



Charter School Authorizer Evaluation Report
Hamilton County Schools
2025

About Charter School Authorizer Evaluations

In 2019, Tennessee’s 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 an authorizer evaluation process and now is recognized for its high-quality process around the country. The State Board partnered with [SchoolWorks](#), an education consulting group with experience in authorizer evaluations, to develop an evaluation system based on the State Board’s Quality Charter Authorizing Standards¹.

As part of its development process, State Board staff engaged with Tennessee charter school 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, the State Board finalized its [Rule 0520-14-01-.08](#) and [Policy 6.113](#) on charter school authorizer evaluations and began implementing the evaluation cycle in Fall 2021. The State Board’s evaluation process centers around its belief that quality authorizing leads to quality charter schools and increased educational opportunities for all students in Tennessee.

Evaluation Schedule

Authorizers are assigned to an evaluation cohort (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
Cohort 2	<ul style="list-style-type: none"> ○ Achievement School District ○ Metro Nashville Public Schools ○ Tennessee Public Charter School Commission

Evaluation Process

Authorizers are evaluated to assess authorizer compliance with the requirements of state law and the rules and regulations of the State Board, and to ensure alignment with the Quality Charter Authorizing Standards. The State Board’s evaluation rubric is 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. An authorizer’s overall rating represents a summary of outcomes across a variety of indicators within these categories.

¹ [State Board Policy 6.111](#)

Characteristics of the Process

- Each authorizer is evaluated by an evaluation team with experience in charter school authorizing or authorizer evaluations. The State Board also enlists the support of a quality editor responsible for verifying the evidence and ratings for each standard and ensuring consistency across evaluations.
- Evaluations focus on evidence from within a two (2) year review term², which includes documentation provided by the authorizer, an interview with charter school leaders from the authorizer’s portfolio of charter schools, and a documentation debrief with the authorizer. The evaluation team also considers final decisions for any appeals that occurred within the review term, as applicable.
- The evaluation team objectively evaluates the collective evidence against the evaluation rubric to determine a rating (Table 2) between zero (0) and four (4) for each standard and an overall evaluation rating (Table 3) that best represents the authorizer’s performance for that review term. The final product of each evaluation is this Evaluation Report, which includes sub-standard and standard ratings, accompanying feedback, and a final evaluation score.
- Authorizer evaluations are conducted solely by the evaluation team and represent an independent evaluation of the authorizer’s practices in relation to the State Board’s Quality Charter Authorizing Standards.
- Following approval by the State Board, the final evaluation report is provided to the authorizer and publicly posted on the State Board’s [website](#).

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

² The evaluation review term for the 2025 evaluation includes documentation from September 1, 2023 - August 31, 2025.

Executive Summary

About the Authorizer	<p>Hamilton County Schools (HCS) is the district authorizer in Hamilton County, Tennessee. HCS currently has 9 charter schools in operation serving 3,019 students, which is approximately 6% of the district’s total student population. HCS does not currently have any charter schools in development.</p>
Evaluation Summary	<p>Identified Areas of Strength</p> <ul style="list-style-type: none"> • The authorizer deploys funds effectively, transparently, and efficiently, reporting its use of collected authorizer fees via an annual report that is publicly available on its website. • The authorizer rigorously evaluates each charter school application through a thorough review of the written proposal and a substantive in-person interview with the applicant, while ensuring that its process and decision-making are free from potential conflicts of interest. • The authorizer grants charters only to new applicants that have demonstrated competence and capacity to succeed consistent with state requirements and approval criteria. <p>Identified Areas for Growth</p> <ul style="list-style-type: none"> • The authorizer’s charter agreements and supporting documentation lack clear communication of performance requirements, including the evidence utilized to determine a school’s annual evaluation, and how evaluation outcomes inform renewal, non-renewal and intervention decisions. • The authorizer must align its renewal process with requirements in law, clearly communicate its renewal criteria, and ensure implementation of all required components to inform its renewal decisions. • The authorizer lacks board-approved policies for some of its key authorizing responsibilities, including oversight and evaluation and revocation. <p>Overall Evaluation Rating</p> <ul style="list-style-type: none"> • 2.71 out of 4.0, Satisfactory <p>Required Follow Up Action</p> <ul style="list-style-type: none"> • Submission of a self-assessment in the 2026-27 school year, as required for all authorizers in a non-evaluation year

