



Charter School Authorizer Evaluation Report
Hamilton County Schools
2021

Charter School Authorizer Evaluation 2021

Authorizer: Hamilton 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 is the fourth (4th) state in the U.S. to implement authorizer evaluations and 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 gathered feedback from operators, authorizers, and charter school stakeholders on its Quality Charter Authorizing Standards, conducted focus groups to review feedback, connected with the three (3) other states that have an established authorizer evaluation system, and established a task force that included authorizers and operators to share in the development of the evaluation process. In addition, the State Board implemented a pilot evaluation with two (2) authorizers participating voluntarily in Fall 2020. The pilot served as a valuable step to prepare the State Board and Tennessee authorizers for the official Fall 2021 high-stakes authorizer evaluations.

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, which provide further details on the evaluation process, evaluation ratings, and corresponding follow-up actions. The State Board believes that quality authorizing leads to quality charter schools and increased educational opportunities for students, which is the ultimate goal of the authorizer evaluations.

Evaluation Schedule

This report documents half of the State Board’s first high-stakes evaluation cycle with a full evaluation of three (3) authorizers. Evaluations are staggered and occur at least biennially; the two (2) year evaluation sequence repeats into the future. If an authorizer receives an Exemplary rating for two (2) consecutive evaluations, the authorizer is exempted 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 Unsatisfactory/Incomplete rating. An exemption or required additional evaluation does not change an authorizer’s assigned evaluation cohort, as shown in Table 1.

Table 1. Cohort Evaluation Schedule

| School Year | Authorizers |
|-------------|---|
| Cohort 1 | <ul style="list-style-type: none"> ○ Hamilton County Schools ○ Knox County Schools ○ Shelby County Schools |
| 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 twenty-four (24) standards within State Board [Policy 6.111 – Quality Charter Authorizing Standards](#). The standards are organized into six (6) categories: Agency Commitment and Capacity; Application Process and Decision Making; Performance Contracting; Ongoing Oversight and Evaluation;

Charter School Authorizer Evaluation 2021

Authorizer: Hamilton County Schools

Revocation and Renewal Decision Making; and Advanced Standards. The evaluation’s overall rating is based on the evaluation team’s consideration of standards, with the Advanced Standards category providing the opportunity for bonus points.

Characteristics of the Process:

- The evaluation team consisted of a Tennessee authorizer representative, a national charter school consultant, and a member of the State Board staff. A second national charter school consultant served as the quality editor, responsible for analyzing and verifying the evidence and ratings for each standard.
- The evaluation focused on a two (2) year review term from September 1, 2019 to August 31, 2021 and was limited to the review of the following: documents submitted by the authorizer, including corresponding documentation for randomly selected schools for each evaluation standard, an interview with the school leaders from the authorizer’s portfolio of schools, and a documentation debrief with the authorizer. The State Board also considered 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 evaluated the evidence by comparing it against the rubric to determine which performance level best represented the authorizer’s practice. Each sub-standard was assigned a rating of zero (0) through four (4), as represented in Table 2, and each standard received a rating representing the average of its sub-standards.
- The final product of each evaluation is this completed Authorizer 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.
- The evaluative comments provide brief statements to describe the nature of the documented evidence in relation to each sub-standard of the rubric. Comments also note cases in which the authorizer did not provide relevant documents.
- While the State Board developed the process to ensure a consistent and normed evaluation, evaluations of the twenty-four (24) rubric standards were 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 0520-14-01-.08, the final Authorizer Evaluation Report for the authorizer will be presented to the State Board for approval at the next regular or special called meeting following release of the final Authorizer 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 but Satisfies LESS THAN 50% of the Standard | Documentation Addresses <u>and</u> Satisfies MOST of the Standard | Documentation Addresses <u>and</u> Satisfies ALL 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 |

Executive Summary

| General Information | |
|--|---|
| Authorizer: | Hamilton County Schools (“HCS”) |
| About the Authorizer: | HCS is a district-level authorizer in Hamilton County. HCS’s first charter school opened in 2008 and its charter schools currently serve approximately 4% of the district’s students. |
| # Operational Schools: # Students Enrolled: | 5 schools in the 2020-21 school year 1,710 students in the 2020-21 school year |
| # Approved School(s) in Development: (name and planned opening year) | 3 schools in development <ul style="list-style-type: none"> • Montessori Elementary School of Highland Park (opened in 2021) • Chattanooga Charter School of Excellence High School (opening in 2022) • Ivy’s Skillern Elementary School (opening in 2022) |
| Closed Schools: (name and year closed) | 0 schools closed since September 1, 2019 |

| Evaluation Summary | |
|--------------------|--|
|--------------------|--|

| |
|--|
| <p>Identified Areas of Strength</p> <ul style="list-style-type: none"> • As of April 2021, the authorizer effectively utilizes a portion of its authorizer fee to fund a full-time charter school coordinator to support its growing portfolio of charter schools. • The authorizer approves applications that are comprised of a detailed plan for charter school opening, operation, and fiscal stability, with little substantive work left for later development. • The authorizer respects charter school autonomy and provides its schools with opportunities to participate in district-led professional development for teachers and leaders. <p>Identified Areas for Growth</p> <ul style="list-style-type: none"> • The authorizer lacks an established performance framework that is outlined as either an item within or as an exhibit of the charter agreement as required by state law and has not conducted annual performance evaluations of its charter schools. • The authorizer has not established criteria for renewal and has not consistently held five (5) year interim reviews for its schools as required by state law. • The authorizer has not implemented a comprehensive performance accountability and compliance monitoring system that is aligned to its charter agreement and provides key outcomes to inform renewal, revocation, and intervention decisions. <p>Required Follow-Up Actions</p> <ul style="list-style-type: none"> • Submission of a corrective action plan approved by the State Board’s executive director or designee prior to implementation including the required follow-up actions stated in the attached letter. • Submission of a self-assessment in the 2022-23 school year with documentation demonstrating completion of the required follow-up actions outlined in the approved corrective action plan. |
|--|

Charter School Authorizer Evaluation 2021

Authorizer: Hamilton County Schools

Overall Ratings Summary

| Standard | | Rating (0-4) | Average |
|-----------------------|--|--|---------|
| 1a | Planning and Commitment to Excellence | 2 | 1.72 |
| 1b | Human Resources | 0.67 | |
| 1c | Financial Resources | 2.5 | |
| 2a | Application Proposal Information, Questions, and Guidance | 2.16 | 2.21 |
| 2b | Fair, Transparent, Quality-Focused Procedures | 1.6 | |
| 2c | Rigorous Approval Criteria | 3 | |
| 2d | Rigorous Decision Making | 2.33 | |
| 2e | Elements for Existing School Operators or Replicators (if applicable) | 2 | |
| 2f | Elements for Applicants Proposing to Contract with Educational Service Providers, including Charter Management Organizations (if applicable) | N/A | |
| 3a | Charter Agreement Term, Negotiation, and Execution | 1 | 1 |
| 3b | Rights and Responsibilities | 1 | |
| 3c | Performance Standards | 1 | |
| 3d | Provisions for Educational Service Provider (ESP) Contracts (if applicable) | N/A | |
| 3e | ESP Contracts Additional Provisions. | N/A | |
| 4a | Performance Evaluation and Compliance Monitoring | 1.2 | 1.74 |
| 4b | Respecting School Autonomy | 2.25 | |
| 4c | Protecting Student Rights | 1.25 | |
| 4d | School Intervention | 3 | |
| 4e | Public Reporting | 1 | |
| 5a | Revocation | 3 | 1.94 |
| 5b | Renewal Decisions Based on Merit and Inclusive Evidence | 1.33 | |
| 5c | Cumulative Report and Renewal Application | 2 | |
| 5d | Fair, Transparent Process | 1.4 | |
| 5e | Closure | 2 | |
| 6a | Advanced Standard (Bonus) | 0.8 | 0.8 |
| Overall Rating | | 1.83 Approaching Satisfactory | |

