



Charter School Authorizer Evaluation Report
Memphis Shelby County Schools
2023

Charter School Authorizer Evaluation 2023

Authorizer: Memphis-Shelby County Schools

About the Charter School Authorizer Evaluations

In 2019, the General Assembly charged the State Board of Education (“State Board”) with conducting periodic evaluations of authorizers to determine authorizer compliance and evaluate quality. Tennessee was 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 engaged with Tennessee authorizers, charter school stakeholders, and similar state agencies responsible for this work and conducted a pilot evaluation in Fall 2020. 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 exempt 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 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 ○ Memphis-Shelby County Schools ○ Rutherford County Schools (beginning in 2025)
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 21 standards within the State Board’s Quality Charter Authorizing Standards. The standards are organized into five (5) categories: Agency Commitment and Capacity; Application Process and Decision Making; Performance Contracting; Ongoing Oversight and Evaluation; and Amendment, Renewal and Revocation Decision Making. The authorizer’s overall rating is based on the evaluation team’s consideration of evidence weighed against the standards.

Characteristics of the Process

- Each authorizer is evaluated by an evaluation team with experience in charter school authorizing and/or authorizer evaluations. 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.

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- Evaluations focus on a two (2) year review term¹ and are limited to the review of the following evidence: 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 a performance level (see Table 2) between zero (0) and four (4) that best represents the authorizer’s practice.
- The final product of each evaluation is this 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 and relevant feedback for the authorizer. Comments also note cases in which the authorizer did not provide relevant documentation.
- While the State Board developed its evaluation process to ensure it is fair and consistent across authorizers, evaluation of the twenty-one (21) 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, the final Evaluation Report will be presented to the State Board for approval at the meeting following the release of the final 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 50% OR LESS of the standard	Documentation addresses <u>and</u> satisfies MORE THAN 50% of the standard	Documentation addresses <u>and</u> satisfies 100% 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, 2021 - August 31, 2023.

Executive Summary

General Information	
Authorizer:	Memphis Shelby County Schools (MSCS)
About the Authorizer:	MSCS is a district authorizer in Shelby County. MSCS opened its first charter school in 2003 and its charter schools currently serve approximately 18% of the district’s students.
# Operational Schools:	54 schools in the 2022-23 school year
# Students Enrolled:	18,116 students in the 2022-23 school year
# Approved School(s) in Development: (name and planned opening year)	Three (3) schools in development <ul style="list-style-type: none"> • TN Career Academy (new school opening in 2024) • Westside Middle School (opening under MSCS in 2024) • Journey Coleman (opening under MSCS in 2024)
Closed Schools: (name and year closed)	Three (3) schools closed since September 1, 2021 <ul style="list-style-type: none"> • KIPP Memphis Academy Middle (2023) • Memphis Academy of Health Sciences (2022) • Memphis Academy of Health Sciences High School (2022)
Evaluation Summary	
<p>Identified Areas of Strength</p> <ul style="list-style-type: none"> • The authorizing staff implements an application process that is rigorous, well-publicized, and open to all by developing resources for applicants, such as informational videos and application information sessions. • The authorizer actively ensures it respects charter school autonomy over day-to-day operations and collects information in a manner that minimizes administrative burdens on its schools. • The authorizer executes a closure process that is clearly communicated, consistent with the charter agreement, and in accordance with state guidance and law. <p>Identified Areas for Growth</p> <ul style="list-style-type: none"> • The authorizer’s charter agreement negotiation and execution process must ensure timely execution of agreements and mutual understanding and acceptance of the agreement by charter school governing boards. • The authorizer’s lack of clearly stated reasons regarding application, renewal, and amendment decisions make it difficult to determine if decisions are aligned to stated approval criteria or if decisions are solely based on political or community pressure. When making a motion, decision-makers should clearly state evidence-based reasons for the proposed action ahead of the board’s vote. • The authorizer’s organizational performance monitoring does not sufficiently evaluate whether its schools are appropriately serving all special populations of students and implementing fair, legal, and equitable discipline policies, and actions. <p>Required Follow Up Actions</p> <ul style="list-style-type: none"> • Public recognition and highlighting authorizer best practices by the State Board. 	

- Exemption from the 2025 evaluation as the authorizer achieved an Exemplary rating for two (2) consecutive evaluation years.
- Submission of a self-assessment in the 2024-25 school year, as required for all authorizers during a non-evaluation year.

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Overall Ratings Summary:

Standard		Rating (0-4)	Average
1a	Planning and Commitment to Excellence	3.4	3.8
1b	Human Resources	4	
1c	Financial Resources	4	
2a	Proposal Information, Questions, and Guidance	4	3.8
2b	Fair, Transparent, Quality-Focused Process	4	
2c	Rigorous Approval Criteria	4	
2d	Rigorous Decision Making	3.2	
3a	Charter Agreement Negotiation and Execution	2	2.86
3b	Terms, Rights and Responsibilities	3.6	
3c	Performance Standards	3	
3d	Provisions for Educational Service Provider (ESP) (if applicable)	N/A	
4a	Performance Evaluation and Compliance Monitoring	3.71	3.44
4b	Respecting School Autonomy	3.6	
4c	Protecting Student Rights	2.5	
4d	School Intervention	3.4	
4e	Public Reporting	4	
5a	Amendments to the Charter Agreement	3.25	3.57
5b	Renewal Process	3.5	
5c	Renewal Decisions Based on Merit and Inclusive Evidence	3.33	
5d	Revocation	3.8	
5e	Closure	4	
Overall Rating		3.51 Exemplary	

