



**Charter School Authorizer Evaluation Report**  
**Knox County Schools**  
**2021**

# Charter School Authorizer Evaluation 2021

Authorizer: Knox 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 (4<sup>th</sup>) 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"> <li>○ Hamilton County Schools</li> <li>○ Knox County Schools</li> <li>○ Shelby County Schools</li> </ul>
Cohort 2	<ul style="list-style-type: none"> <li>○ Achievement School District</li> <li>○ Metro Nashville Public Schools</li> <li>○ Tennessee Public Charter School Commission</li> </ul>

## 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;

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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 <u>but</u> 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	
<b>Authorizer:</b>	Knox County Schools (“KCS”)
<b>About the Authorizer:</b>	KCS is a district-level authorizer in Knox County. KCS’s first and only charter school opened in 2015 and its charter school currently serves approximately 0.07% of the district’s students.
<b># Operational Schools:</b> <b># Students Enrolled:</b>	1 school in the 2020-21 school year 450 students in the 2020-21 school year
<b># Approved School(s) in Development:</b> (name and planned opening year)	0 schools in development
<b>Closed Schools:</b> (name and year closed)	0 schools closed since September 1, 2019
Evaluation Summary	
<p><b>Identified Areas of Strength</b></p> <ul style="list-style-type: none"> <li>• The authorizer employs competent personnel at a staffing level that is appropriately funded through efficient use of the authorizer fee and sufficient in scale to support its single charter school.</li> <li>• The authorizer implements a quality new-start application process that is aligned with state guidelines, is transparent and clearly communicated, follows rigorous approval criteria for applicants, and is open to all.</li> <li>• The authorizer executes a charter agreement with its charter school that articulates the rights and responsibilities of each party regarding school autonomy, funding, administration and oversight, and other material terms.</li> </ul> <p><b>Identified Areas for Growth</b></p> <ul style="list-style-type: none"> <li>• The authorizer evaluates its schools using a performance framework that is not clearly outlined as either an item within or as an exhibit of the charter agreement. Additionally, the performance framework does not set detailed organizational standards that define the essential elements of the educational program, hold the governing board accountable for operating and reporting requirements, ensure compliance with student and employee rights, and establish school environment expectations.</li> <li>• The authorizer does not implement 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.</li> <li>• The authorizer’s compliance monitoring system does not include evidence of ensuring its school provides access and services to all students as required by federal and state law.</li> </ul> <p><b>Required Follow Up Actions</b></p> <ul style="list-style-type: none"> <li>• Submission of a self-assessment in the 2022-23 school year, as required for all authorizers in a non-evaluation year.</li> </ul>	

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**Overall Ratings Summary**

Standard		Rating (0-4)	Average
1a	Planning and Commitment to Excellence	2.16	2.8
1b	Human Resources	3	
1c	Financial Resources	3.25	
2a	Application Proposal Information, Questions, and Guidance	3.67	3.45
2b	Fair, Transparent, Quality-Focused Procedures	4	
2c	Rigorous Approval Criteria	4	
2d	Rigorous Decision Making	2.16	
2e	Elements for Existing School Operators or Replicators (if applicable)	N/A	
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	4	2.67
3b	Rights and Responsibilities	3	
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	2.2	2.55
4b	Respecting School Autonomy	2.75	
4c	Protecting Student Rights	2	
4d	School Intervention	2.8	
4e	Public Reporting	3	
5a	Revocation	3.5	3
5b	Renewal Decisions Based on Merit and Inclusive Evidence	N/A	
5c	Cumulative Report and Renewal Application	2	
5d	Fair, Transparent Process	2.5	
5e	Closure	4	
6a	Advanced Standard (Bonus)	2.4	2.4
<b>Overall Rating</b>		<b>2.94</b> <b>Satisfactory</b>	

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<b>Standard 1a - Planning and Commitment to Excellence</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>					
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.			2		
iii. Defines external relationships and lines of authority to protect its authorizing functions from conflicts of interest and political influence.			2		
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.			2		
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.			2		
vii. Makes authorizing decisions that will result in positive student outcomes, in accordance with state law.	N/A				
<b>Standard Rating</b>					<b>2</b>
<b>Evaluative Comments:</b>					
i. While the charter school handbook and board policy address five (5) of the six (6) the purposes in charter school 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. <sup>1</sup>					
ii. While the documentation includes evidence of an annual presentation to the local board of education on the performance of its charter school, the presentation dates are outside of the review term and no further documentation was provided to demonstrate the board’s understanding of quality authorizing principles. Additionally, a professional learning log for three (3) of the authorizing staff members was provided; however, the documentation does not include evidence of professional development specific to authorizing for all staff included in the authorizer fee report.					