Charter School Authorizer Evaluation 2021
Authorizer: Hamilton County Schools

| Standard 1a - Planning and Commitment to Excellence | 0 | 1 | 2 | 3 | 4 |
|--|----------|----------|----------|----------|----------|
| Sub-standards | | | | | |
| i. Supports and advances the purposes of charter school law. | | | 2 | | |
| ii. Ensures that the authorizer’s local board of education or authorizing board, leadership, and staff understand and are committed to the quality charter authorizing principles and standards and developing as authorizing professionals. | 0 | | | | |
| iii. Defines external relationships and lines of authority to protect its authorizing functions from conflicts of interest and political influence. | | 1 | | | |
| iv. Implements policies, processes, and practices that streamline and systematize its work toward stated goals and executes its duties efficiently while minimizing administrative burdens on schools. | | 1 | | | |
| v. Evaluates its work regularly against national and state standards for quality authorizing and recognized effective practices and develops and implements timely plans for improvement when necessary. | | | 2 | | |
| vi. States a clear mission for quality authorizing. | | | | | 4 |
| vii. Makes authorizing decisions that will result in positive student outcomes, in accordance with state law. | | | | | 4 |
| Standard Rating | | | | | 2 |

| Evaluative Comments: | |
|-----------------------------|--|
| i. | While applications related to the approval of two (2) new charter schools and the authorizer’s board minutes, annual reports, and copies of email invitations to charter school content leads to attend professional development opportunities address purposes one (1) through five (5) of the charter law, the documentation does not include evidence of affording parents meaningful opportunities to participate in the education of their children. Additionally, the documentation does not demonstrate advancing any of the purposes. ¹ |
| ii. | While the authorizer created a full-time charter school staff position in 2021 and the staff member has participated in an authorizing bootcamp training and national conference for authorizers, all of the development opportunities occurred outside of the review term. Additionally, the documentation does not demonstrate how any other authorizing staff or members of the local board of education are developing as authorizing professionals. |

¹ Tennessee Code Annotated (T.C.A). § 49-13-102 states the six (6) purposes of a charter school: improve learning for all students and close the achievement gap between high and low students; provide options for parents to meet educational needs of students; encourage the use of different and innovative teaching methods, and provide greater decision making authority to schools and teachers in exchange for greater responsibility for student performance; measure performance of pupils and faculty, and ensure that children have the opportunity to reach proficiency on state academic assessments; create new professional opportunities for teachers; and afford parents substantial meaningful opportunities to participate in the education of their children.

- iii. While the authorizer’s documentation included a conflict-of-interest form that is specific to authorizing, the document is in draft form and has not yet been implemented. Additionally, the documentation does not include an organizational chart or other documentation outlining the authorizing roles and responsibilities within the organization.
- iv. While the authorizer’s policy and procedures manual includes closure procedures, the closure protocol (indicated as Appendix B) was not attached and no other finalized policies or procedures were included within the manual. Additionally, the authorizer submitted a performance framework, application guidance, and five (5) year review guidelines; however, these documents are in draft form and have not yet been implemented. Furthermore, the documentation does not include evidence of creating authorizing goals to streamline its work or evidence of systems to minimize administrative burden on its schools.
- v. While the authorizer completed a self-assessment as part of its evaluation, evidence of an improvement plan created as a result of its evaluation was not provided nor was evidence related to evaluating its work outside of an evaluation year.
- vi. The mission of the authorizer’s charter schools office 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.”
- vii. As documented in the authorizer’s narrative and the board minutes for charter school application reviews, the authorizer approved two (2) schools with a track record of positive student outcomes.

| Standard 1b - Human Resources | | 0 | 1 | 2 | 3 | 4 |
|--------------------------------------|---|----------|----------|----------|----------|-------------|
| Sub-standards | | | | | | |
| i. | Through intra- or inter-agency collaborations, contractual relationships and/or staff, enlists expertise and competent leadership for all areas essential to charter school oversight—including, but not limited to, education leadership; instruction; 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. | | 1 | | | |
| ii. | Employs competent personnel at a staffing level appropriate and sufficient to carry out all authorizing responsibilities in accordance with national and state standards, and commensurate with the scale of the charter school portfolio. | | 1 | | | |
| iii. | Demonstrates an on-going commitment to developing and retaining authorizing staff members and provides regular professional development for the agency’s leadership and local board of education or authorizing board to achieve and maintain high standards of professional authorizing practice and to enable continual agency improvement. | 0 | | | | |
| Standard Rating | | | | | | 0.67 |
| Evaluative Comments: | | | | | | |
| i. | The authorizer’s documentation does not include an organizational chart or authorizer fee report designating additional staff, beyond the full-time coordinator, funded by the authorizer fee. Additionally, while the authorizer’s documentation includes the resume for the full-time charter school coordinator with expertise in some areas of charter school oversight, no other resumes were submitted. | | | | | |
| ii. | While the documentation included an authorizing budget, job descriptions for exceptional education and English learner support members, and evidence of one (1) full time position that was established in April 2021, without additional evidence (e.g., authorizer fee report, staff resumes, organizational chart), there is insufficient documentation to affirm appropriate and sufficient staffing to carry out all authorizing responsibilities. | | | | | |
| iii. | The documentation included evidence of one (1) staff member participating in on-going professional development; however, these development opportunities occurred outside of the review term, and no further documentation was provided. Additionally, the authorizer’s narrative affirmed that “there is not ongoing school board education but that is an area to be addressed by the new coordinator.” | | | | | |

| 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 statute, including all relevant requirements for use of the authorizer fee. | | | 2 | | |
| ii. | Structures its funding in a manner that avoids conflicts of interest, inducements, incentives, or disincentives that might compromise its judgment in charter approval and accountability decision making. | | | | | 4 |
| iii. | Deploys funds effectively, transparently, and efficiently with the public and student interests in mind. | | | 2 | | |
| iv. | Annually reports the authorizing obligations fulfilled using the authorizer fee in accordance with state law. | | | 2 | | |
| Standard Rating | | | | | | 2.5 |
| Evaluative Comments: | | | | | | |
| i. | While the FY20 and FY21 authorizing budgets demonstrate the authorizer’s use of the collected fee to fund staff, contracted services, and membership with a national authorizing association, the documentation does not include any authorizer fee reports or evidence of devoting financial resources to fulfill all authorizing responsibilities, such as special education and English learner services. | | | | | |
| ii. | There is no evidence of an unaddressed conflict of interest. | | | | | |
| iii. | While the authorizing budgets document the authorizer’s use of collected fees to cover authorizing costs and a screenshot demonstrates that the authorizing budget is publicly shared on the Tennessee Department of Education’s (“TDOE”) website, a process for determining spending was not provided in the documentation. Additionally, the documentation does not include the authorizer’s annual fee reports. | | | | | |
| iv. | While the annual authorizing budgets were provided and include evidence of fulfilling some authorizing obligations using the authorizer fee, no annual authorizer fee reports, as required by state law, were submitted. | | | | | |