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Standard 1a - Planning and Commitment to Excellence		0	1	2	3	4
Sub-standards						
i.	Ensures that the authorizer’s decision-makers, leadership, and staff understand and are committed to these quality charter authorizing principles and standards.					4
ii.	Ensures external relationships, funding structures, and lines of authority to protect its authorizing functions from conflicts of interest and political influence that might compromise its judgement in charter approval and accountability decision-making.				3	
iii.	States a clear mission for quality authorizing and develops goals and timely plans for improvement in response to regular evaluation of its work against national and state authorizing standards.				3	
iv.	Implements policies, processes, and practices that streamline and systematize its work toward stated goals and executes its duties efficiently.					4
v.	Makes authorizing decisions that are likely to result in positive student outcomes, based on an accumulation of evidence, data, and expertise, and in accordance with state law.				3	
Standard Rating						3.4

Evaluative Comments:	
i.	A board retreat presentation from 2023, new board member session agendas, and a section on the quality authorizing standards within board policy demonstrate that the authorizer’s decision-makers and leaders are trained on the quality charter authorizing standards. Additionally, professional development trackers demonstrate a commitment to the quality authorizing principles and standards for authorizing staff with attendees, dates, and training topics included.
ii.	Board policy requires submission of a disclosure form for any board member with “personal interests in matters that affect or would lead a reasonable person to infer that it would affect the exercise or discretion of an official or employee” and a code of conduct board policy addresses relationships, funding, and lines of authority for board members. While the documentation included a conflict of interest (COI) policy that requires staff to complete a disclosure form annually, signed forms for authorizing staff were not provided.
iii.	The authorizer’s larger local education agency (LEA) mission statement and authorizing vision sets a goal of ensuring its charters “are in the top 25% of schools in Tennessee”. Additionally, the LEA’s academic strategic plan establishes a goal of strengthening the connection “between district-run schools and charter schools” through sharing best practices, and authorizer reports include charter portfolio goals for performance. However, while the authorizer provided its self-assessment that was completed during a non-evaluation year, there is no further evidence of developing improvement plans related to any evaluation of its work against authorizing standards.

- iv. Application materials, renewal decisions, revocation actions, site visit documentation, intervention notices, email communication, and annual reports document the authorizer's implementation of its policies and processes outlined in board policy 1011 and echoed in its guidebook. Additionally, reference guides and online submission portals streamline and systematize the work to ensure efficiency.
- v. Documentation related to new charter application decisions, amendment petitions, renewal decisions, and a revocation decision within the review term demonstrate that the authorizer makes some evidence-based decisions that are likely to result in positive student outcomes; however, in review of the authorizer's appeal history, the Tennessee Public Charter School Commission voted to overturn three (3) out of seven (7) of the decision-makers denials that occurred within the review term.

Standard 1b - Human Resources	0	1	2	3	4
Sub-standards					
i. Through intra- or inter-agency collaborations, contractual relationships and/or staff, enlists competent staff with relevant expertise for all areas essential to charter school oversight—including, but not limited to, education leadership; instruction and 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. Demonstrates an on-going commitment to developing and retaining authorizing staff members and provides regular professional development for the authorizer’s leadership and staff to achieve and maintain high standards of professional authorizing practice and to enable continual agency improvement.					4
iii. Ensures authorizing is visible and the people responsible for day-to-day authorizing functions have clear opportunities to provide input with leadership and decision-makers and input is given significant weight in decision-making.					4
Standard Rating					4
Evaluative Comments:					
i. Resumes, job descriptions, an organizational chart, and authorizer fee reports document the authorizer enlists competent staff with relevant expertise for all areas essential to charter school oversight. ii. The authorizer demonstrates an on-going commitment to developing and retaining several members of the authorizing staff and leadership through regular professional development, as made evident by its professional development trackers and documentation of onboarding communication for new staff. iii. The guidebook and a point of contact list developed for schools demonstrate that the authorizer ensures authorizing is visible to its charter schools, and school leaders affirmed that they know how to get in touch with the authorizing staff when questions arise. School leaders also positively noted that emails are typically responded to within 24 hours. Additionally, as documented through board meeting materials, retreat presentations, and one-on-ones with board members, authorizing staff has clear opportunities to provide input with leadership and decision-makers.					

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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 law, including all relevant requirements for use of the authorizer fee.					4
ii.	Deploys funds effectively, transparently, and efficiently with the public and student interests in mind.					4
iii.	Annually reports the authorizing obligations fulfilled using the authorizer fee in accordance with state law.					4
Standard Rating						4

Evaluative Comments:	
i.	The authorizer fee reports, authorizing office budgets, and documentation of budget meetings make evident that the authorizer determines the financial needs of the office that is commensurate with the scale of its portfolio and uses 100% of the collected authorizer fee funds to fulfill several of its authorizing responsibilities, such as for full-time employee salaries, contracted services, and training, in accordance with state law.
ii.	Authorizer fee reports and authorizing office budgets detail the authorizer’s efficient and effective use of over \$1,800,000 in authorizer funds. Additionally, a screenshot of the authorizer’s website, sample email communication with charter leaders, and a screenshot of reports shared via a file-sharing platform demonstrate that the authorizer reports its use of funds transparently with its schools and the public.
iii.	Two (2) authorizer fee reports contain clear descriptions for the use of funds (i.e., salaries and wages, staff development, contracted services) and the amounts collected per authorized charter school. E-mail communication regarding the submission of the fee report to the Department of Education make evident that the authorizer annually reports its authorizing obligations fulfilled by the authorizer fee in accordance with law.

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Standard 2a - Proposal Information, Questions, and Guidance		0	1	2	3	4
Sub-standards						
i.	Develops and issues a charter application information packet or request for proposals (RFP) that: <ul style="list-style-type: none"> a) States the authorizer’s mission and any chartering priorities the authorizer may have established; b) Provides the state’s required comprehensive application and rubric to elicit the information needed for rigorous evaluation of applicants’ plans and capacities; and c) Communicates clear guidance, requirements and timelines with prospective operators regarding the application content and format, while explaining evaluation criteria. 					4
Standard Rating						4
Evaluative Comments:						
i.	The Educational Priorities Document/Rubric (EPDR) provides prospective charter applicants with information regarding the authorizer’s chartering priorities and needs organized by neighborhood. Screenshots of the authorizer’s website make evident that the authorizer publicly posts the EPDR as well as links to the state’s required application and rubric, and provides additional application guidance, such as application timelines and videos titled “What is a charter school?” and “Charter Schools FAQs” on its website. In addition, the authorizer offers applicant overview sessions to applicants following the submission of a letter of intent, which discusses application and submission requirements as well as evaluation criteria.					