<sup>1</sup> 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 conflict-of-interest statements define external relationships and the documentation includes disclosure statements from the local board of education, signed disclosures were not provided for all authorizing staff. Additionally, the organization chart does not make evident the roles and responsibilities of those assigned to support its authorizing functions.
- iv. Eight authorizer goals are included in the handbook and the documentation includes examples of processes and practices aligned to most of these goals (e.g., posting handbook and annual reports publicly to promote transparency, providing access to professional development). However, some goals lack evidence of implementation (e.g., monitoring compliance with state and federal law), and the handbook does not streamline all requests made of the school, which may increase administrative burden.
- v. The authorizer completed a self-assessment as part of its evaluation and provided documentation of seeking feedback on its processes; however, 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. While the charter school handbook includes a mission statement, the statement is specific to the work of the charter school review committee rather than all authorizing responsibilities.
- vii. N/A – The authorizer did not make any new start, renewal, or revocation decisions during the review term.

<b>Standard 1b - Human Resources</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.				3	
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.					4
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.			2		
<b>Standard Rating</b>						<b>3</b>
<b>Evaluative Comments:</b>						
i.	While the job descriptions, resumes, and authorizer fee report demonstrate that the authorizer enlists competent leadership across most areas of charter school oversight (e.g., education leadership, special education, English learners, etc.) as defined by the sub-standard, the documentation does not include evidence of staff expertise in the areas of facilities or assessment. Additionally, not all job descriptions or resumes were provided for the 18 staff members at least partially funded by the authorizer fee.					
ii.	The authorizer’s organizational chart, authorizer fee report, and resumes illustrate at least 18 employees play some role in charter school oversight, which is sufficient to carry out authorizing responsibilities for the portfolio size.					
iii.	While the documentation includes evidence of an authorizer evaluation training with its local board of education, the training occurred outside of the review term and no further documentation was submitted. Additionally, though a professional learning log for three (3) authorizing staff members was submitted, the documentation does not demonstrate whether all 18 employees who are considered part of the authorizing staff receive on-going development related to quality authorizing practices.					



<b>Standard 1c – Financial Resources</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>					
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.				3	
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.				3	
iv. Annually reports the authorizing obligations fulfilled using the authorizer fee in accordance with state law.				3	
<b>Standard Rating</b>					<b>3.25</b>

<b>Evaluative Comments:</b>	
i.	The authorizer fee report includes clear descriptions (i.e., personnel responsibilities, NACSA membership) for its use of funds, which are appropriate given the size of the portfolio. However, the FY22 authorizing budget does not include an explanation of allocated revenue to cover the authorizing expenses that exceed the \$35,000 collected via the fee.
ii.	There is no evidence of an unaddressed conflict of interest.
iii.	The authorizer fee report and authorizing budget demonstrate effective use of all funds. The narrative provides context for determining an efficient use of funds through funding partial salary percentages based on time spent supporting the charter school rather than funding a full-time charter school position. However, the documentation did not include evidence of transparency, such as posting its authorizer fee report on the authorizer’s website or sharing it with the charter school.
iv.	While the 2020 authorizer fee report documents the obligations fulfilled by the authorizer fee, the 2019 authorizer fee report was not provided.