Charter School Authorizer Evaluation 2021
Authorizer: Hamilton County Schools

| Standard 2a - Proposal Information, Questions, and Guidance | | 0 | 1 | 2 | 3 | 4 |
|--|---|----------|----------|----------|----------|-------------|
| Sub-standards | | | | | | |
| i. | Issues a charter application information packet or request for proposals (RFP) that: a) States any chartering priorities the authorizer may have established; b) Articulates comprehensive application questions to elicit the information needed for rigorous evaluation of applicants' plans and capacities; and c) Provides clear guidance and requirements regarding application content and format, while explaining evaluation criteria. | | 1 | | | |
| ii. | Welcomes proposals from first-time charter applicants as well as existing school operators/replicators, while appropriately distinguishing between the two (2) kinds of applicants in proposal requirements and evaluation criteria. | | | 2 | | |
| iii. | Encourages expansion of charter schools that demonstrate academic success, financial viability, organizational health, and capacity for growth. | | | 2 | | |
| iv. | Encourages replication of charter schools that demonstrate academic success, financial viability, organizational health, and capacity for growth. | | | 2 | | |
| v. | Considers diverse educational philosophies and approaches. | | | | 3 | |
| vi. | Requires applicants to demonstrate capacity to serve students with diverse needs, such as students with disabilities or learning exceptionalities and English learners. | | | | 3 | |
| Standard Rating | | | | | | 2.16 |

| Evaluative Comments: | |
|-----------------------------|--|
| i. | The authorizer utilizes the state's charter school application, as required, which articulates the application questions. However, while the authorizer affirmed use of the state's scoring rubric during the document debrief, no documented evidence of its use, either as part of the application materials, stated within an application process/policy, or a consensus rubric, was submitted. Additionally, while an application guidance document with chartering priorities was submitted, the document is in draft form and no further evidence of issuing an application packet was provided. |
| ii. | While the state's charter school application sets the requirements for first-time and existing operator applicants, there is no evidence of the authorizer welcoming proposals, such as by sharing the application or a guidance document via its website. Additionally, the documentation does not make evident the authorizer's use of the state's scoring rubric to affirm evaluation criteria. |
| iii. | While the state's charter school application includes questions specific to operators applying to expand, the authorizer's documentation does not include evidence of the authorizer's use of the state's scoring rubric. Additionally, the documentation does not include evidence of encouraging |

- expansion, such as direct communication with its schools regarding the process, beyond the approval of an expansion application in the 2021 application cycle.
- iv. While the state's charter school application includes questions and evaluation criteria specific to operators applying to replicate an existing school, the authorizer's documentation did not include evidence of the authorizer's use of the state's scoring rubric. Additionally, the documentation does not include evidence of encouraging replication, such as direct communication with high-performing charter schools in or outside of the district.
 - v. The state's charter school application contains questions related to characteristics of the academic program and educational philosophy without prescribing a particular approach. However, the documentation does not include evidence of the authorizer's use of the state's scoring rubric, which outlines the evaluation criteria related to a research-based academic plan that aligns to the target population and mission.
 - vi. The state's charter school application contains questions related to serving students with diverse needs. However, the documentation does not make evident that the authorizer utilizes the state's scoring rubric, which contains evaluation criteria related to preparedness and capacity for serving special populations.

Charter School Authorizer Evaluation 2021
Authorizer: Hamilton County Schools

| Standard 2b - Fair, Transparent, Quality-focused Procedures | | 0 | 1 | 2 | 3 | 4 |
|--|--|----------|----------|----------|----------|------------|
| Sub-standards | | | | | | |
| i. | Implements a charter application process that is open, well-publicized, and transparent, and is organized around clear, realistic timelines. | | | 2 | | |
| ii. | Allows sufficient time for each stage of the application and school pre-opening process to be carried out with quality and integrity. | | | | 3 | |
| iii. | Explains how each stage of the application process is conducted and evaluated. | | 1 | | | |
| iv. | Communicates the education needs of the district, the charter authorizing processes, approval criteria, and decisions clearly to the public. | | 1 | | | |
| v. | Informs applicants of their rights and responsibilities and promptly notifies applicants of approval or denial, while explaining the 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. | | 1 | | | |
| Standard Rating | | | | | | 1.6 |

Evaluative Comments:

| | |
|------|---|
| i. | While the narrative states that the authorizer will add a district-specific application section to its website, the documentation does not include evidence of an open, well-publicized, and transparent process beyond the authorizer's use of the state's charter school application, as required. |
| ii. | While a screenshot of the state's timeline for 2019 was provided, the documentation does not include evidence of a timeline for the 2020 application process either through submission of the state's timeline or in an authorizer-created document outlining each stage of the process. |
| iii. | A draft of the authorizer's charter school application guidance includes explanations for each stage of the application process. However, this document is in draft form and has not yet been implemented. |
| iv. | The board minutes for the authorizer's votes regarding the two (2) randomly selected schools for this standard demonstrate communication of its decisions with the public. A draft of the authorizer's charter school application guidance includes the needs of the district, information about the authorizing process, and the approval criteria; however, this document has not yet been finalized. |
| v. | While the authorizer's narrative states "the district charter office plans to be responsive to applicants and communicate with them about approval well within acceptable timelines", communication with the two (2) randomly selected schools for this standard, such as through a decision letter, was not submitted. Furthermore, though the recommendation reports for the randomly selected schools state the factors that determined the recommendation, there was no evidence that this document was shared with applicants. |

| Standard 2c - Rigorous Approval Criteria | | 0 | 1 | 2 | 3 | 4 |
|---|---|----------|----------|----------|----------|----------|
| Sub-standards | | | | | | |
| i. | 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, effective governance and management structures and systems, founding team members demonstrating diverse and necessary capabilities in all phases of the school's development, and clear evidence of the applicant's capacity to execute its plan successfully. | | | | 3 | |
| ii. | Establishes distinct requirements and criteria for applicants who are existing school operators or replicators. | | | | 3 | |
| iii. | Establishes distinct requirements and criteria for applicants proposing to contract with educational service providers (ESPs), including charter management organizations. | | | | 3 | |
| Standard Rating | | | | | | 3 |
| Evaluative Comments: | | | | | | |
| i. | The state's charter school application includes prompts aligned to the requirements cited in this sub-standard, and the authorizer's formal interview questions for the two (2) randomly selected schools for this standard demonstrate that the review team had an opportunity to ensure that applicants have the capacity to execute their plans successfully. However, while the recommendation report discusses evaluation criteria, without documented use of the state's scoring rubric, it cannot be ascertained if the criteria are aligned. | | | | | |
| ii. | The state's charter school application includes required questions for existing school operators or replicators. However, while the recommendation report discusses evaluation criteria, without documented use of the state's scoring rubric, it cannot be ascertained if the criteria are aligned. | | | | | |
| iii. | The state's charter school application contains required questions for applicants proposing to contract with educational service providers. However, while the recommendation report discusses evaluation criteria, without documented use of the state's scoring rubric, it cannot be ascertained if the criteria are aligned. | | | | | |