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Standard 2b - Fair, Transparent, Quality-focused Process		0	1	2	3	4
Sub-standards						
i.	Implements a charter application process that is defined in policy, open, well-publicized, and transparent, and is organized around clear, realistic timelines.					4
ii.	Allows sufficient time for each stage of the application and school pre-opening process to be carried out with quality and integrity and explains how each stage of the application process is conducted and evaluated.					4
iii.	Engages, for both written application reviews and applicant interviews, highly competent teams of internal and external evaluators with relevant academic, 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 of standards, practices, and the fair and unbiased treatment of all applicants.					4
Standard Rating						4

Evaluative Comments:

i.	The authorizer implements a charter application process that is generally outlined in board policy 1011 (i.e., approval of an application review team, rubric and scoring criteria), with additional information included in email communication with selected schools A and B, and a process overview training for applicants that details application steps (i.e., initial application submission, capacity interview, board vote, appeal) and required timelines. Furthermore, application materials are publicly available on the authorizer’s website, as documented via a screenshot, and accessible to all applicants.
ii.	Documentation for selected schools A and B, such as email communication detailing each stage of the process and capacity interviews scheduled in accordance with communicated timelines, demonstrate that the authorizer allows sufficient time between each stage and explains how each stage is conducted and evaluated.
iii.	As required in its board policy and confirmed upon review of team member resumes and application assignments for selected schools A and B, the authorizer engages teams of internal and external evaluators with relevant academic, organizational, financial, and legal expertise. Additionally, at least one (1) member of each review team for the selected schools had extensive charter school experience, thus demonstrating an understanding of charter school autonomy and accountability.
iv.	The review team training decks for the initial and amended application reviews from the 2022 application cycle included an opportunity to practice reviewing and scoring application materials, and training attendance sheets and email communication demonstrate that the authorizer provides training to its review team to ensure consistent evaluation of standards and practices. Additionally, the authorizer requires completion of a COI form from all review team members to ensure the fair and unbiased treatment of applicants.

Standard 2c - Rigorous Approval Criteria Sub-standards	0	1	2	3	4
<p>i. Utilizes the state’s required application and rubric which:</p> <ul style="list-style-type: none"> a) 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 and students with diverse needs, effective governance and management structures and systems, founding team members demonstrating diverse and necessary capabilities in all phases of the school’s development; b) Establishes distinct requirements and criteria for applicants who are existing school operators or replicators including: <ul style="list-style-type: none"> 1. Clear evidence of their capacity to operate new schools successfully while maintaining quality in existing schools; 2. Documentation of their educational, organizational, and financial performance records based on all existing schools; 3. Explanation for any never-opened, closed, revoked, or non-renewed schools (including closed, revoked or non-renewed third-party contracts to operate schools); 4. Presentation of their growth plan, business plan, and most recent financial audits; 5. Evidence of meeting high standards of academic, organizational, and financial success to earn approval for replication; and 6. Document any current or past litigation and the resolution of such litigation. c) Establishes distinct requirements and criteria for applicants proposing to contract with educational service providers (ESPs), including charter management organizations by requiring applicants to provide: <ul style="list-style-type: none"> 1. Evidence of the service provider’s educational and management success; 2. A description of the process for selecting the ESP; 3. 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 					4

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<p>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</p> <p>4. 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.</p> <p>d) Considers diverse educational philosophies and approaches.</p> <p>e) Requires applicants to demonstrate capacity to serve students with diverse needs, including students with disabilities or learning exceptionalities, English learners, at-risk students, and gifted students.</p>					
<p>ii. Requires all applicants to participate in a capacity interview to elicit evidence-based explanations which allow the applicant to demonstrate clear evidence of capacity to execute its plan successfully.</p>					4
Standard Rating					4

Evaluative Comments:

- i. The authorizer's use of the state's charter school application and scoring rubric for selected schools A and B, as required, make evident its use of the rigorous approval criteria cited in this sub-standard.
- ii. As demonstrated by capacity interview documentation for selected schools A and B, including attendance sheets, email communication with the applicant, questions and notes documents, and recordings, the authorizer requires applicants to participate in a capacity interview to demonstrate evidence of capacity to execute its plan. Topics discussed during the capacity interviews included implementing the academic plan, serving special populations, and facilities plans.

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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.			2		
ii.	Rigorously evaluates each application through thorough review of the written proposal, a substantive in-person interview with each qualified applicant, and all appropriate due diligence to examine the applicant's experience and capacity.					4
iii.	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 applicants, the reviewers, and the decision makers.				3	
iv.	Promptly notifies applicants of its application decision, explaining in writing any available rights of legal or administrative appeal through which a school may challenge the authorizer's decision and including written explanation of the evidence-based 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.					4
v.	Does not make application decisions on the basis of political or community pressure.				3	
Standard Rating						3.2
Evaluative Comments:						