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<b>Standard 2a - Proposal Information, Questions, and Guidance</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.					4
ii.	Welcomes proposals from first-time charter applicants as well as existing school operators/replicators, while appropriately distinguishing between the two kinds of applicants in proposal requirements and evaluation criteria.					4
iii.	Encourages expansion of charter schools that demonstrate academic success, financial viability, organizational health, and capacity for growth.				3	
iv.	Encourages replication of charter schools that demonstrate academic success, financial viability, organizational health, and capacity for growth.				3	
v.	Considers diverse educational philosophies and approaches.					4
vi.	Requires applicants to demonstrate capacity to serve students with diverse needs, such as students with disabilities or learning exceptionalities and English learners.					4
<b>Standard Rating</b>						<b>3.67</b>

<b>Evaluative Comments:</b>	
i.	The authorizer's charter school handbook is publicly posted to its website and states the authorizer's chartering priorities. The authorizer utilizes the state's charter school application and scoring rubric, as required, which articulate the application questions and evaluation criteria and provide a frequently asked questions document as additional guidance.
ii.	The charter school handbook invites proposals from new and existing operators and is publicly posted to the authorizer's website. Additionally, the state's charter school application and scoring rubric set the requirements and evaluation criteria for both types of applicants.
iii.	The charter school handbook states that the authorizer "is seeking new or conversion charter schools," includes information about an amendment process, and is publicly posted to the authorizer's website. However, while an email to its charter school about the amendment process documents communication about the option to expand, the documentation does not include the amendment application or the criteria for expansion.

- iv. While the state's charter school application and scoring rubric include questions and evaluation criteria specific to operators applying to replicate an existing school, the authorizer's documentation does not include evidence of the authorizer 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. The state's scoring rubric contains criteria related to a research-based academic plan that aligns to the target population and mission, without prescribing the approach.
- vi. The state's charter school application contains questions related to serving students with diverse needs, and the state's scoring rubric contains criteria related to preparedness and capacity for serving special populations.

<b>Standard 2b - Fair, Transparent, Quality-focused Procedures</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
i.	Implements a charter application process that is open, well-publicized, and transparent, and is organized around clear, realistic timelines.	N/A				
ii.	Allows sufficient time for each stage of the application and school pre-opening process to be carried out with quality and integrity.					4
iii.	Explains how each stage of the application process is conducted and evaluated.					4
iv.	Communicates the education needs of the district, the charter authorizing processes, approval criteria, and decisions clearly to the public.					4
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.	N/A				
<b>Standard Rating</b>						<b>4</b>
<b>Evaluative Comments:</b>						
i.	N/A – The authorizer did not review any applications during the 2019-20 school year or the 2020-21 school year.					
ii.	The timeline provided in the charter school handbook and state’s charter school application allow for sufficient time between each stage of the application and pre-opening process.					
iii.	The charter school handbook and the state’s charter school application and scoring rubric include explanations for each stage of the application process. Additionally, a screenshot of the authorizer’s website, which includes frequently asked questions, demonstrates that the authorizer provides application assistance to applicants.					
iv.	The charter school handbook, which is publicly available via the authorizer’s website, documents the needs of the district and information about the authorizing processes. Additionally, the state’s scoring rubric provides the approval criteria for applicants and, though the authorizer did not review an application during the review term, the authorizer explained in its narrative that decisions would be posted to the local board of education’s meeting website.					
v.	N/A – The authorizer did not review any applications during the 2019-20 school year or the 2020-21 school year.					

<b>Standard 2c - Rigorous Approval Criteria</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.					4
ii.	Establishes distinct requirements and criteria for applicants who are existing school operators or replicators.					4
iii.	Establishes distinct requirements and criteria for applicants proposing to contract with educational service providers (ESPs), including charter management organizations.					4
<b>Standard Rating</b>						<b>4</b>
<b>Evaluative Comments:</b>						
i.	The state's charter school application and scoring rubric make evident each of the applicant requirements cited in this sub-standard, and the charter school handbook states that a capacity interview is included as part of the application process, thus allowing the authorizer an opportunity to ensure that applicants have the capacity to execute their plans successfully.					
ii.	The state's charter school application includes required questions for existing school operators or replicators, as outlined on page 4 of the application, and the scoring rubric establishes the criteria for approval.					
iii.	The state's charter school application contains required questions for applicants proposing to contract with educational service providers, and the state's scoring rubric establishes the criteria for approval.					