| 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, conducted by knowledgeable and competent evaluators. | | | | 3 | |
| iii. Engages, for both written application reviews and applicant interviews, highly competent teams of internal and external evaluators with relevant educational, organizational (governance and management), financial, and legal expertise, as well as thorough understanding of the essential principles of charter school autonomy and accountability. | | 1 | | | |
| iv. Provides orientation or training to application evaluators (including interviewers) to ensure consistent evaluation standards and practices, the elimination of real or perceived conflicts of interest, the observance of essential protocols, and the fair, unbiased treatment of all applicants. | | | | 3 | |
| v. 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 reviewers or decision makers and applicants. | | 1 | | | |
| vi. Approves applications that are comprised of a detailed plan for charter school opening, operation, and fiscal stability, with little substantive work left for later development. | | | | | 4 |
| Standard Rating | | | | | 2.33 |

Evaluative Comments:

- i. While the authorizer's recommendation reports and the board meeting minutes for the two (2) randomly selected schools for this standard demonstrate that the authorizer grants charters to applicants who meet the standard, without the submission of the state's scoring rubric or a policy/process document stating the approval criteria, it cannot be determined if the recommendations align with the approval criteria.
- ii. The recommendation reports for the two (2) randomly selected schools for this standard demonstrate that the authorizer evaluates the applicant's submission of the state's charter school application and conducts an in-person interview with an evaluation team. However, while a site visit of the applicant's existing schools could be considered due diligence, there is no documentation that states the authorizer conducts a site visit for all existing applicants or any other due diligence, either through a policy or process document, as part of its application process.

- iii. While the authorizer's charter school review team document includes several district staff members, the list does not include external evaluators, and the authorizer's narrative form noted that this is a goal of the charter school office. Additionally, the documentation does not include resumes or qualifications of the review team to determine relevant expertise or an understanding of the essential principles of charter school autonomy and accountability.
- iv. The authorizer's review team training presentation demonstrates that the authorizer provides application training to its evaluators, which addresses evaluation standards, essential protocols, and unbiased treatment of applicants. However, the documentation does not include evidence that reviewers are trained on the elimination of conflicts.
- v. While a draft conflict-of-interest policy was submitted, the document has not been finalized. Additionally, the documentation does not include signed conflict of interest forms from any reviewers who evaluated the applications of the two (2) randomly selected schools for this standard.
- vi. The applications for the two (2) randomly selected schools for this standard were reviewed and recommended by the review team and approved by the local board of education, thus demonstrating that the authorizer approves applicants that it determines have a detailed plan presented in their application.

| Standard 2e - Elements for Existing School Operators or Applications (if applicable) | | 0 | 1 | 2 | 3 | 4 |
|---|--|----------|----------|----------|----------|----------|
| Sub-standards | | | | | | |
| i. | Provide clear evidence of their capacity to operate new schools successfully while maintaining quality in existing schools; | | | 2 | | |
| ii. | Document their educational, organizational, and financial performance records based on all existing schools; | | | 2 | | |
| iii. | Explain any never opened, terminated, or non-renewed schools (including terminated or non-renewed third-party contracts to operate schools); | | | 2 | | |
| iv. | Present their growth plan, business plan, and most recent financial audits; | | | 2 | | |
| v. | Meet high standards of academic, organizational, and financial success to earn approval for replication; and | N/A | | | | |
| vi. | Document any current or past litigation and the resolution of such litigation. | | | 2 | | |
| Standard Rating | | | | | | 2 |

| Evaluative Comments: | |
|-----------------------------|---|
| i. | The two (2) randomly selected applications for this standard are from existing operators and therefore required to complete sections 2.12 through 2.15 related to expanding capacity while maintaining quality. However, one (1) of the two (2) applicants did not complete these sections, and no documentation was provided acknowledging or requiring the school to revise its application. |
| ii. | The two (2) randomly selected applications for this standard are from existing operators and therefore required to complete section 4.1 related to the performance records of their existing schools. However, one of the two (2) applicants did not complete this section, and no documentation was provided acknowledging or requiring the school to revise its application. |
| iii. | The two (2) randomly selected applications for this standard are from existing operators and therefore required to complete sections 2.12 and 4.1 related to any never opened, terminated or non-renewed schools. However, one (1) of the applicants did not complete these sections, and no documentation was provided acknowledging or requiring the school to revise its application. |
| iv. | The two (2) randomly selected applications for this standard are from existing operators and therefore required to complete sections 2.12, 3.3, and 4.1 related to their growth plan, business plan, and financial audits. However, one (1) of the applicants did not complete these sections, and no documentation was provided acknowledging or requiring the school to revise its application. |
| v. | N/A – The two (2) randomly selected applications were not for the replication of an existing school. |
| vi. | The two (2) randomly selected applications for this standard are from existing operators and therefore required to complete section 4.1 related to current or past litigation. However, one (1) of the applicants did not complete this section, and no documentation was provided acknowledging or requiring the school to revise its application. |

| Standard 2f - Elements for Applicants Proposing to Contract with Educational Service Providers, including Charter Management Organizations (if applicable) | | 0 | 1 | 2 | 3 | 4 |
|---|--|----------|----------|----------|----------|------------|
| Sub-standards | | | | | | |
| i. | Evidence of the service provider’s educational and management success; | | | | | |
| ii. | A description of the process for selecting the ESP; | | | | | |
| iii. | 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 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 | | | | | |
| iv. | 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. | | | | | |
| Standard Rating | | | | | | N/A |
| Evaluative Comments: | | | | | | |
| This standard is N/A. The randomly selected schools for this standard did not propose to contract with an educational service provider. | | | | | | |

Charter School Authorizer Evaluation 2021
Authorizer: Hamilton County Schools

| Standard 3a - Charter Agreement Term, Negotiation, and Execution | | 0 | 1 | 2 | 3 | 4 |
|---|--|----------|----------|----------|----------|----------|
| Sub-standards | | | | | | |
| i. | Executes a charter agreement with a legally incorporated governing board independent of the authorizer. | | 1 | | | |
| ii. | Grants charter agreements for an initial term of ten operating years with a high stake review every five years, in addition to annual performance reports. | | 1 | | | |
| iii. | Defines material and non-material terms of the charter agreement. | | 1 | | | |
| iv. | Ensures mutual understanding and acceptance of the terms of the charter agreement by the school's governing board. | | 1 | | | |
| v. | Allows—and requires charter agreement amendments for—occasional material changes to a school's plans but does not require amending the charter agreement for non-material modifications. | | 1 | | | |
| Standard Rating | | | | | | 1 |