- i. Documentation for selected schools A and B demonstrate that the authorizing staff and appointed review team utilized the state's required scoring rubric to develop a recommendation for denial of both applications based on a lack of demonstrated competence and capacity to succeed in all aspects of their respective school models. However, the authorizer's decision to deny selected school A was overturned by the state's appellate body. Furthermore, a board meeting recording of the decision for selected school B revealed that the decision-makers' vote to approve the application against the recommendation of staff and leadership was made without a clear understanding of what would happen to the school should the application be denied and neither the recording nor the decision letter included evidence that the decision was made in accordance with the stated approval criteria.
- ii. Board presentation materials, team member rubrics, summary documents, capacity interview notes, and conducted due diligence (i.e., neighborhood analysis, fiscal impact report) for selected schools A and B demonstrate that the authorizer rigorously evaluates each applicant's experience and capacity. While having no impact on the score, the State Board recommends that the authorizer ensures the consistent practice of rolling all individual review team member rubrics into a consensus rubric for each application.
- iii. While board ethics policies outline the expectations and requirement to submit a disclosure form only if personal interests exist for decision-makers, the authorizer's application review process requires the completion of COI statements for all review team members and signed COI statements were only provided for 15 of the 18 reviewers for selected school A and 12 of the 18 reviewers for selected school B.
- iv. Initial and amended application decision letters dated within five (5) business days of the board vote for selected schools A and B demonstrate that the authorizer promptly notifies applicants of its decision. Decision letters included next steps, an explanation of the right to an appeal, and a link to the board meeting documents which included consensus rubrics stating the evidence-based reasons weighed in the decision.
- v. As documented in a recording of the board meeting in which the board considered the amended application for selected school B, the authorizing staff and leadership recommended denial of the application and the board voted to approve the application. While the decision-makers are not bound by the recommendation of staff, neither the discussion held during the meeting nor the decision letter included the reasons for the decision; therefore, whether the decision was made based solely on political or community pressure cannot be ascertained.

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Standard 3a - Charter Agreement Negotiation, and Execution		0	1	2	3	4
Sub-standards						
i.	Executes a charter agreement between the authorizer and a legally incorporated governing board independent of the authorizer.			2		
ii.	Ensures mutual understanding and acceptance of the terms of the charter agreement by the school's governing board.			2		
Standard Rating						2
Evaluative Comments:						
i.	While the charter agreement for selected school C is signed by the governing board and dated December 18, 2021, the agreement was not signed by the authorizer until August 2023. Additionally, the charter agreement for selected school D included an effective date from 2011 with signatures from the authorizer and the governing board dated from 2021.					
ii.	Documented email communication between the authorizer and selected school D demonstrates that the authorizer sent the charter agreement to the school prior to execution; however, the email stated, "the content in the contract is non-negotiable in order to maintain consistency within [the] authorized charter schools" and, thus, did not provide an opportunity for ensuring mutual understanding or acceptance of the terms (e.g., offering to discuss any questions with the school). Additionally, the documentation of ensuring understanding and acceptance of the terms for selected school C was not provided.					

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Standard 3b – Terms, Rights and Responsibilities		0	1	2	3	4
Sub-standards						
i.	Grants charter agreements for an initial term of ten operating years with the authorizer conducting a high-stakes review every five years and producing annual performance reports.				3	
ii.	Explicitly defines material terms of the charter agreement.					4
iii.	Allows – and requires charter agreement amendments for – occasional material changes to a school’s plans but does not require a formal amendment process for modifications to non-material terms of the charter agreement.					4
iv.	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; and g. State the responsibilities of the school and the authorizer in the event of school closures. 				3	
v.	Ensures that purchasing any fee-based services that the authorizer provides is explicitly not a condition of charter approval, continuation, or renewal.					4
vi.	For any fee-based services that the authorizer provides, the authorizer develops a separate services agreement that respects charter school autonomy and treats the charter school equitably compared to district schools, if applicable.	N/A				

Standard Rating

3.6**Evaluative Comments:**

- i. While section 4 of the charter agreements for selected schools C and D state, “This agreement shall be for a term of 10 years, commencing on the effective date [...]”, there is no effective date entered for selected school C. Section 7 of the charter agreements for selected schools C and D define the authorizer’s annual evaluation and 5-year interim review of the charter school.
- ii. Material terms are defined throughout the agreements for selected schools C and D, such as section 3(e) “enrollment”, section 6(b) “roles and responsibilities of charter school”, and section 8 “operation of charter school’s educational program”, and in the approved applications, which are attached as Exhibit A and incorporated by reference.
- iii. Section 18 of the charter agreements for selected schools C and D state that the governing body may petition the authorizer to amend the agreement. Additionally, material changes that require a formal amendment are included throughout the agreement, including the addition or removal of grade levels in section 3(f), changes in enrollment in section 3(e), change to location in section 3(c), and changes to the academic focus in section 3(b). While having no impact on the score, the agreements must at minimum cite all material changes stated in rule to fully satisfy the standard in all future evaluations. Furthermore, the authorizer must be cautious of requiring approval for changes to items that are traditionally part of school autonomy, such as curriculum and minor revisions to governing body bylaws.
- iv. While most of the seven (7) areas of the sub-standard are addressed in the charter agreements for selected schools C and D, the agreements do not define the standards, criteria, and conditions for intervention.
- v. The charter agreements for selected schools C and D include options to contract with the authorizer for services, such as for transportation or food service, and a reference to T.C.A. 49-13-112 which ensures that the requirement to pay for services is not a condition of approval. While having no impact on the score, it is recommended that the charter agreement includes explicit language stating that contracting with the authorizer for services is not a condition of charter approval, continuation, or renewal.
- vi. N/A – Selected schools C and D do not currently have any fee-based service agreements with the authorizer.