Overall Ratings Summary

Standard		Rating (0-4)
1a	Planning and Commitment to Excellence	3.2
1b	Human Resources	3.33
1c	Financial Resources	4
2a	Proposal Information, Questions, and Guidance	2
2b	Fair, Transparent, Quality-Focused Process	3.75
2c	Rigorous Approval Criteria	4
2d	Rigorous Decision Making	4
3a	Charter Agreement Negotiation and Execution	2
3b	Terms, Rights and Responsibilities	2.2
3c	Performance Standards	3
3d	Provisions for Educational Service Provider (ESP) (if applicable)	N/A
4a	Performance Evaluation and Compliance Monitoring	2.71
4b	Respecting School Autonomy	2.67
4c	Protecting Student Rights	2.25
4d	School Intervention	3.2
4e	Public Reporting	3
5a	Amendments to the Charter Agreement	3
5b	Renewal Process	1.5
5c	Renewal Decisions Based on Merit and Inclusive Evidence	2.5
5d	Revocation	1
5e	Closure	1
Overall Rating		2.71 Satisfactory

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.				3	
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.					4
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.				3	
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						3.2

Evaluative Comments:	
i.	Board training materials, regular board communication updates, national conference registrations, and professional development trackers document efforts to educate the authorizer’s decision-makers, leadership, and staff on the quality charter authorizing principles and standards. However, professional development documentation for decision-makers is limited to school year 2024-25, and documentation does not include evidence of all staff funded by the authorizer fee participating in professional development throughout the evaluation review term.
ii.	Board policy 1.107 requires officials and employees to disclose personal interests in voting and non-voting matters. Disclaimer statements recited at the start of each board meeting and conflict of interest forms signed by decision-makers and staff related to two new charter applications received during the evaluation review term demonstrate ways in which the authorizer ensures external relationships, funding structures, and lines of authority protect its functions from conflicts that might compromise its judgement in decision-making.
iii.	The authorizer’s charter handbook defines a clear mission for quality authorizing, which is to “practice rigorous charter school authorization, provide meaningful support, and protect school choice in order to uphold high academic standards, create fair and equitable opportunities, and improve outcomes for students and families in Hamilton County”, and the 2023-24 annual report identifies a goal of improving its authorizing practices related to professional development. However, the documentation does not include any other goals or clear evidence of timely plans for improvement in response to either the authorizer’s 2023 evaluation or its self-assessment completed in 2024-25.
iv.	Authorizing staff and leader meetings, ongoing communication with decision makers, intentional efforts to streamline reporting requirements using a reporting platform and updating site visit processes based on school leader feedback demonstrate the authorizer’s implementation of processes and

practices that streamline and systematize its work. However, while the authorizer has improved its processes and practices since its 2023 evaluation, there are still policies in draft form or those that need to be created (i.e., revocation, closure, oversight/monitoring) and charter school leaders noted growing pains associated with streamlining and efficiency, particularly given authorizing staff turnover.

- v. The authorizer denied two new charter applications with notable deficiencies, which demonstrates that the authorizer values evidence, data, and expertise in some decision making; however, as further detailed in standard 5c, the authorizer renewed schools during this evaluation review term without comprehensive evidence and data to inform decisions, with one school receiving a Notice of Probation for its academic performance shortly after being renewed.

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.			2		
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					3.33

Evaluative Comments:
<p>i. Resumes for staff members funded by the authorizer fee, an external consultant, and documentation of provided charter support from the district’s attorney demonstrate that the authorizer enlists competent staff with relevant expertise for all areas essential to charter school oversight.</p> <p>ii. Professional development trackers for the 2024-25 school year, training session completion emails, evidence of staff attendance and participation in development opportunities provided through the National Association of Charter School Authorizers document the authorizer’s intentional efforts in developing and retaining key authorizing staff. However, the documentation does not include evidence of all staff and leadership funded by the authorizer fee participating in development opportunities related to their authorizing responsibilities at least once over the evaluation review term. The authorizer did note in an interview, and as part of its stated goals, an increased focus in this area over the last year and the documentation supports this assertion.</p> <p>iii. Presentation materials prepared by authorizing staff for senior leadership, evidence of regular board communication regarding charter applications and performance, and evidence of authorizing staff leading board presentations demonstrate the authorizing staff’s opportunity to provide input with leadership and decision-makers. The authorizer’s handbook details the various points of contact for charter schools, and school leaders affirmed an understanding of who to contact with authorizing questions.</p>