<b>Standard 2d - Rigorous Decision Making</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	
<b>Sub-standards</b>							
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, conducted by knowledgeable and competent evaluators.					4	
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.				3		
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.		1				
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.	N/A					
<b>Standard Rating</b>						<b>2.16</b>	
<b>Evaluative Comments:</b>							
i.	The charter school handbook establishes the approval criteria, in alignment with the state's scoring rubric, explaining that "every area [of the application] must meet or exceed the standard" to be recommended for approval and that the local board of education's decision is based on the recommendation of the authorizer's review team. Additionally, the board policy outlines additional expectations for applications beyond those outlined in the state's scoring rubric. While this did not impact the score, the State Board recommends noting in the board policy that any additional expectations shall not be used as the sole reason for denial of a charter school application.						

- ii. The application process stated within the charter school handbook includes an evaluation of the application and a capacity interview. The board policy outlines the additional priorities that the board will consider when reviewing an applicant's experience and capacity, the due diligence it will conduct, and a list of qualified individuals from within the district and the community who will serve on the review committee.
- iii. The board policy lists the individuals who will serve on the review committee, including internal and external evaluators with relevant educational, organizational, financial, and legal experience. However, the documentation does not include a process for ensuring its evaluators understand charter school autonomy and accountability.
- iv. While the documentation includes a sample training deck from another authorizer and the narrative states, "KCS will create its own model for future review purposes," no additional documentation demonstrating the authorizer's established process or policy for training its evaluators was provided.
- v. While the narrative states that the authorizer requires full disclosure of conflicts of interest from reviewers and signed conflict of interest forms were submitted for a sampling of staff, there is no documented language in policy, the authorizer handbook, or another related document to demonstrate this expectation.
- vi. N/A – The authorizer did not review any applications during the review term.

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<b>Standard 2e - Elements for Existing School Operators or Applications (if applicable)</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>					
i. Provide clear evidence of their capacity to operate new schools successfully while maintaining quality in existing schools;	N/A				
ii. Document their educational, organizational, and financial performance records based on all existing schools;					
iii. Explain any never opened, terminated, or non-renewed schools (including terminated or non-renewed third-party contracts to operate schools);					
iv. Present their growth plan, business plan, and most recent financial audits;					
v. Meet high standards of academic, organizational, and financial success to earn approval for replication; and					
vi. Document any current or past litigation and the resolution of such litigation.					
<b>Standard Rating</b>					<b>N/A</b>
<b>Evaluative Comments:</b>					
This standard is N/A. The authorizer did not review any applications during the review term.					



<b>Standard 2f - Elements for Applicants Proposing to Contract with Educational Service Providers, including Charter Management Organizations (if applicable)</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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			N/A		
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.					
<b>Standard Rating</b>						<b>N/A</b>
<b>Evaluative Comments:</b>						
This standard is N/A. The authorizer did not review any applications during the review term.						

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<b>Standard 3a - Charter Agreement Term, Negotiation, and Execution</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
i.	Executes a charter agreement with a legally incorporated governing board independent of the authorizer.					4
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.				3	
iii.	Defines material and non-material terms of the charter agreement.					4
iv.	Ensures mutual understanding and acceptance of the terms of the charter agreement by the school's governing board.					4
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.					4
<b>Standard Rating</b>						<b>3.8</b>

**Evaluative Comments:**

- i. The charter agreement explicitly names the independent governing body and authorizer in the first paragraph of the contract.
- ii. Section 1.2 of the charter agreement states the agreement is effective for 10 years after opening, unless terminated or renewed, and section 1.4 states that the authorizer shall conduct an interim review at the end of the fifth year. However, section 1.4 also states that the authorizer shall “periodically report” on the school’s progress rather than annually, as required by this sub-standard.
- iii. The material and non-material terms are outlined in section 11 of the charter agreement. Though this did not impact the score, the State Board recommends amending the charter agreement to ensure that all material terms included in the TN Public Charter School Commission’s amendment petition rule are stated in the charter agreement.
- iv. The signatures of the local board of education’s chair and the governing board president ensure mutual understanding and acceptance of the charter agreement.
- v. Section 11 of the charter agreement outlines the requirements for an amendment (e.g., changes to the mission, location, enrollment) and changes that do not require amendments to the agreement (e.g., changes to the budget, mailing address, school leader).

