performing schools, which is the priority school designation. The state determines priority schools on a three-year cycle. The criteria to be identified as a priority school is the same as the CSI designation. The latest priority school list was released in the fall of 2025, and the next priority school identification will occur in 2028.

Opportunity Public Charter Schools (OPCS) and adult charter schools are exempt from revocation due to priority designation.

First-Cycle Priority Identification

Pursuant to [T.C.A. 49-13-122\(a\)\(1\)](#), if a charter school is identified as a priority school, an authorizer **may** revoke the charter agreement but is not required to do so by law. However, if revocation is not pursued, the charter school must develop and implement a comprehensive support and improvement (CSI) plan, which is required for all schools designated as CSI and priority schools.

If revocation is pursued, it takes effect immediately following the close of the school year in which the school is identified as a priority school, and there is no appeal process for this decision. The charter may, however, request a review by the department to verify the accuracy of the data used to identify the school as a priority school.

Second-Cycle Priority Identification

If a charter school is identified as a priority school for two consecutive cycles, [T.C.A. 49-13-122\(a\)\(3\)](#) **requires** an authorizer to revoke the school's charter agreement.

In accordance with [T.C.A. 49-13-122\(a\)\(4\)](#), this revocation takes effect immediately following the close of the school year in which the school is identified as a priority school for two consecutive cycles, and there is no appeal process for this decision. The charter may, however, request a review by the department to verify the accuracy of the data used to identify the school as a priority school.

Revocation Reporting

In compliance with [T.C.A. 49-13-122\(g\)](#), the authorizer must report the decision to the department and TPCSC no later than 10 days from the revocation decision. The report must include a copy of the resolution that sets forth the authorizer's decision and the reasons for the decision. Authorizers should submit the decision resolution to the department via the [Charter Document Upload Form](#) and to TPCSC via email at Charterschool.Aapplications@tn.gov.

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