Standard 3c - Performance Standards Sub-standards	0	1	2	3	4
i. Executes charter agreements with a performance framework incorporated in the agreement, commonly as an attachment, that plainly establishes the standards under which schools will be evaluated and includes: <ul style="list-style-type: none"> a. Objective and verifiable measures of student achievement as the primary measure of school quality, in accordance with state law; b. Clear, measurable, and attainable academic, financial, and organizational performance standards and targets that the school must meet as a condition of renewal, including but not limited to state and federal measures; c. Expectations for appropriate access, education, support services, and outcomes for students with disabilities; 				3	
ii. The performance framework includes clearly defined and measurable indicators, measures, metrics, and targets that: <ul style="list-style-type: none"> a) Academic Performance <ul style="list-style-type: none"> 1. Define the sources of academic data that will form the evidence base for ongoing and renewal evaluation; 2. Set expectations for student academic achievement status or proficiency, including comparative proficiency; 3. Set expectations for student academic growth, including adequacy of growth toward state standards; 4. Incorporate state and federal accountability systems, including state grading and/or rating systems; 5. Set expectations for postsecondary readiness, including graduation rates (for high schools); and 6. 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. b) Financial Performance <ul style="list-style-type: none"> 1. Define the sources of financial data that will form the evidence base for ongoing and renewal evaluation, including the school's annual financial audit conducted by a qualified independent auditor; 				3	

<p>2. Enable the authorizer to monitor and evaluate the school’s financial stability and viability based on short-term performance; and</p> <p>3. Enable the authorizer to monitor and evaluate the school’s long-term financial sustainability.</p> <p>c) Organizational Performance</p> <p>1. Define the sources of organizational data that will form the evidence base for ongoing and renewal evaluation;</p> <p>2. Define the essential elements of the educational program for which the authorizer will hold the school accountable;</p> <p>3. Define financial management and oversight standards based on generally accepted accounting principles;</p> <p>4. Hold school governing boards accountable for meeting statutory and board-established operating and reporting requirements;</p> <p>5. Ensure school compliance with student and employee rights and obligations; and</p> <p>6. Establish expectations related to the school environment, including health and safety, transportation, facilities, and appropriate handling of records.</p>					
Standard Rating					3
<p>Evaluative Comments:</p> <p>i. While section 7 of the charter agreements for selected schools C and D names the school performance framework and scorecards as the primary measure of school quality and states that the performance framework and scorecards shall be used as the basis for the authorizer’s decision to renew, the framework is neither incorporated by reference or as an attachment to the agreements.</p> <p>ii. While most of the indicators for academic, financial, and organizational performance required by this sub-standard are included, there is no evidence of an option for mission-specific performance measures.</p>					

Standard 3d - Provisions for Educational Service Provider (ESP) (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, provisions within the charter agreement 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				
ii. Reviews the proposed ESP contract with the charter school’s governing board to ensure that it is consistent with applicable law, authorizer policy and the public interest, and requires, prior to contract execution, the contract between the ESP and the charter school’s governing board to articulate: <ol style="list-style-type: none"> a. The roles and responsibilities of the school governing board and the ESP, including all services to be provided under the contract; b. The performance measures, consequences, and mechanisms by which the school governing board will hold the SEP accountable for performance, aligned with the performance measures in the charter agreement; c. All compensation to be paid by the ESP, including all fees, bonuses, and what such compensation includes or requires; d. Terms of any facility agreement that may be part of the relationship; e. Financial reporting requirements and provisions for the school governing board’s financial oversight; f. 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				

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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<ul style="list-style-type: none"> g. 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; h. Provisions for contract termination; and i. 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:		
<p>This standard is N/A. Selected schools C and D do not contract with an educational service provider.</p>		

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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, outlined in policy, 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.					4
iv.	Solicits feedback from its schools and utilizes the results to provide clear technical guidance to schools as needed to ensure timely compliance with applicable rules and regulations.					4
v.	Conducts at least one formal on-site review to each school annually, uses the evidence collected to inform the school's annual evaluation, and provides schools with a report summarizing the review.				3	
vi.	Proactively communicates the purpose of any proposed on-site visit and ensures visits are used 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
vii.	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.				3	
Standard Rating						3.71
Evaluative Comments:						

- i. The charter agreements for selected schools E and F and board policy 1011 generally define an annual performance monitoring process that utilizes the outcomes on the annual performance framework scorecards as factors in the authorizer’s renewal and revocation decisions. Additionally, the guidebook, operations scorecard tracker, and a screenshot of the authorizer’s Title I compliance monitoring system demonstrate further definition of its monitoring system and documents the authorizer’s collection of compliance information. Furthermore, intervention notices and email communication demonstrate how the authorizer uses its compliance and monitoring system to inform intervention decisions.
- ii. The authorizer defines and communicates its process, methods, and timing of gathering school performance and compliance data through its scorecard reference guides, which include all reporting requirements, deadlines, resources, and submission guidance, and communicates regular reminders via weekly newsletters and emails. The guidebook also provides further details about reporting school performance and compliance data through outcomes on its annual performance framework scorecards.
- iii. Evidence of the authorizer implementing annual routines within its accountability system include annual reports, which share outcomes for each school on its performance framework scorecards, and site visit documentation, which involve a review of school data. In addition, the guidebook and reference guides include streamlined reporting submissions timelines that occur in September, January, and June. Furthermore, school leaders affirmed that the authorizer effectively streamlines requirements to minimize administrative reporting burdens.
- iv. Survey responses following the authorizer’s annual summer charter leader institute as well as its mid-year and end-of-year surveys document the authorizer’s solicitation of feedback from schools. The authorizer utilizes the feedback to determine upcoming training topics such as a finance summit and technical guidance for a new statewide operating platform. Additionally, the authorizer provides compliance-related guidance to schools as documented by agendas for meetings and trainings with charter school leaders.
- v. Two (2) site visit presentation templates provided by the authorizer and populated by the selected schools and a chain of email communication regarding the scheduling document the authorizer’s implementation of a formal on-site review to each school annually. In addition, the authorizer explained in the document debrief how it uses data from its scorecards to inform the types of classroom observations it conducts during site visits. However, while documentation of site visit feedback for selected schools E and F from 2022 was submitted, the documentation did not include evidence of providing feedback during site visits in 2021.
- vi. Email communication and the summer charter leader institute document the authorizer’s communication regarding the frequency, general purpose, methods, and data to be collected ahead of its annual site visit. Additionally, the authorizer’s authority to conduct on-site visits is stated in section 7e of the charter agreements for selected schools E and F. While having no impact on the score, the authorizer explained in the document debrief how it uses data from its scorecards to inform the types of classroom observations it conducts during site visits, and this explanation should be added to its site visit communication.
- vii. Completed performance scorecards for selected schools E and F demonstrate the authorizer’s annual evaluation of its schools. An annual audit tracking document makes evident that the authorizer monitors school progress toward meeting the standards and targets in the charter agreement. However, communication evidence for the 2021 scorecards was not provided, and submitted documentation shows that only notices of deficiency emails were provided to board chairs, not the scorecards themselves.