Evaluative Comments:

| | |
|------|--|
| i. | While the authorizer submitted two (2) charter agreements for review and described a general process for developing and executing an agreement in the narrative, the agreements for the two (2) randomly selected schools, as required for this standard, were not submitted. Therefore, alignment to this sub-standard could not be determined. The State Board did review the two (2) submitted charter agreements for the purposes of continuous improvement only; this feedback did not have an impact on the score. The submitted charter agreements name the independent governing body and authorizer in the first paragraph of the document. |
| ii. | While the authorizer submitted two (2) charter agreements for review and described a general process for developing and executing an agreement in the narrative, the agreements for the two (2) randomly selected schools, as required for this standard, were not submitted. Therefore, alignment to this sub-standard could not be determined. The State Board did review the two (2) submitted charter agreements for the purposes of continuous improvement only; this feedback did not have an impact on the score. The submitted charter agreements state the initial term of ten operating years and the requirement of an interim review during the fifth academic year in section 5.1. However, the agreements do not include an expectation for the authorizer to produce annual performance reports for the school, as required by state law. |
| iii. | While the authorizer submitted two (2) charter agreements for review and described a general process for developing and executing an agreement in the narrative, the agreements for the two (2) randomly selected schools, as required for this standard, were not submitted. Therefore, alignment to this sub-standard could not be determined. The State Board did review the two (2) submitted charter agreements for the purposes of continuous improvement only; this feedback did not have an impact on the score. The submitted charter agreements do not clearly define the material and non-material terms within the amendment section or elsewhere in the agreement. |
| iv. | While the authorizer submitted two (2) charter agreements for review and described a general process for developing and executing an agreement in the narrative, the agreements for the two (2) randomly selected schools, as required for this standard, were not submitted. Therefore, alignment to this sub-standard could not be determined. The State Board did review the two (2) submitted charter agreements for the |

purposes of continuous improvement only; this feedback did not have an impact on the score. The submitted charter agreements were not fully executed with signatures from the authorizer and governing body.

- v. While the authorizer submitted two (2) charter agreements for review and described a general process for developing and executing an agreement in the narrative, the agreements for the two (2) randomly selected schools, as required for this standard, were not submitted. Therefore, alignment to this sub-standard could not be determined. The State Board did review the two (2) submitted charter agreements for the purposes of continuous improvement only; this feedback did not have an impact on the score. The submitted charter agreements included section 7.9 which states, “This agreement may be modified only by written amendment executed by all parties and their signatories hereto” and is insufficient to meet the criteria of this sub-standard. This section of the agreement should include expectations regarding material or non-material modifications that clearly define when amendments are needed.

| Standard 3b - Rights and Responsibilities | | 0 | 1 | 2 | 3 | 4 |
|--|---|----------|----------|----------|----------|----------|
| Sub-standards | | | | | | |
| i. | 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 approved by the authorizer; and g. State the responsibilities of the school and the authorizer in the event of school closures. | | 1 | | | |
| ii. | Ensures that any fee-based services that the authorizer provides are set forth in a services agreement that respects charter school autonomy and treats the charter school equitably compared to district schools, if applicable; and ensures that purchasing such services is explicitly not a condition of charter approval, continuation, or renewal. | | 1 | | | |
| Standard Rating | | | | | | 1 |
| Evaluative Comments: | | | | | | |

- i. While the authorizer submitted two (2) charter agreements for review and the narrative included an overview of the rights and responsibilities within an agreement, the agreements for the two (2) randomly selected schools, as required for this standard, were not submitted. Therefore, alignment to this sub-standard could not be determined. The State Board did review the two (2) submitted charter agreements for the purposes of continuous improvement only; this feedback did not have an impact on the score. The submitted charter agreements addressed four (4) of the seven (7) criteria of this sub-standard. However, the submitted agreements do not define the criteria and conditions for renewal, non-renewal, and intervention; the pre-opening requirements; or the responsibilities of the school and authorizer in the event of a closure.
- ii. While the authorizer submitted two (2) charter agreements for review and the narrative included an overview of the rights and responsibilities within an agreement, the agreements for the two (2) randomly selected schools, as required for this standard, were not submitted. Therefore, alignment to this sub-standard could not be determined. The State Board did review the two (2) submitted charter agreements for the purposes of continuous improvement only; this feedback did not have an impact on the score. While the submitted charter agreements included a section regarding fee-based food services, the agreement did not clearly state that the service is not a condition of approval or renewal and the fee-based service agreement was not submitted to affirm that the service agreement respects charter school autonomy and treats the school equitably compared to district schools.

| Standard 3c - Performance Standards Sub-standards | 0 | 1 | 2 | 3 | 4 |
|--|---|---|---|---|---|
| i. Executes charter agreements that plainly: <ul style="list-style-type: none"> a. Establish the performance standards under which schools will be evaluated, using objective and verifiable measures of student achievement as the primary measure of school quality, in accordance with state law; b. Define 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. Include expectations for appropriate access, education, support services, and outcomes for students with disabilities; d. Define the sources of academic data that will form the evidence base for ongoing and renewal evaluation, including state-mandated and other standardized assessments, student academic growth measures, internal assessments, qualitative reviews, and performance comparisons with other public schools in the district and state; e. Define the sources of financial data that will form the evidence base for ongoing and renewal evaluation, grounded in professional standards for sound financial operations and sustainability; f. Define the sources of organizational data that will form the evidence base for ongoing and renewal evaluation, focusing on fulfillment of legal obligations, fiduciary duties, and sound public stewardship; and g. Include clear, measurable performance standards to judge the effectiveness of alternative model schools, as defined by state law—requiring and appropriately weighting rigorous mission-specific performance measures and metrics that credibly demonstrate each school’s success in fulfilling its mission and serving its special population. | | 1 | | | |
| ii. Sets detailed performance standards. Performance standards enable schools and authorizers to know the outcomes for which authorizers will hold schools accountable. They are the basis for school evaluation and should be incorporated in the charter agreement, commonly as an attachment. Academic, financial, and organizational performance standards should include 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. Set expectations for student academic achievement status or proficiency, including comparative proficiency; | | 1 | | | |

Charter School Authorizer Evaluation 2021
Authorizer: Hamilton County Schools

| | | | | | |
|--|--|--|--|--|----------|
| <ul style="list-style-type: none"> 2. Set expectations for student academic growth, including adequacy of growth toward state standards; 3. Incorporate state and federal accountability systems, including state grading and/or rating systems; 4. Set expectations for postsecondary readiness, including graduation rates (for high schools); and 5. 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. <p>b) Financial Performance</p> <ul style="list-style-type: none"> 1. Enable the authorizer to monitor and evaluate the school’s financial stability and viability based on short-term performance; and 2. Enable the authorizer to monitor and evaluate the school’s long-term financial sustainability. <p>c) Organizational Performance</p> <ul style="list-style-type: none"> 1. Define the essential elements of the educational program for which the authorizer will hold the school accountable; 2. Define financial management and oversight standards based on generally accepted accounting principles; 3. Hold school governing boards accountable for meeting statutory and board-established operating and reporting requirements; 4. Ensure school compliance with student and employee rights and obligations; and 5. Establish expectations related to the school environment, including health and safety, transportation, facilities, and appropriate handling of records. | | | | | |
| Standard Rating | | | | | 1 |
| Evaluative Comments: | | | | | |