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’s projected budgets from the 2022-23 and 2023-24 school years document its collection of \$35,000 per school, as allowable in state law, and expected use of the funds to cover its authorizing expenses, including personnel costs, membership dues, monitoring and oversight, and consulting services. While having no impact on the score, it is recommended that the authorizer includes a line item that explains how it funds additional expenses not covered by the authorizer fee.
ii.	As documented by its 2022-23 and 2023-24 authorizer fee reports and a hyperlink to the location in which the fee reports are publicly posted on its website, the authorizer deploys funds effectively by using all collected fees to cover authorizing costs and transparently reports its spending for public awareness. Additionally, the authorizer provided further explanation in its narrative demonstrating an efficient use of all funds collected and the use of additional funding sources for amounts not covered by the authorizer fee.
iii.	The authorizer’s annual fee reports from the 2022-23 and 2023-24 school years include clear descriptions of its authorizing obligations fulfilled using the collected funds, emails confirm they were submitted to the appropriate state agency for reporting purposes, and the reports are publicly available on the authorizer’s website in accordance with state law. While having no impact on the score, the authorizer must ensure that use of the authorizer fee is limited to fully or partially funded positions of district personnel or consultants with authorizer-related responsibilities (i.e., monitoring and oversight) that directly tie to the authorizer’s responsibilities outlined in its charter agreement, including indicators on its performance framework. Positions of district personnel or consultants supporting charter schools on LEA-related responsibilities, such as CTE, state assessments, and student information systems, may not be funded using the authorizer fee. Authorizers will be held to this expectation in future evaluation cycles, and the State Board will support authorizers in furthering their understanding of the differences between the role of the LEA versus that of the authorizer.

Standard 2a - Proposal Information, Questions, and Guidance Sub-standards	0	1	2	3	4
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. 			2		
Standard Rating					2
Evaluative Comments:					
i. While the authorizer’s application and authorization process document state chartering priorities, directs prospective applicants to the state’s required application materials and scoring rubric, and generally provides guidance, requirements, and timelines, the information at times conflicts with requirements provided in state law and State Board rules. For example, the document includes conflicting information about the scoring criteria by stating in one section that the state’s scoring rubric will be used and in another section states, “Schools that do not serve the best interest of the students, the district, or the community, or that lack a strong facility plan and commitment deadline, will be recommended for denial”. Additionally, the document restricts applicants from submitting applications prior to February 1, which is not in accordance with state law, and states that “loose applications, or those not in binders, will be sent back to the applicant without review”, which is not among the reasons to deny an application per State Board rules. The authorizer should also ensure language aligns across all informational documents and is updated to reflect recent legislative changes, including information provided on its website. While having no impact on the score, the authorizer is encouraged to use precise language directly from state law to avoid the potential for confusion (i.e., applicants may submit an appeal within 10 days of the authorizer’s decision, not within 10 days of the authorizer’s notification of the decision).					

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.				3	
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						3.75

Evaluative Comments:

- i. While charter school applications, consensus rubrics, and recommendation reports for the selected schools as well as hyperlinks to process documents available on the authorizer's website demonstrate the authorizer's implementation of an open and well-publicized application process, the documentation reveals concerns regarding transparency and inconsistent communication of timelines. Board policy 4.212 contains general information about the authorizer's charter application process, however, some details within the policy are out of date (i.e., reference to the TN Department of Education rather than the State Board) or incorrect (i.e., indicating December 1 as letter of intent deadline, requiring the letter of intent in the year preceding the year in which the school plans to begin operation). Additionally, the policy includes details that conflict with its application and authorization process document, such as references to charter school purposes and the number of hard copies required for submission.
- ii. Email communication and decision notices document the authorizer allowing sufficient time for each stage of the application process and providing explanations for how each stage of the process is conducted, in accordance with state law and the expectations of this sub-standard.
- iii. Resumes, recommendation reports, a hired external consultant with charter authorizing experience, and email communication between authorizing staff and legal counsel documents that the authorizer engages competent teams of internal and external evaluators with relevant expertise.
- iv. A training deck and completed conflict of interest forms for reviewers responsible for evaluating the charter applications of the selected schools demonstrate that the authorizer provides orientation to evaluators and ensures the fair, unbiased treatment of all applicants. The training deck included a practice portion to ensure consistent evaluation of standards and practices.