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Standard 4b - Respecting School Autonomy		0	1	2	3	4
Sub-standards						
i.	Respects the school’s authority over its day-to-day operations by refraining from directing or participating in educational decision or choices that are within a school’s purview under the charter law or contract and does not conflict with the authorizer’s additional responsibilities as the local education agency.					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.					4
iii.	Regularly 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	
Standard Rating						3.6
Evaluative Comments:						
i.	Weekly email communication with statements such as, “Charters are autonomous and should review their own, board approved, policies if they meet the states requirements” and, “As charters have the autonomy to calendar these assessments according to the needs of each school” demonstrate that the authorizer respects and reiterates its schools’ authority over its day-to-day operations. Additionally, the authorizer conducts mid-year and end-of-year surveys with a question specific to respecting school autonomy to regularly evaluate whether it is refraining from educational decisions within a school’s purview. School leaders affirmed these practices.					
ii.	The guidebook and reference guides include details about the authorizer’s documentation submission portals for data collection that minimizes administrative burden and are communicated to schools at the start of each school year to ensure information is collected with sufficient detail and timeliness.					
iii.	The mid-year and end-of-year survey questions evaluate the authorizer’s goal of recognizing school autonomy; however, while the narrative describes reaching out to schools that rated the autonomy question below a three (3), no further documentation or evidence was provided to demonstrate that the authorizer utilizes the results to assess the potential to increase school autonomy, such as through a follow-up email or a charter leader meeting agenda that demonstrates this practice.					

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.				3	
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, at-risk students, and gifted students.			2		
iii.	Ensures clarity in the roles and responsibilities of all parties involved in serving students with disabilities.				3	
iv.	Ensures that schools' student discipline policies and actions are legal, fair, and equitable and that no student is suspended, expelled, or counseled out of a school outside of that process, and that schools have a clear process for addressing parent/community grievances.			2		
Standard Rating						2.5

Evaluative Comments:	
i.	While email communication between the authorizer and the Department of Education and a certification tracker demonstrates that the authorizer tracks submission of an annual lottery certification for its charter schools, the documentation did not include additional compliance reviews beyond the lottery certification, such as reviewing a charter school's enrollment application, current handbook/policies, and/or enrollment requirements to ensure alignment with law.
ii.	Through annual data collection and indicators on the operations framework scorecard, the authorizer ensures that schools provide equitable access and services to English learners and students with disabilities; however, the documentation does not make evident how the authorizer ensures equitable access and services to students in foster care, migrant students, gifted students, or at-risk students. Only English learners, students with disabilities, and homeless students are explicitly evaluated via the scorecard.
iii.	While the charter agreement outlines the requirement for the charter school to hire highly qualified special education teachers, comply with laws, and immediately remedy any unequal treatment of students and job descriptions detail authorizing staff responsibilities, no further evidence was provided demonstrating that the authorizer ensures clarity in the roles and responsibilities of the authorizer and the charter school in serving students with disabilities, such as through communication with schools. School leaders also shared examples of instances where the roles and responsibilities were unclear.

- iv. While the authorizer's documentation included handbooks for selected schools E and F and evidence of offering discipline support to its schools, the documentation did not make evident that the authorizer ensures student discipline policies are legal, fair, and equitable and that schools have a clear process for addressing parent/community grievances, such as by conducting a school policy review, including relevant indicators on the performance framework, or incorporating document checks into its site visit process. The authorizer noted that, while school handbooks are collected, they are only reviewed when an issue arises, but no documentation to support this practice was provided. Given the large portfolio of schools, the authorizer could consider a cadence of audits to ensure schools' policies are fair, legal, and equitable.

Standard 4d - School Intervention		0	1	2	3	4
Sub-standards						
i.	Establishes and clearly communicates to schools at the outset an intervention and problem-solving policy that states the general conditions that may trigger intervention and the types of actions and consequences that may ensue.				3	
ii.	Utilizes ongoing oversight and evaluation processes to determine when intervention in non-emergency situations is needed.					4
iii.	Provides clear, evidence-based, and timely notice of contract violations or performance deficiencies that are aligned to the intervention policy and is communicated to the school leaders and governing board.				3	
iv.	Allows schools reasonable time and opportunity for remediation in non-emergency situations.					4
v.	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.				3	
Standard Rating						3.4

Evaluative Comments:

i.	While the guidebook includes sample intervention notification letters and the general conditions that may trigger intervention and the authorizer's board policy 1014 provides further information regarding the conditions and types of actions and consequences that may ensue, the submitted policy is in draft form and was not finalized by the deadline required in law. During the school leader interview, school leaders did affirm that the intervention policy has since been finalized.
ii.	Formal notices regarding non-compliance issues related to academic performance, enrollment, immunizations, IDEA violations, and data collection, as well as a revocation during the review term, demonstrate that the authorizer utilizes its oversight and evaluation processes to determine when intervention is needed.
iii.	As demonstrated through various formal notices issued within the review term, the authorizer provides clear, evidence-based, and timely notice of contract violations or performance deficiencies. However, the documentation did not include evidence that all intervention notices were communicated to both the governing board chair and school leader.
iv.	Formal notices submitted by the authorizer specifically detail next steps and reasonable time and opportunity for issue resolution.
v.	Documentation of formal notices issued by the authorizer during the review term demonstrate that the authorizer preserves school autonomy and responsibility (i.e., a corrective action plan with action steps developed by the school, offering training supports); however, though some notices clearly state possible consequences for noncompliance (i.e., "Failure to remedy these performance deficiencies may result in the Office of Charter Schools bringing a recommendation to the Memphis Shelby County Schools Board of Education to revoke the school's charter agreement"), not every notice includes possible consequences, such as escalation within the intervention protocol, should the non-compliance continue.