<b>Standard 3b - Rights and Responsibilities</b> Sub-standards	0	1	2	3	4
i. Executes charter agreements that clearly: <ul style="list-style-type: none"> <li>a. State the rights and responsibilities of the school and the authorizer;</li> <li>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;</li> <li>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;</li> <li>d. State the statutory, regulatory, and procedural terms and conditions for the school’s operation;</li> <li>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;</li> <li>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</li> <li>g. State the responsibilities of the school and the authorizer in the event of school closures.</li> </ul>				3	
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.				3	
<b>Standard Rating</b>					<b>3</b>
<b>Evaluative Comments:</b>					

- i. The charter agreement states the rights and responsibilities, respects autonomies (e.g., authority to decide educational program matters not explicitly stated in agreement, responsibility for financial management/budgeting), cites law in defining renewal, non-renewal, and revocation, includes statutory and regulatory obligations and pre-opening requirements, states responsibility to adhere to public education obligations, and states the responsibilities of the school in the event of closure. However, the agreement does not include performance standards for intervention, outside of acknowledging calls for corrective action and the ability to cure non-compliance, the criteria for renewal, or the authorizer's responsibilities in the event of closure.
- ii. Section 9.2 of the charter agreement affirms that the parties may enter into separate fee-for-services agreements and that entering such agreements shall not be grounds for revocation or non-renewal, as required in State Board rule. However, the documentation did not include a fee-based service agreement to affirm that the service agreement respects charter school autonomy and treats the school equitably compared to district schools.

<b>Standard 3c - Performance Standards</b> Sub-standards	0	1	2	3	4
i. Executes charter agreements that plainly: <ul style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>c. Include expectations for appropriate access, education, support services, and outcomes for students with disabilities;</li> <li>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;</li> <li>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;</li> <li>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</li> <li>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.</li> </ul>		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"> <li>a) Academic Performance               <ul style="list-style-type: none"> <li>1. Set expectations for student academic achievement status or proficiency, including comparative proficiency;</li> </ul> </li> </ul>		1			

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

- i. While section 1.4 of the charter agreement states that the school shall be evaluated based on the indicators within the charter school application and as reported on the state report card, a separate performance framework document is not referenced nor incorporated into the agreement. Furthermore, while legal grounds for nonrenewal are cited in the agreement, the measurable targets required for renewal or how the performance framework informs renewal is not included. Sources for academic, organizational, and financial data to inform ongoing and renewal evaluation decisions are also not included.
- ii. While it is unclear if the charter school is accountable to application goals or performance framework indicators (or both), the current performance framework does not include an option to incorporate mission-specific performance measures, allow adequate evaluation of short- and long-term financial sustainability, or any organizational performance requirements as stated in this sub-standard, outside of partially evaluating fiscal management through a review of audit findings.

<b>Standard 3d - Provisions for Educational Service Provider (ESP) Within Charter Agreement (if applicable)</b> <b>Sub-standards</b>	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: <sup>2</sup> <ol style="list-style-type: none"> <li>a. Clearly establish the primacy of the charter agreement over the ESP contract;</li> <li>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;</li> <li>c. Prohibit the ESP from selecting, approving, employing, compensating, or serving as school governing board members;</li> <li>d. Provide for sufficient transparency around the spending of public monies; and</li> <li>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.</li> </ol>	N/A				
<b>Standard Rating</b>					<b>N/A</b>
<b>Evaluative Comments:</b>					
This standard is N/A. The charter school does not contract with an ESP provider.					

<sup>2</sup> The standard only applies to contracts with ESPs that have substantial responsibility for education, operational, and financial operations such as for payroll, textbooks, curriculum, etc.



<b>Standard 3e - Provisions for ESP Contract</b> 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.					
<b>Standard Rating</b>	<b>N/A</b>				
<b>Evaluative Comments:</b>					
This standard is N/A. The charter school does not contract with an ESP provider.					