- i. While the authorizer submitted two (2) charter agreements for review and the narrative included an overview of the rights and responsibilities within an agreement, the agreements for the two (2) randomly selected schools, as required for this standard, were not submitted. Therefore, alignment to this sub-standard could not be determined. The State Board did review the two (2) submitted charter agreements for the purposes of continuous improvement only; this feedback did not have an impact on the score. The submitted charter agreements state that the authorizer “will establish a performance framework to evaluate the academic and operational performance of the charter school”; however, no performance framework was included. Additionally, the submitted agreements do not define the performance standards, targets, or sources for the academic, financial, and organizational data that will inform ongoing and renewal evaluations. The authorizer acknowledged in the narrative that the charter school coordinator is working with the district’s legal department to ensure all rights and responsibilities are clearly defined in the charter agreement.
- ii. The authorizer’s documentation included a draft performance framework and the narrative explained that the authorizer’s goal is to have a performance framework fully adopted and utilized by January 2022. Therefore, while the draft performance framework contains most indicators required by this sub-standard except a postsecondary readiness indicator and an option to incorporate mission-specific goals, the authorizer has not established its own performance framework or adopted the TDOE’s model performance framework, as required in state law.

| Standard 3d - Provisions for Educational Service Provider (ESP) Within Charter Agreement (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, contractual provisions 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 | | | | |
| Standard Rating | | | | | N/A |
| Evaluative Comments | | | | | |
| This standard is N/A. The randomly selected schools for this standard did not propose to contract with an educational service provider. | | | | | |

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.

Charter School Authorizer Evaluation 2021
Authorizer: Hamilton County Schools

| Standard 3e - Provisions for ESP Contract Sub-standards | 0 | 1 | 2 | 3 | 4 |
|---|------------|---|---|---|---|
| i. The roles and responsibilities of the school governing board and the ESP, including all services to be provided under the contract; | N/A | | | | |
| ii. The performance measures, consequences, and mechanisms by which the school governing board will hold the ESP accountable for performance, aligned with the performance measures in the charter agreement; | | | | | |
| iii. All compensation to be paid to the ESP including all fees, bonuses, and what such compensation includes or requires; | | | | | |
| iv. Terms of any facility agreement that may be part of the relationship; | | | | | |
| v. Financial reporting requirements and provisions for the school governing board's financial oversight; | | | | | |
| vi. 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; | | | | | |
| vii. 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; | | | | | |
| viii. Provisions for contract termination; and | | | | | |
| ix. 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: | | | | | |
| This standard is N/A. The randomly selected schools for this standard did not propose to contract with an educational service provider. | | | | | |

Charter School Authorizer Evaluation 2021
Authorizer: Hamilton County Schools

| 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 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. | | 1 | | | |
| 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. | | 1 | | | |
| iv. Provides clear technical guidance to schools as needed to ensure timely compliance with applicable rules and regulations. | | 1 | | | |
| v. Visits each school as appropriate and necessary 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. | | 1 | | | |
| vi. 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. | | 1 | | | |
| vii. Requires and reviews annual financial audits of schools, conducted by a qualified independent auditor. | | | 2 | | |
| viii. Communicates regularly with schools as needed, including both the school leaders and governing boards, and provides timely notice of contract violations or performance deficiencies. | | | 2 | | |
| ix. Provides an annual written report to each school, summarizing its performance and compliance to date and identifying areas of strength and areas needing improvement. | | 1 | | | |
| x. Articulates and enforces stated consequences for failing to meet performance expectations or compliance requirements. | | 1 | | | |
| Standard Rating | | | | | 1.2 |

Evaluative Comments:

- i. While the draft performance framework contains academic, financial, and organizational indicators and will require implementation of an accountability and monitoring system to evaluate schools, the framework has not been finalized and no further documentation was provided demonstrating implementation of an accountability system. Additionally, the documentation does not include the charter agreements for the two (2) randomly selected schools for this standard, which should state how the authorizer will make renewal, revocation, or intervention decisions. School leaders also affirmed that they do not know how these high-stakes decisions are made. Furthermore, documentation of an interim review, as required in the charter agreement and in state law, was not provided for the randomly selected school for this standard, and school leaders affirmed that interim reviews have not occurred.
- ii. While a weekly charter email with upcoming state reporting deadlines (e.g., annual report, Inform TN) and the financial audits for the two (2) randomly selected schools for this standard document some communication regarding required reports, the weekly charter email was sent on a date outside of the review term and no further evidence was submitted to demonstrate how the authorizer defines and communicates its process, methods, and timing of gathering data or evidence of any other compliance data being collected.
- iii. While the draft performance framework contains academic, financial, and organizational performance expectations, the framework has not been finalized and no further documentation was provided demonstrating the implementation of an accountability system.
- iv. While school leaders provided an example of receiving sufficient support with regard to ESSER funding, the weekly charter email evidence with upcoming state reporting deadlines (e.g., annual report, Inform TN) was sent on a date outside of the review term and no further documentation was submitted demonstrating how the authorizer provides technical guidance to schools to ensure timely compliance with rules and regulations.
- v. While the documentation included an email from the authorizer to one (1) of the randomly selected schools for this standard thanking the school for allowing the authorizer to visit, no further documentation, such as a site visit protocol, site visit report, or further information regarding the purpose, frequency, or method for the visit was provided. Additionally, the documentation does not include evidence of at least one (1) site visit occurring for each of the randomly selected schools during the review term.
- vi. While the documentation included the authorizer's 2019 and 2020 annual reports, the reports' evaluation results did not include each schools' progress toward standards and targets (e.g., special education and English learner services) beyond reporting the academic outcomes from that year's state assessments. Additionally, the charter agreements for the two (2) randomly selected schools for this standard were not submitted to review for alignment. Furthermore, the documentation does not include evidence of communication with the schools' governing board or leadership regarding each schools' annual performance.
- vii. The audits for the two (2) randomly selected schools for this standard demonstrate that the authorizer collects fiscal audits from its charter schools; however, no further documentation was provided to demonstrate communication regarding this annual requirement or how the authorizer reviews the submitted fiscal audits, such as through an executed performance framework or financial performance outcomes on an annual report.
- viii. The authorizer's documentation included evidence of communication with schools regarding special education compliance feedback. However, while an intervention protocol is included in the authorizer's policy and procedures manual, the authorizer explained that the protocol has not been used and there was no evidence of communication with schools regarding expectations for contract violations or performance deficiencies.
- ix. While the documentation included the authorizer's 2019 and 2020 annual reports, the reports do not include reporting on the schools' organizational or financial performance, a summary of compliance to date, or any identification of strengths or weaknesses. Furthermore, the documentation does not include evidence of active communication with its schools regarding the publication of the annual report.