Standard 4e - Public Reporting		0	1	2	3	4
Sub-standards						
i.	Produces and communicates to its decision-makers, charter school leaders, and the public an annual authorizer report that: <ul style="list-style-type: none"> a. Provides clear, accurate performance data for the charter schools it oversees; b. Reports on individual school and overall portfolio performance according to the framework set forth in the charter agreement in accordance with state law; and c. Reports on the authorizer’s performance in meeting its goals. 					4
Standard Rating						4
Evaluative Comments:						
i. As documented by the authorizer’s 2020-21 and 2021-22 annual reports, the authorizer produces an annual report that provides performance data for its schools and reports on the individual and overall performance outcomes according to its performance framework. Additionally, in response to feedback on the content of its annual report, the most recent report includes a reflection on progress toward its authorizing goals. Email communication, a screenshot of the authorizer’s website, and board presentation materials demonstrate that the annual reports are communicated with decision-makers, school leaders, and the public.						

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Standard 5a – Amendments to the Charter Agreement		0	1	2	3	4
Sub-standards						
i.	Establishes and clearly communicates to schools an amendment process that’s aligned to the charter agreement and state law, utilizes the state’s required application, and follows the state’s required timeline and approval criteria.					4
ii.	Promptly notifies a school of its amendment decision, including written explanation of the evidence-based reasons for the decision and explains in writing any available rights of legal or administrative appeal through which a school may challenge the authorizer’s decision.				3	
iii.	Grants amendments only to schools with a petition that demonstrates alignment to the school’s mission and goals and provides specific, evidence-based information that shows thorough preparation and viability of the plan.				3	
iv.	Does not make revocation decisions on the basis of political or community pressure.				3	
Standard Rating						3.25

Evaluative Comments:

i.	Section 18 of the charter agreements for selected schools G and H allow the agreements to be amended, and the guidebook outlines the process for submitting an amendment petition in accordance with state law. The guidebook also includes a copy of the state’s required application, follows the state’s required timeline, and includes the approval criteria. The guidebook is annually shared with charter schools, and the authorizer includes upcoming submission deadline reminders in its email communication, as documented by screenshots of its weekly newsletter.
ii.	Decision letters for selected schools G and H demonstrate that the authorizer promptly notifies a school of its amendment decision within five (5) business days; however, the evidence-based reasons for the approval decisions were not included in the written notifications.
iii.	Completed amendment petition rubrics for selected schools G and H and a board meeting presentation deck document the authorizer’s thorough review of each petition in accordance with the state’s required approval criteria as well as alignment with the authorizer’s board policy and outcomes on its performance framework. However, while the authorizing staff and leadership recommended the denial of the amendment petition for selected school G due to the petition’s lack of alignment with the school’s mission, poor academic results, and a lack of thorough preparation, the decision-makers granted the amendment without clear rationale or acknowledgement that the petition did not meet several of the state’s approval criteria or its own policy.
iv.	While the decision-makers are not bound by the recommendation of staff, neither the discussion held during the board meeting which considered the amendment petition for selected school G nor the decision letter included the reasons for the decision; therefore, whether the decision was made based solely on political or community pressure cannot be ascertained.

Standard 5b - Renewal Process		0	1	2	3	4
Sub-standards						
i.	Conducts a high-stakes interim review of each school in the fifth year of the current charter term and clearly communicates the results to the school in accordance with Department of Education guidelines.				3	
ii.	Provides to each school, in advance of the renewal decision using the timeline specified in state law, 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. 				3	
iii.	Allows the school 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.					4
iv.	Requires any school seeking renewal to complete the state’s renewal application and follows the renewal application timeline required in state law.					4
Standard Rating						3.5

Evaluative Comments:	
i.	The charter agreements for selected schools I and J as well as board policy 1011 require a high-stakes interim review in the fifth year of the current charter term. The guidebook provides further details about the process, which is aligned to the Department of Education’s guidelines, and email communication and interim reports for selected school J demonstrates that the authorizer clearly communicates the results of the interim review. However, evidence of communicating the results of the interim review to selected school I was not provided. While having no impact on the score, the authorizer should ensure its current interim report template aligns with what is in the current guidebook.
ii.	Email communication between the authorizer and selected schools I and J make evident that the authorizer provides its schools with a cumulative report in advance of a renewal decision. However, while the cumulative reports for selected schools I and J demonstrate that the authorizer summarizes the school’s performance record over the charter term and states the summative findings, the reports do not state prospects for renewal.
iii.	Screenshots of an online grievance form demonstrate that the authorizer provides opportunity for its schools to respond to the cumulative report, and email communication demonstrates that the authorizer allows sufficient time – three (3) weeks – for schools to respond.
iv.	The guidebook, renewal application materials, and email communication with selected schools I and J demonstrate that the authorizer requires schools seeking renewal to complete the state’s required application and that the process follows the state’s renewal timeline.