<b>Standard 4a - Performance Evaluation and Compliance Monitoring</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>					
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.					4
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.					4
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.				3	
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.			2		
x. Articulates and enforces stated consequences for failing to meet performance expectations or compliance requirements.			2		
<b>Standard Rating</b>					<b>2</b>

**Evaluative Comments:**

- i. While section 1.4 of the charter agreement states that the authorizer shall monitor and periodically report on the charter school's progress in relation to measures in the charter school application and state report card, the authorizer-produced annual report is based on a different authorizer-created performance framework. Furthermore, organizational compliance indicators, such as special education, English learners, enrollment, governance, etc., are not included in the authorizer annual report or performance framework; therefore, the authorizer's accountability and monitoring system does not include all of the information necessary to make rigorous renewal, revocation, and intervention decisions. School leaders confirmed that they were unaware of the school's renewal status or the criteria for renewal.
- ii. While the charter school handbook outlines five (5) reporting requirements, it does not appear to be inclusive of all requested items from the charter school (e.g., separate email requests for staffing and licensure data and child abuse reporting were provided). Additionally, the list included in the handbook also does not include set dates for all items (e.g., board training documentation) nor provide information on how or to whom they should be submitted.
- iii. While the authorizer's performance framework and annual reports demonstrate streamlining of certain expectations (e.g., state academic performance expectations, audit completion), there are federal and state expectations outlined in the charter agreement (e.g., special education, English learners, discipline due process) that are not incorporated into the accountability system. Furthermore, the documentation includes evidence of additional reporting requests sent via email that are separate from the requirements in the charter school handbook, which does not minimize reporting burdens.
- iv. The documentation includes evidence of the authorizer providing training information in response to a request from its charter school, as well as summary notes from a charter support call hosted by the Tennessee Department of Education ("TDOE") regarding changes to laws, policies, and programs. Additionally, the school leaders confirmed that the authorizer provides technical support, when requested.
- v. While the charter school handbook states that the authorizer will conduct at least two (2) site visits per year, the documentation does not include a process or protocol that defines these site visits as a means of collecting monitoring and compliance data in accordance with the charter agreement. Additionally, an email documenting a site visit to "see the school and ask some general questions" from a new staff member is the only evidence of a site visit during the review term. Furthermore, the documentation does not include evidence of the authorizer minimizing administrative burden or avoiding operational interference as its site visits are not clearly defined through a process or protocol.
- vi. While the authorizer's annual reports demonstrate an evaluation of the school's performance, the authorizer-created annual report is based on a different performance framework than what is referenced in the charter agreement. Additionally, though board website screenshots affirm the charter school annual report is shared with the local board of education, there is no further evidence of the performance report being communicated to the school's governing board and school leadership, outside of an email saying they should receive the results. Furthermore, essential compliance requirements, such as accountability metrics for special education, English learners, or discipline due process, are not included in the annual evaluation.
- vii. The charter agreement, school FY20 audit, and the authorizer annual reports demonstrate the authorizer requires and reviews financial audits. While this did not impact the score, the authorizer should consider updating its financial performance indicators included in its annual report to include metrics so that its charter school knows which indicators are informed by the financial audit.
- viii. The weekly charter emails and monthly meetings demonstrate regular communication with its school leaders and the corrective action summary documents the authorizer's timely notice of a potential contract violation within three (3) days of receiving a complaint. However, there is no additional evidence demonstrating communication with the governing board regarding the corrective action incident.

- ix. The 2018-19 and 2019-20 annual reports document the authorizer's annual written report for its school. However, the documentation does not include a summary of the school's compliance to date or evidence of active communication with its school regarding its performance, beyond publicly posting the reports to its website.
- x. While the charter school handbook articulates a system for addressing inadequate performance and compliance deficiencies, only a summary of an incident is provided. Therefore, alignment with the system cannot be fully assessed.

<b>Standard 4b - Respecting School Autonomy</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.			2		
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.		1			
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
<b>Standard Rating</b>						<b>2.75</b>
<b>Evaluative Comments:</b>						
i.	The authorizer's back-to-school email allowing the school to opt into professional development opportunities and weekly communication emails with updates and deadline reminders demonstrate the authorizer's respect for the school's authority over its operations.					
ii.	While the charter school handbook includes five (5) reporting requirements, some of the requirements do not include a submission deadline. Additionally, the documentation includes emails with additional compliance reporting requests beyond what is listed in the handbook.					
iii.	While the narrative describes authorizing staff regularly meeting to reflect on authorizing and ways to increase autonomy, there is no further documentation to support examples of this. Additionally, while the authorizer created a new staff position focused on authorizing work, no further evidence was provided demonstrating that this role would review compliance requirements and evaluate the potential to increase school autonomy.					
iv.	The professional development emails inviting its school to opt into training opportunities demonstrate that the authorizer shares available opportunities without requiring attendance and leaves the decision to attend to the charter school.					