Standard 2c - Rigorous Approval Criteria Sub-standards	0	1	2	3	4
i. Utilizes the state’s required application and rubric which: <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

<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:					
<p>i. Applications and consensus rubrics for the selected schools make evident that the authorizer utilizes the state’s required application and scoring rubric. It is also worth noting that the authorizer proactively ensured use of the required materials by communicating with prospective applicants in advance of the letter of intent deadline regarding changes in the application materials provided by the state.</p> <p>ii. Capacity interview questions and notes with attendees listed for the selected school, as well as email communication regarding scheduling, demonstrate that the authorizer requires applicants to participate in a capacity interview to demonstrate clear evidence of capacity to execute its plan successfully.</p>					

Standard 2d - Rigorous Decision Making		0	1	2	3	4
Sub-standards						
i.	Grants charters only to applicants that have demonstrated competence and capacity to succeed in all aspects of their particular charter school model, consistent with the stated approval criteria.					4
ii.	Rigorously evaluates each application through thorough review of the written proposal, a substantive in-person interview with each qualified applicant, and all appropriate due diligence to examine the applicant’s experience and capacity.					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.					4
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.					4
Standard Rating						4
Evaluative Comments:						
i.	Review committee summary reports which recommend denial, board discussion of findings included in the summary reports, and notices of its decision to deny the applications for the selected schools demonstrate that the authorizer grants charters only to applicants that have demonstrated competence and capacity to succeed in all aspects of their model, and are consistent with the state’s required approval criteria.					
ii.	Documentation of the review committee’s evaluation of the applications for the selected schools, as well as capacity interview questions and interview notes, demonstrate that the authorizer rigorously evaluates its applications and conducts a substantive in-person interview with its applicants. Due diligence included reviewing the performance record of affiliated schools and visiting a proposed location. While not impacting the score, it is suggested that consistent due diligence process steps are clearly documented in the handbook and intentionally discussed with decision makers as part of the full application record.					
iii.	Board policy and signed conflict of interest forms from all reviewers assigned to evaluate the applications for the selected schools and decision-makers ahead of their votes demonstrate how the authorizer ensures its application review process and decision-making are free from conflicts of interest.					

- iv. Board meetings are livestreamed and recordings are publicly posted on the authorizer's website. Initial and amended decision notices for the selected schools are dated within the state's required timeline and include an explanation of the evidence-based factors for determining its decision and next steps, thus demonstrating that the authorizer promptly notifies applicants of decisions in writing, explaining any available rights to resubmit or appeal and stating the reasons for denial so that applicants can decide if they wish to revise their plans based in part on that information and resubmit in the future.
- v. The documentation does not make evident that any of the authorizer's application decisions made within the evaluation review term were on the basis of political or community pressure.

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.				3	
ii.	Ensures mutual understanding and acceptance of the terms of the charter agreement by the school's governing board.		1			
Standard Rating						2
Evaluative Comments:						
i.	While the charter agreements for selected schools C and D were executed within six months of approval of their respective applications and signed by the authorizer's director of schools and board chair, neither agreement included signatures from the governing board, and no further documentation was provided as evidence that signing authority had been delegated by the governing board to another representative for the charter schools.					
ii.	Documentation did not include any evidence of ensuring mutual understanding and acceptance of the terms of the charter agreement prior to execution for either of the selected schools, such as email communication or meetings between the authorizer and the charter school to discuss the terms or evidence of governing board discussion of the proposed agreement. The authorizer noted in its narrative that charter school leaders were invited to attend and ask questions during the board meeting in which the charter agreement was up for a vote; however, this does not constitute ensuring understanding and acceptance of the terms prior to execution of the agreement, as required by this sub-standard.					

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.		1			
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.			2		
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. 			2		
v. Ensures that purchasing any fee-based services that the authorizer provides is explicitly not a condition of charter approval, continuation, or renewal.			2		
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
2.2
Evaluative Comments:

- i. Section 5.1 of the charter agreement for selected school D defines the ten-year charter term and the authorizer’s responsibility to conduct a high-stakes review in year five of the term. However, though the charter agreement for selected school C states that the term is for ten years, it also includes start and end dates that equal nine years instead, and no further documentation was provided demonstrating that this calculation error was corrected. Additionally, neither agreement states the requirement of the authorizer to produce an annual performance report for the selected schools.
- ii. Charter agreements for the selected schools include material terms throughout (i.e., enrollment, governance, discipline, employment), and the agreements incorporate by reference additional terms provided in the approved application. While having no impact on the score, the authorizer should align its references and attachments as not all attachments are included, and more than one document is named Appendix 1.
- iii. Section 7.9 of the charter agreements for the selected schools clearly allows for modification to the agreement by written amendment; however, the agreements do not include language that distinguishes any difference between changes to material and non-material terms, as required by this sub-standard.
- iv. While the charter agreements for the selected schools address some of the criteria of this sub-standard, the agreements do not state all responsibilities of the authorizer (i.e., annual evaluation), do not define the criteria and conditions for renewal, non-renewal, or intervention; do not state the pre-opening requirements; and do not state the responsibilities of the school or authorizer in the event of a closure. Additionally, the agreements include reporting requirements that impede upon charter schools autonomy, such as requiring notice to the authorizer “prior to making an expenditure of more than fifty thousand dollars” (section 3.12.3) and requiring the school to incorporate a provision into its enrollment agreement in which the parents or guardians acknowledge that “the student may not withdraw from the charter school during the year” (section 3.6.5). Furthermore, the agreement for selected school C does not state any performance standards, such as through reference to the authorizer’s performance framework. The authorizer did acknowledge that similar feedback was provided in its previous evaluation and that its charter agreements have not since been amended to address these concerns.
- v. While some sections of selected schools’ charter agreements allow the school to enter into a fee-based service agreement with the authorizer for services such as special education and food, neither agreement includes explicit language stating that fee-based service agreements with the authorizer shall not be a condition of approval, continuation, or renewal, as required by this sub-standard.
- vi. N/A – As affirmed by the authorizer, none of its charter schools currently has a fee-based service agreement 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 (optional). 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. Section 1.5 of the charter agreements for selected schools C and D generally outline performance standards and establish the performance framework as the means for evaluating school quality. The board-approved performance framework is attached as an exhibit to the charter agreement for the selected schools. The performance framework sets student achievement as the primary measure of school quality and includes academic, financial, and organizational targets as well as expectations and outcomes for students with disabilities; however, neither the performance framework nor the charter agreements clearly connect performance outcomes to the conditions for renewal.</p> <p>ii. The authorizer’s current performance framework meets most of the stated academic, financial, and organizational performance criteria for this sub-standard; however, neither the current performance framework nor any additional documentation define the sources of organizational data that forms its evidence base for evaluation. While having no impact on the score, the authorizer acknowledged the need to update its framework to include the option to incorporate mission-specific performance measures. Authorizers will be held to this evaluation expectation beginning in 2027.</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: ³ <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				

³ 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.

<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>N/A – Neither of the selected schools currently contract with an educational service provider.</p>	

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.		1			
ii.	Defines and communicates to schools the process, methods, and timing of gathering and reporting school performance and compliance data.				3	
iii.	Implements an accountability system that effectively streamlines federal, state, and local performance expectations and compliance requirements while protecting schools' legally entitled autonomy and minimizing schools' administrative and reporting burdens.				3	
iv.	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.				3	
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.				3	
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						2.71
Evaluative Comments:						

- i. While the authorizer's 2025-26 handbook outlines a performance monitoring process that includes several authorizing responsibilities, such as conducting two site visits per year, annual performance reviews, and compliance monitoring, and documentation serves as evidence of implementing these responsibilities, the authorizer has not yet defined this system as part of a board-approved policy, as required by this sub-standard. Additionally, the 2024-25 and 2025-26 charter handbooks include conflicting information about how the authorizer's performance monitoring system informs renewal, revocation, and intervention decisions. For example, the 2024-25 handbook includes a hyperlink to the authorizer's board-approved performance framework, while the 2025-26 handbook references a different framework, stating "The authorizer will make rigorous and standards-based decisions using the Tennessee State Board of Education's currently adopted performance framework".
- ii. The authorizer's charter handbook generally defines its reporting processes, and its reporting platform provides a specific list of reporting requirements as well as the methods and timing for submission; however, the reporting platform was recently purchased, and the authorizer lacked a clear reporting system for most of the evaluation review term. The authorizer described an intentional focus on building clear structures and systems during this review term, and charter school leaders agreed that the reporting platform has helped in defining and communicating a reporting process.
- iii. While the documentation includes evidence of implementing an accountability system and the authorizer's use of a reporting platform helps to streamline expectations and requirements, it is unclear why some reporting is requested (i.e., federal, state or local requirements) nor do reporting requests differentiate between authorizing or LEA responsibilities, which can create administrative and reporting burdens on its schools.
- iv. While sample surveys issued after the authorizer's 2025 summer charter training demonstrate that the authorizer seeks feedback on topics for professional development opportunities, the documentation does not include evidence of soliciting feedback at least annually during the evaluation review term. Additionally, the documentation does not demonstrate that the authorizer used the feedback it collected to inform technical guidance offerings to its charter schools. Charter school leaders offered mixed feedback on whether the authorizer solicits feedback or provides technical guidance, and the authorizer affirmed that this is an ongoing goal for its office.
- v. Site visit reports from the 2023-24 and 2024-25 school years demonstrate that the authorizer conducts at least one formal on-site review of its schools and provides schools with a report summarizing the review. However, the documentation did not include evidence of a clear connection demonstrating how data collected during a visit informs a school's annual evaluation, such as through its site visit reports, protocol, or data sources within the performance framework.
- vi. The charter handbook and site visit protocol communicate the purposes (i.e., renewal, monitoring, student support services), frequency, and methods of on-site visits, and email communication documents the authorizer providing advanced notice of a visit to its schools. However, formal site visit reports include recommendations from the authorizer that imposes on school autonomy by including specific suggestions within a school's purview, such as changes to curriculum, academic coaching cycles, and communication with stakeholders.
- vii. Annual reports and feedback documents demonstrate the authorizer evaluates its schools annually on performance and progress toward standards and targets on its performance framework. Email communication document the authorizer communicating results with school leadership and annual reports are posted on the authorizer's website; however, the documentation did not include evidence of communicating results to school governing boards beyond requesting that leaders provide their governing boards with a copy of the report.