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Standard 5c - Renewal Decisions Based on Merit and Inclusive Evidence		0	1	2	3	4
Sub-standards						
i.	Establishes 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 consistent with the charter agreement and state law, including any policy changes thereto.					4
ii.	Defines and communicates with its schools the criteria for renewal and non-renewal decisions that are consistent with the charter agreement.				3	
iii.	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.				3	
iv.	Promptly notifies a school of its renewal decision, including written explanation of the evidence-based reasons for the decision and any available rights of legal or administrative appeal through which a school may challenge the authorizer’s decision.				3	
v.	Promptly communicates renewal decisions to the school community and public within a time frame that allows parents and students to exercise choices for the upcoming school year.					4
vi.	Does not make renewal decisions on the basis of political or community pressure or solely on promises of future improvement.				3	
Standard Rating						3.33
Evaluative Comments:						

- i. Board policy 1011 includes a renewal policy that requires an analysis of a school's comprehensive body of evidence (i.e., renewal application, cumulative performance report, outcome of renewal site visit, scores on the performance framework) and, in the event of a recommendation to non-renew, requires the decision-makers to conduct an informal renewal hearing publicly. The policy is consistent with the charter agreements for selected schools I and J and with state law and is communicated to schools through the annual publication of its guidebook.
- ii. As documented by a charter renewal overview presentation, the authorizer meets with schools entering the renewal process to define the criteria for renewal and non-renewal decisions; however, the presentation states that only schools with performance framework outcomes that fall in the 3.0-5.0 range are recommended for renewal and does not make evident how additional renewal evaluation criteria required in its board policy and in law, such as an analysis of the renewal application, factor into the renewal decision.
- iii. The renewal report, board meeting presentation materials, and decision letter for selected school I demonstrate that the authorizer grants renewal to schools that have achieved the standards and targets set forth in the charter agreement, are organizationally and fiscally viable, and have been faithful to the terms of the agreement and applicable law. Additionally, though the authorizing staff and leadership recommended non-renewal for selected school J because it did not meet the same criteria as selected school I, a recording of the board meeting in which the evidence was considered revealed that the decision-makers voted to renew selected school J, and neither the recording nor the decision letter demonstrate the reasons for the decision.
- iv. Decision letters dated within 10 days of the decision make evident that the authorizer promptly notified selected schools I and J of its decision to renew; however, the written notification does not include the evidence-based reasons for the decision.
- v. Board documentation and screenshots demonstrate that the authorizer publicly communicates its board meeting minutes, board materials, and renewal decisions via its website.
- vi. While the decision-makers are not bound by the recommendation of staff, neither the discussion held during the meeting in which the renewal of selected school J was considered, nor the decision letter included the reasons for the decision; therefore, whether the decision was made based solely on political or community pressure cannot be ascertained.

Standard 5d - Revocation		0	1	2	3	4
Sub-standards						
i.	Establishes and clearly communicates a revocation policy with criteria for charter revocation decisions that are consistent with the charter agreement and state law, including any policy changes thereto.				3	
ii.	Revokes a charter during the charter term only if there is clear violation in accordance with the reasons set forth in state law.					4
iii.	Promptly notifies each school of its revocation decision, including written explanation of the reasons for the decision and any available rights of legal or administrative appeal through which a school may challenge the authorizer's decision.					4
iv.	Promptly communicates revocation decisions to the school community and public within a timeframe that allows parents and students to exercise choices for the upcoming school year.					4
v.	Does not make revocation decisions on the basis of political or community pressure.					4
Standard Rating						3.8

Evaluative Comments:

- i. While board policy 1011 and the guidebook outline the grounds for revocation, the grounds do not align across the two (2) documents, and it is unclear which document would be prioritized in a revocation. In addition, the board policy lists the grounds for non-renewal and revocation together and it is unclear which of the grounds apply to one or both processes. The board policy also cites "egregious acts of malfeasance" as a reason for revocation which does not align with reasons set forth in law unless these acts are intended to fall under emergency situations stated in T.C.A. § 49-13-122(d), in which case this should be clearly stated in the policy. Furthermore, the guidebook includes "performing any of the acts that are conditions for non-approval of the charter school under T.C.A. § 49-13-108(c)" as a reason for revocation in its decision matrix, which is not a permissible ground for revocation set forth in law. The authorizer must explicitly align its board policy to law and update its guidebook to reflect these changes.
- ii. As documented by a notice of investigation, a 30-day notice of a revocation recommendation, board presentation materials, and board meeting minutes, the decision-makers revoked the charter agreement for selected school K due to material violations of the charter agreement and failing to meet generally accepted standards of fiscal management. Furthermore, though selected school K appealed the authorizer's decision to the state's appellate body, the authorizer's decision was upheld.
- iii. A decision letter to the board chair for selected school K dated two (2) days after the board's decision to revoke the charter agreement included the reasons for the decision and the available rights to an appeal.

- iv. Letters and robo call scripts document the authorizer's ongoing communication with parents and families throughout the revocation process for selected school K, including notice of its recommendation to revoke, details regarding its public hearings, and the final revocation decision. Additionally, board materials, including findings from the Tennessee Comptroller of the Treasury, and the outcome of the board's vote, were made available to the public via the board's website.
- v. The decision to revoke the charter agreement of selected school K was in alignment with its board policy, state law, documentation presented to the board for review, and a recommendation from the authorizing staff and leadership and does not demonstrate political or community pressure having solely influenced the decision.

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Standard 5e - Closure		0	1	2	3	4
Sub-standards						
i.	Establishes and clearly communicates to schools a closure policy or procedure that is consistent with the charter agreement and requires the authorizer to oversee and work 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.	Board policy 1011 establishes a closure policy that is consistent with the charter agreement for selected school L and the requirements of this sub-standard. The policy is communicated to schools through the annual publication of the guidebook and was implemented in the closure of the selected school. Documentation of the closure included parent notification letters, transition team meeting agendas and minutes, email communication between the authorizer and the school, and a closure plan checklist which included next steps regarding student records, funds, and property. While having no impact on the score, it is recommended that the closure plan checklist is always prepared and presented at the first convening of the transition team.					