<b>Standard 4c - Protecting Student Rights</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.					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			
<b>Standard Rating</b>						<b>1.75</b>

<b>Evaluative Comments:</b>	
i.	While section 2.1 of the charter agreement addresses the school's enrollment process and an email about lottery compliance was submitted, the lottery compliance documentation was not included nor evidence of evaluating compliance; therefore, it could not be ascertained if the authorizer ensures all requirements of this sub-standard.
ii.	While the charter school agreement requires equitable access and inclusive services for special education and English learners and the school leaders and authorizer confirmed that special education support personnel are on campus often, the documentation does not include evidence of accountability systems such as compliance monitoring reports or as indicators on its performance framework. Additionally, the documentation does not include evidence of ensuring services for homeless, foster care, migrant, or gifted students.
iii.	Section 2.3 of the charter agreement outlines responsibilities of the authorizer (e.g., overseeing procedural compliance with federal and state law) and the charter school (e.g., being responsible for the provision of services following identification) in serving students with disabilities.
iv.	While the narrative states that the authorizer monitors discipline records and the authorizer's performance framework includes an indicator on suspension rates, there is no further evidence of actual evaluation of the school's discipline policies, due process, or a parent/community grievance process.

<b>Standard 4d - School Intervention</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.	Gives schools clear, adequate, evidence-based, and timely notice of contract violations or performance deficiencies.			2		
iii.	Allows schools reasonable time and opportunity for remediation in non-emergency situations.				3	
iv.	Applies professional discretion when intervention is needed and considers context and a range of effective solutions.			2		
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.			2		
<b>Standard Rating</b>						<b>2.6</b>

**Evaluative Comments:**

i.	The charter school handbook includes an intervention protocol, which contains five (5) status tiers ranging from “good standing” to “revocation,” reasons to escalate across the status tiers (e.g., failure to meet multiple performance targets), and the types of actions to follow (e.g., develop performance improvement plan). Receipt of this handbook was confirmed by the school leaders.
ii.	While the authorizer’s corrective action summary provides evidence of the authorizer providing timely notice and next steps in response to a complaint received about the school, the summary does not make evident that the authorizer explicitly informed the school of the contract violation or performance deficiency being addressed or provided the school with a timeline to submit the required corrective action plan.
iii.	The corrective action summary documents the authorizer allowing for reasonable time (20 days) to submit the requested documentation, as well as an opportunity for remediation in the form of a corrective action plan. However, no further information related to resolution was provided.
iv.	As stated in the charter school handbook, the authorizer may consider a range of solutions, such as a notice of concern, notice of deficiency, performance improvement plan, notice of probation, or a revocation review, when considering intervention actions. However, without further documentation beyond the corrective action summary, implementation of this expectation could not be fully evaluated.
v.	While the expectation that the school creates a corrective action plan as stated in the summary document confirms that the authorizer identified a need for intervention and preserved autonomy by allowing the school to create its own plan, there is no further documentation to affirm what was communicated to the school regarding the corrective action process or possible consequences for noncompliance.

<b>Standard 4e - Public Reporting</b> Sub-standards	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
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.				3	
<b>Standard Rating</b>					<b>3</b>
<b>Evaluative Comments:</b>					
i. The authorizer’s annual reports are publicly shared on its website, as demonstrated by a screenshot, and contain performance data for the school. However, the framework included in the reports does not align with the framework set forth in the charter agreement.					



<b>Standard 5a - Revocation</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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				
<b>Standard Rating</b>						<b>3</b>
<b>Evaluative Comments:</b>						
i.	The charter agreement states that the school can be revoked for any reason set forth in state law and that the authorizer “will follow a progressive system of notification and calls for corrective action.” However, no further documentation regarding this “progressive system” for revocation was provided. Additionally, while this did not impact the evaluation rating, the State Board recommends aligning the reasons for revocation stated in the charter school handbook with the exact language of state law.					
ii.	N/A – The authorizer did not consider revocation during the review term.					