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.			2		
ii.	Collects information from the school in a manner that minimizes administrative burdens on the school, while ensuring that performance and compliance information is collected with sufficient detail and timeliness to protect student and public interests.				3	
iii.	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						2.67
Evaluative Comments:						
i.	The authorizer respects autonomy through evidence, such as email invitations for school leaders to attend optional district-wide training and monitoring processes that are largely focused on outcomes. However, the documentation included evidence of providing feedback after conducting informal support visits that included action steps directing educational choices (i.e., reading certain articles, specific meetings they should schedule), while at other times the feedback is framed as “suggestions to consider”. Though the authorizer articulated a desire to only provide recommendations and to respect autonomy, feedback language should be updated in places to reflect this position. School leaders shared mixed responses when asked about the authorizer directing decisions.					
ii.	The authorizer recently transitioned to a reporting platform to collect information in a manner that reduces administrative burden; however, as a newer system and given the authorizer’s acknowledgement of its lack of licensure review prior to implementing the new system, protecting student and public interests was not in place for the entirety of the evaluation review period.					
iii.	Documentation included evidence of reviewing compliance requirements with legal counsel and ongoing collaboration between various departments that support charter schools within the authorizer’s district office. However, the authorizer has largely focused on establishing compliance and oversight systems and assessing where the line in autonomy lies; hence, specific examples of considering ways to increase school autonomy were not specifically provided.					

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.			2		
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.					4
iv.	Ensures that schools' student discipline policies and actions are legal, fair, and equitable and that no student is suspended, expelled, or counseled out of a school outside of that process, and that schools have a clear process for addressing parent/community grievances.		1			
Standard Rating						2.25
Evaluative Comments:						
i.	While the authorizer's documentation included evidence of an admissions audit and collecting a lottery process document for one of its charter schools, the documentation lacked evidence of ensuring that schools' admission processes are open to all, publicly verifiable, and do not establish undue barriers to application, such as reviewing applications and enrollment paperwork, collecting lottery certifications, or auditing enrollment policies. Additionally, concerns were raised in the sample lottery process document that requires families to submit documents before lottery results are announced and states enrollment preferences that do not align with requirements in state law ⁴ .					
ii.	Documentation included evidence of authorizing staff conducting desktop monitoring and follow-up with its schools regarding services for English learners and students with disabilities. The authorizer uses its site visits to conduct interviews and file audits as another opportunity to ensure access and services for these students and has related indicators on its performance framework. However, the documentation does not include evidence of ensuring equitable access and inclusive services to other populations of students named in this sub-standard, beyond students with disabilities or English learners.					
iii.	The charter handbook defines the specific roles and responsibilities of the authorizer and the charter school in serving students with disabilities. Monitoring trackers and intervention notices provide examples of aligning to these expectations.					

⁴ T.C.A. 49-13-113(d)(4)

- iv. A notice of concern documents that the authorizer monitors school reporting of discipline data in their student information systems, and the authorizer's website directs families to school procedures for addressing grievances. However, the documentation does not include evidence of the authorizer ensuring schools' discipline policies and actions are legal, fair and equitable, such as through school handbook or policy reviews, or that schools have a clear process for addressing grievances as required by this sub-standard.