- x. While the authorizer's documentation included evidence of communication with schools regarding special education compliance feedback, the communication does not state consequences for failing to meet compliance requirements or include any additional documentation that articulates consequences. No further evidence of articulating or enforcing expectations was submitted.

| Standard 4b - Respecting School Autonomy | | 0 | 1 | 2 | 3 | 4 |
|---|--|----------|----------|----------|----------|-------------|
| Sub-standards | | | | | | |
| i. | Respects the school's authority over its day-to-day operations. | | | | | 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. | | 1 | | | |
| iii. | Periodically 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. | 0 | | | | |
| iv. | Refrains from directing or participating in educational decisions or choices that are appropriately within a school's purview under the charter law or contract. | | | | | 4 |
| Standard Rating | | | | | | 2.25 |
| Evaluative Comments: | | | | | | |
| i. | There is no documented evidence of the authorizer compromising its schools' operational authority. | | | | | |
| ii. | As stated in the narrative, the authorizer collects two (2) required reports from its schools annually – a financial audit and an annual report – and notifies its schools of the requirement via its weekly charter email, though the date of this communication is outside of the review term. However, there was no further evidence of performance or compliance information being collected (e.g., staff and student rights, governance and reporting, fiscal management) to ensure its schools are protecting student and public interest. | | | | | |
| iii. | Neither the narrative nor documentation included evidence of the authorizer reviewing compliance requirements or evaluating the potential to increase school autonomy. | | | | | |
| iv. | There is no documented evidence of the authorizer directing or participating in educational decisions that are within the school's purview. | | | | | |

| 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. | | 1 | | | |
| 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, and gifted students. | | 1 | | | |
| iii. | Ensures clarity in the roles and responsibilities of all parties involved in serving students with disabilities. | | | 2 | | |
| 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 | | | | | | 1.25 |

| Evaluative Comments: | |
|-----------------------------|---|
| i. | While the authorizer's narrative states that charter schools submit proof of a certified lottery process to the TDOE, the documentation does not include evidence of the authorizer ensuring that action was completed. Additionally, the documentation does not make evident that the authorizer ensures its schools admit students through a random process that is open, public, and does not establish undue barriers to application, such as through a school policy audit or handbook review. |
| ii. | While two (2) email communications between the authorizer and a school regarding special education services were submitted, no further documentation, such as indicators on a current performance framework or monitoring reports, were provided to demonstrate that the authorizer ensures that schools provide access and services to all students, including English learners, homeless, foster care, migrant, and gifted students. |
| iii. | Though the authorizer's special education support document outlines the specific responsibilities and services the authorizer provides to its charter schools, there is no further evidence that the authorizer ensures its schools have defined roles for serving students with disabilities, such as through an executed charter agreement or monitoring report. |
| iv. | While the authorizer submitted two (2) charter agreements for review, the agreements for the two (2) randomly selected schools, as required for this standard, were not submitted. Therefore, alignment to this sub-standard could not be determined. For the purpose of continuous improvement only, the State Board reviewed the charter agreements that were incorrectly submitted and determined that, while the submitted agreements set expectations for the school's discipline and enrollment processes, no further documentation was provided demonstrating that |

authorizer ensures these expectations are met. Additionally, the documentation does not include evidence of ensuring its schools have a clear process for addressing parent/community grievances.

| 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. | Gives schools clear, adequate, evidence-based, and timely notice of contract violations or performance deficiencies. | N/A | | | | |
| iii. | Allows schools reasonable time and opportunity for remediation in non-emergency situations. | | | | | |
| iv. | Applies professional discretion when intervention is needed and considers context and a range of effective solutions. | | | | | |
| v. | Where intervention is needed, 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. | | | | | |
| Standard Rating | | | | | | 3 |
| Evaluative Comments: | | | | | | |
| i. | While the authorizer’s policy and procedures manual includes an intervention process document that outlines the possible triggers, actions, and consequences for sub-standard performance, there is no evidence that the manual or process has been communicated to schools. While this did not impact the score, the authorizer informed the State Board that, though an intervention process has existed since 2019, its schools have not received any interventions. The authorizer will need to implement a performance framework and a comprehensive compliance and monitoring system to determine if and when intervention is needed. | | | | | |
| ii. | N/A – As stated in the authorizer’s narrative, the authorizer does not have record of intervention or notices concerning its existing schools. | | | | | |
| iii. | N/A – As stated in the authorizer’s narrative, the authorizer does not have record of intervention or notices concerning its existing schools. | | | | | |
| iv. | N/A – As stated in the authorizer’s narrative, the authorizer does not have record of intervention or notices concerning its existing schools. | | | | | |
| v. | N/A – As stated in the authorizer’s narrative, the authorizer does not have record of intervention or notices concerning its existing schools. | | | | | |

| Standard 4e - Public Reporting | | 0 | 1 | 2 | 3 | 4 |
|---------------------------------------|---|----------|----------|----------|----------|----------|
| Sub-standards | | | | | | |
| i. | Produces an annual public report that provides clear, accurate performance data for the charter schools it oversees and reports on individual school and overall portfolio performance according to the framework set forth in the charter agreement in accordance with State law. | | 1 | | | |
| Standard Rating | | | | | | 1 |
| Evaluative Comments: | | | | | | |
| i. | While the 2019 and 2020 annual reports demonstrate that the authorizer reports on its individual schools, there is no evidence that the reports are publicly shared. Additionally, the reports only include academic performance data and are not aligned to a performance framework, as required. Furthermore, while the authorizer submitted two (2) charter agreements for review, the agreements for the two (2) randomly selected schools, as required for this standard, were not submitted. Therefore, alignment between the annual report and the charter agreement cannot be determined. | | | | | |

Charter School Authorizer Evaluation 2021
Authorizer: Hamilton County Schools

| Standard 5a - Revocation | | 0 | 1 | 2 | 3 | 4 |
|---------------------------------|--|----------|----------|----------|----------|----------|
| Sub-standards | | | | | | |
| i. | Revokes a charter during the charter term if there is clear evidence of extreme underperformance or violation of law or the public trust that imperils students or public funds, in accordance with state law. | | | | 3 | |
| ii. | Does not make revocation decisions on the basis of political or community pressure. | N/A | | | | |
| Standard Rating | | | | | | 3 |
| Evaluative Comments: | | | | | | |
| i. | While the authorizer’s policy and procedures manual state the reasons a school’s charter can be revoked, a full revocation policy or process, which clearly states the steps and responsibilities the authorizer takes when considering revocation, was not included. Additionally, while this did not impact the evaluation rating, the State Board recommends aligning the reasons for revocation stated in the manual and the charter agreement with the exact language of state law. | | | | | |
| ii. | N/A – The authorizer did not consider revocation during the review term. | | | | | |

| Standard 5b - Renewal Decisions Based on Merit and Inclusive Evidence | | 0 | 1 | 2 | 3 | 4 |
|--|--|----------|----------|----------|----------|-------------|
| Sub-standards | | | | | | |
| i. | Bases the renewal process and renewal decisions on thorough analyses of a comprehensive body of objective evidence defined by the performance framework in the charter agreement. | | | 2 | | |
| ii. | 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. | | 1 | | | |
| iii. | Does not make renewal decisions on the basis of political or community pressure or solely on promises of future improvement. | | 1 | | | |
| Standard Rating | | | | | | 1.33 |
| Evaluative Comments: | | | | | | |
| i. | While the renewal report includes evidence that the authorizer followed a process that consisted of an application and school performance review by a review team, there is no documentation of a renewal process or decision criteria being communicated with its schools. Additionally, the charter agreement for the randomly selected school for this standard was not provided and therefore it could not be determined if the evidence considered in the renewal report aligned to the performance framework defined in the charter agreement. | | | | | |
| ii. | While the renewal report for the randomly selected charter school recommended renewal based on an analysis of the school's academic, financial and organizational performance, the documentation does not include evidence of the local board of education's decision either through board meeting minutes or a decision letter. Additionally, the charter agreement for the randomly selected school was not provided; therefore, it could not be ascertained if the renewal decision was aligned to the standards and targets stated in the charter agreement. | | | | | |
| iii. | While the narrative states that the renewal of the randomly selected school was approved by the local board of education, no further documentation regarding the renewal decision, such as board meeting minutes or a decision letter, was provided. | | | | | |