Standard 4d - School Intervention		0	1	2	3	4
Sub-standards						
i.	Establishes and clearly communicates to schools at the outset an intervention and problem-solving policy that states the general conditions that may trigger intervention and the types of actions and consequences that may ensue.					4
ii.	Utilizes ongoing oversight and evaluation processes to determine when intervention in non-emergency situations is needed.			2		
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						3.2
Evaluative Comments:						
i.	Board policy 4.2122 establishes and communicates an intervention and problem-solving policy to charter schools. The policy states general conditions that may trigger intervention, such as weak performance, failure to comply with state laws or district policies, and failure to meet objectives in a performance improvement plan and includes the types of actions and consequences that may ensue, including charter review and revocation. The charter handbook includes a copy of the board’s intervention policy, which is communicated to schools.					
ii.	Annual reports, trackers, and intervention notices from the 2024-25 school year document instances in which the authorizer utilizes its evaluation processes to determine when intervention is needed. However, the documentation did not include evidence of this outside of the 2024-25 school year, and annual reports document multiple instances of sub-performance among its charter schools (i.e., multiple years of Unrestricted Days Cash falling “below standard”, 8 of 9 financial measures scored as “below standard”) with no documentation of intervention notices issued. Additionally, a notice of revocation related to unlicensed teachers in the 2024-25 school year provides further evidence that the authorizer has not fully established ongoing monitoring structures to use throughout the year that would determine when intervention is needed in non-emergency situations. The authorizer’s recent purchase of a reporting platform and ongoing efforts to streamline requirements among departments within the district should help to systematize and inform intervention decisions.					
iii.	Formal notices are evidence-based (i.e., notices in response to outcomes in the annual report) and are tied to clear contract violations or performance deficiencies aligned to its intervention policy; however, not all notices are dated to ensure timeliness and, in several notices, the authorizer requests that the school leader share the documentation with the governing board rather than the authorizer sending notices directly.					

- iv. Formal notices demonstrate that the authorizer allows schools reasonable time and opportunity for remediation in non-emergency situations.
- v. Formal notices issued during the evaluation review term demonstrate the authorizer's use of intervention strategies that preserve school autonomy, such as developing a corrective action plan; however, the notices also include recommendations from the authorizer rather than identifying what the school must remedy without prescribing solutions, and not all notices clearly state consequences for noncompliance.

Standard 4e - Public Reporting Sub-standards	0	1	2	3	4
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. 				3	
Standard Rating					3
Evaluative Comments:					
i. The authorizer’s website includes hyperlinks to its annual reports, including the two that were published within the evaluation review term, thus demonstrating that the authorizer produces and communicates its reports to the public. An email to charter school leaders demonstrates the report is shared with schools; however, there is no evidence of directly sharing with its decision-makers. Additionally, while the reports include information on the authorizer meeting its goals and school performance information is largely aligned with the standards and targets in the performance framework, the weights and points for academic performance were not applied, and comparative performance was not included as per the performance framework.					

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.				3	
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.	N/A				
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.	N/A				
iv. Does not make amendment decisions on the basis of political or community pressure.	N/A				
Standard Rating					3
Evaluative Comments:					
i. The authorizer’s charter handbook establishes and communicates its amendment process. The process defines material modifications and includes some timelines found in rule. However, this section of the handbook does not include the required fall submission dates and does not affirm that the state’s amendment petition forms will be used for the application and rubric. ii. N/A – The authorizer did not receive an amendment petition during the evaluation review term. iii. N/A – The authorizer did not receive an amendment petition during the evaluation review term. iv. N/A – The authorizer did not receive an amendment petition during the evaluation review term.					

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.		1			
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. 		1			
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.		1			
iv.	Requires any school seeking renewal to complete the state’s renewal application and follows the renewal application timeline required in state law.				3	
Standard Rating						1.5
Evaluative Comments:						
<ul style="list-style-type: none"> i. While the authorizer provided evidence of an interim review template and the handbook includes a description of the authorizer’s interim review process, the documentation does not include evidence of an interim review that was conducted for selected schools I and J during each school’s fifth year of their respective charter terms, as required in state law⁵. ii. The authorizer’s documentation for the selected schools does not include evidence of providing to each school in advance of the renewal decision a cumulative performance report that summarizes the performance record over the charter term, states summative findings, and prospects for renewal, as described in its charter handbook and required in state law. iii. Board policy 4.2121 outlines a renewal process that provides schools with the opportunity to “respond to its cumulative performance report, and to submit any corrections or clarifications for the report”; however, submitted documentation did not make evident that the authorizer implemented this process for the selected schools. iv. While renewal application materials for the selected schools demonstrate that the authorizer requires schools seeking renewal to complete the state’s application, the renewal process for selected school I was implemented a year earlier than the timeline required in state law; therefore, the school’s new charter term began when it still had a year remaining of its original charter term. Upon review of selected school I’s original charter agreement, the early renewal likely stemmed from an error in the starting year of the charter term, as similarly noted for another selected school in the evaluative comment for sub-standard 3bi. 						

⁵ T.C.A. § 49-13-121(k)

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.				3	
ii.	Defines and communicates with its schools the criteria for renewal and non-renewal decisions that are consistent with the charter agreement.			2		
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.			2		
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.		1			
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						2.5
Evaluative Comments:						
i.	Board policy 4.2121 communicates its renewal process, which requires decisions to be based on “demonstrable merit”. The policy establishes a body of evidence that includes a renewal application and evidence of meeting performance standards stated in the charter agreement and aligned to its ongoing monitoring, data collection, and reporting requirements. The renewal policy also states that information included in the renewal application “shall be evaluated using the TN Model Scoring Rubric for Charter School Renewal”. The policy does require updating, however, as some references to the TN Department of Education are out-of-date due to recent changes in state law, and the policy does not require review of the cumulative performance report as part of the body of renewal evidence, as required in state law ⁶ .					
ii.	While the handbook states, “Renewal recommendations are made based upon a body of evidence around the school’s academic and organizational performance” and includes a list of evidence collected, the documentation does not include specific criteria for renewal and non-renewal decisions. Additionally, the handbook does not align with language in the authorizer’s charter agreements which limit the body of evidence for renewal to the					

⁶ T.C.A. § 49-13-121

- renewal application only. In the absence of specific criteria, the handbook language appears to prevail and require “meeting” performance expectations as the basis for renewal though this is not clearly defined, and school leaders were unable to articulate how the authorizer makes renewal decisions.
- iii. While the authorizer renewed the selected schools, summary reports prepared for decision makers lacked comprehensive performance data, lacked any reference to outcomes on a scoring rubric (as required for use by its policy), and lacked any recommendation from authorizing staff. Additionally, information included in the summary reports did not clearly align with the authorizer’s stated renewal criteria evaluated in sub-standards 5ci and 5cii and instead included unrelated statements, such as “made improvements to the physical plant”, “emphasis is placed on iReady improvements”, and “there are numerous partnerships in the state and local community”. Furthermore, during the board meeting in which the renewals were considered, one decision-maker asked if there was any data on the schools and how the schools were performing compared to their direct-run schools, to which a district leader stated they did not have specific data but could provide an overview. Decision-makers posed questions regarding the schools to its staff, and it was revealed that one of the schools up for renewal was on the priority schools list (e.g., performing among the bottom 5% of the state); this data point was not documented in the summary report. Therefore, the documentation does not make evident that the authorizer’s decision to grant renewal of the selected schools was grounded in evidence of achieving stated targets, is organizationally and fiscally viable, and faithful to the terms of the agreement.
 - iv. While the authorizer’s narrative states that “schools are promptly informed of the renewal decision”, no documentation demonstrating the issuance of decision notices to the selected schools was provided, as required by this sub-standard.
 - v. Board meeting agendas, minutes, and meeting recordings that are publicly available on the authorizer’s website demonstrate that the authorizer promptly communicates decisions to approve renewals to the public and board meetings are livestreamed and open to the public.
 - vi. Provided documentation and board meeting recordings did not reveal evidence of making renewal decisions based solely on political or community pressure. However, the decision to renew selected school I appears to have been made based on hope for improved future performance, rather than the school’s track record of success (or lack thereof, in the case at hand). This was evidenced during the board meeting in which the school’s renewal application was discussed. Specifically, decision-makers raised concerns regarding the school’s academic performance and asked authorizing staff for details on support that the district will provide in the future and additional opportunities to take action if the school’s academic performance fails to improve.

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.		1			
ii.	Revokes a charter during the charter term only if there is clear violation in accordance with the reasons set forth in state law.	N/A				
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.	N/A				
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.	N/A				
v.	Does not make revocation decisions on the basis of political or community pressure.	N/A				
Standard Rating						1
Evaluative Comments:						
i.	While documentation included a draft version of a revocation policy that would establish criteria for revocation decisions and a process that is consistent with state law, the policy has not yet been approved by its decision makers.					
ii.	N/A – The authorizer did not implement a revocation during the evaluation review term.					
iii.	N/A – The authorizer did not implement a revocation during the evaluation review term.					
iv.	N/A – The authorizer did not implement a revocation during the evaluation review term.					
v.	N/A – The authorizer did not implement a revocation during the evaluation review term.					

Standard 5e - Closure Sub-standards	0	1	2	3	4
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.		1			
Standard Rating					1
Evaluative Comments:					
i. While the charter handbook and a closure procedures manual state that the authorizer “will work closely with the school’s governing board prior to the beginning of closure procedures to agree on which tasks are necessary” and will outline a process for closure, neither document clearly establishes a closure process that outlines the responsibilities of the charter school and authorizer, such as timely notification to parents, orderly transition of student records, and disposition of funds, to ensure alignment with this sub-standard, state guidance, and state law. The authorizer did not oversee a charter school closure during the evaluation review term.					