Charter School Authorizer Evaluation 2021
Authorizer: Hamilton County Schools

| Standard 5c - Cumulative Report and Renewal Application | | 0 | 1 | 2 | 3 | 4 |
|--|---|----------|----------|----------|----------|----------|
| Sub-standards | | | | | | |
| i. | Provides to each school, in advance of the renewal decision, 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. | | | 2 | | |
| ii. | Requires any school seeking renewal to apply for it through a renewal application, which provides the school a 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. | | | 2 | | |
| Standard Rating | | | | | | 2 |
| Evaluative Comments: | | | | | | |
| i. | While the renewal report for the randomly selected school for this standard includes a summary of the school’s academic performance over the charter term, it is unclear if the financial and organizational summaries are also representative of the charter term. Additionally, while the report clearly states that the school was recommended for renewal, no further documentation was provided to make evident if or when the report was provided to the respective school. | | | | | |
| ii. | As documented by the renewal application for the randomly selected school, the authorizer requires schools to submit the TDOE’s renewal application in alignment with state law. However, the documentation does not make evident if the school was provided time to respond to the renewal report, to correct the record, if needed, or to present additional evidence regarding its performance. | | | | | |

| Standard 5d - Fair, Transparent Process | | 0 | 1 | 2 | 3 | 4 |
|--|--|----------|----------|----------|----------|------------|
| Sub-standards | | | | | | |
| i. | Clearly communicates to schools the criteria for charter revocation, renewal, and non-renewal decisions that are consistent with the charter agreement, including any policy changes thereto. | | 1 | | | |
| ii. | Promptly notifies each school of its renewal (or, if applicable, revocation) decision, including written explanation of the reasons for the decision. | | 1 | | | |
| iii. | Promptly communicates renewal or revocation decisions to the school community and public within a time frame that allows parents and students to exercise choices for the upcoming school year. | | 1 | | | |
| iv. | Explains in writing any available rights of legal or administrative appeal through which a school may challenge the authorizer's decision, including appeal to the Tennessee Public Charter School Commission. | | | 2 | | |
| v. | Regularly updates and publishes the process for renewal decision making, including guidance regarding required content and format for renewal applications. | | | 2 | | |
| Standard Rating | | | | | | 1.4 |

Evaluative Comments:

| | |
|------|--|
| i. | While the reasons for revocation are outlined in the authorizer's policy and procedures manual, no further evidence was provided to demonstrate clear communication with schools regarding revocation. Additionally, the documentation does not include a policy, process, or evidence of communication with its schools regarding its renewal decision criteria. Furthermore, while the authorizer submitted two (2) charter agreements for review, the agreements for the two (2) randomly selected schools, as required for this standard, were not submitted. Therefore, it could not be ascertained if its decisions are consistent with the agreement. |
| ii. | While the authorizer's narrative states that renewal decisions are posted to the authorizer's website after the local board of education votes, no documentation was provided demonstrating the prompt notification of its renewal decision, including a written explanation of the reasons, to the randomly selected school for this standard. |
| iii. | While the authorizer's narrative states that renewal decisions are posted to the authorizer's website after the local board of education votes, no documentation was provided demonstrating communication with the public, such as the board meeting minutes or screenshot of the board's vote on its website, regarding a renewal decision. |
| iv. | While the authorizer utilizes the state's required renewal application, which includes information about the right to an appeal an authorizer's decision, the documentation does not include any communication from the authorizer regarding appeal rights, such as through a renewal process/policy document or stated within a renewal report. |

- v. While the authorizer utilizes the state's regularly updated renewal application, the documentation does not include evidence of a policy/process for renewal decision making or that the authorizer shares renewal process information with its schools.

| Standard 5e - Closure | | 0 | 1 | 2 | 3 | 4 |
|------------------------------|---|----------|----------|----------|----------|----------|
| Sub-standards | | | | | | |
| i. | In the event of a school closure, oversees and works 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. | | | 2 | | |
| Standard Rating | | | | | | 2 |
| Evaluative Comments: | | | | | | |
| i. | While the authorizer’s policy and procedures manual contain an overview of its closure procedure, including goals and a timeline with general steps (e.g., develop/monitor implementation of closure plan and to finalize governance and operations affairs, financial affairs, and reporting affairs), the closure action plan, noted as Appendix B in the manual, was not provided. Additionally, the manual does not mention the steps of notifying parents, transition of student records, or disposition of funds. The authorizer did not oversee a school closure during the review term, so only its process documents were evaluated. | | | | | |

| Standard 6 - Advanced Standards (Bonus) | | 0 | 1 | 2 | 3 | 4 |
|--|--|----------|----------|----------|----------|------------|
| Sub-standards | | | | | | |
| i. | Ensures authorizing is visible, adequately resourced, and the people responsible for day-to-day authorizing functions have input over decision making. | | | 2 | | |
| ii. | Articulates and implements an intentional strategic vision and plan for chartering, including clear priorities, goals, and time frames for achievement. | 0 | | | | |
| iii. | Evaluates its work regularly against its chartering mission and strategic plan goals and implements plans for improvement when falling short of its mission and strategic plan. | | 1 | | | |
| iv. | Provides an annual public report on the authorizer's program and performance in meeting its strategic plan goals. | | 1 | | | |
| v. | Broadly invites and solicits charter applications while publicizing the authorizer's strategic vision and chartering priorities, without restricting or refusing to review applications that propose to fulfill other goals. | 0 | | | | |
| <i>Standard Rating</i> | | | | | | 0.8 |
| Evaluative Comments: | | | | | | |
| i. | Based on the outcomes of the relevant sub-standards to assess 6i, the authorizer addressed but did not satisfy all of the selected sub-standards. ³ | | | | | |
| ii. | The authorizer's documentation does not include evidence of a strategic vision, plan, or goals for chartering. | | | | | |
| iii. | While the authorizer has an established mission and submitted draft documents pertaining to several areas of authorizing, such as oversight and monitoring, annual evaluations, and renewals, there is no evidence of evaluating its work against its mission or establishing a strategic plan or goals. | | | | | |
| iv. | While the 2019 and 2020 annual reports include information on the authorizer's academic program, the documentation does not include information on its schools organizational or financial programs or information about the authorizer's performance in meeting its goals. Additionally, there is no evidence of the reports being shared publicly. | | | | | |
| v. | There is no evidence of the authorizer inviting or soliciting charter applications, such as by posting the application materials and guidance documents to its website. Additionally, the documentation does not include evidence of publicizing its chartering priorities. | | | | | |

³ The relevant sub-standards used to assess 6i include 1avi, 1avii, 1ci, 2bi, 2biv, 2di, 5aii, and 5bi.