<b>Standard 5b - Renewal Decisions Based on Merit and Inclusive Evidence</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.			N/A		
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.			N/A		
iii.	Does not make renewal decisions on the basis of political or community pressure or solely on promises of future improvement.			N/A		
<b>Standard Rating</b>						<b>N/A</b>
<b>Evaluative Comments:</b>						
i.	N/A - The authorizer did not have any schools facing renewal during the review term.					
ii.	N/A - The authorizer did not have any schools facing renewal during the review term.					
iii.	N/A - The authorizer did not have any schools facing renewal during the review term.					

<b>Standard 5c - Cumulative Report and Renewal Application</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
i.	Provides to each school, in advance of the renewal decision, a cumulative performance report that: <ul style="list-style-type: none"> <li>a. Summarizes the school’s performance record over the charter term; and</li> <li>b. States the authorizer’s summative findings concerning the school’s performance and its prospects for renewal.</li> </ul>	N/A				
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		
<b>Standard Rating</b>						<b>2</b>
<b>Evaluative Comments:</b>						
i.	N/A – The authorizer did not have any schools facing renewal during the review term.					
ii.	A hyperlink to the TDOE’s renewal application is included in the charter school handbook as well as a general process timeline. However, the timeline does not include evidence of when the charter school would receive a cumulative report, when the school would be required to submit a response, or a timeline for providing additional evidence regarding its performance, as required by this sub-standard.					

<b>Standard 5d - Fair, Transparent Process</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.			2		
ii.	Promptly notifies each school of its renewal (or, if applicable, revocation) decision, including written explanation of the reasons for the decision.	N/A				
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.	N/A				
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.	N/A				
v.	Regularly updates and publishes the process for renewal decision making, including guidance regarding required content and format for renewal applications.				3	
<b>Standard Rating</b>						<b>2.5</b>
<b>Evaluative Comments:</b>						
i.	While the charter agreement and charter school handbook discuss revocation, renewal, and non-renewal, the documentation does not include evidence of clear communication regarding the criteria for renewal decisions or the system for revocation either via a policy/process or as clearly stated within the charter agreement. Furthermore, the board policy states that renewal decisions will be based on the annual report without specifying further criteria, and school leaders confirmed that they do not know the criteria for renewal.					
ii.	N/A – The authorizer did not have any schools facing renewal or revocation during the review term.					
iii.	N/A – The authorizer did not have any schools facing renewal or revocation during the review term.					
iv.	N/A – The authorizer did not have any schools facing renewal or revocation during the review term.					
v.	The authorizer handbook, which is available publicly on the authorizer's website, includes guidance and a sample timeline for the authorizer's renewal process, which involves a letter of intent, renewal application, recommendation report, and a vote by the local board of education. However, the criteria for renewal decisions were not provided.					

<b>Standard 5e - Closure</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.					4
<b>Standard Rating</b>						<b>4</b>
<b>Evaluative Comments:</b>						
i.	Section 12.2 of the charter agreement and the charter school handbook acknowledge the obligation to fulfill all areas outlined in this sub-standard. Additionally, the handbook states that the authorizer will follow the closure action plan available on the TDOE's website in the event of a closure. The authorizer did not oversee a school closure during the review term so only its process documents were evaluated.					

<b>Standard 6 - Advanced Standards (Bonus)</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
i.	Ensures authorizing is visible, adequately resourced, and the people responsible for day-to-day authorizing functions have input over decision making.				3	
ii.	Articulates and implements an intentional strategic vision and plan for chartering, including clear priorities, goals, and time frames for achievement.			2		
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.				3	
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.				3	
<b>Standard Rating</b>						<b>2.4</b>
<b>Evaluative Comments:</b>						
i.	Based on the outcomes of the relevant sub-standards to assess 6i, the authorizer fully satisfied a majority of selected sub-standards. <sup>3</sup>					
ii.	The charter school handbook includes eight (8) goals for authorizing and the documentation included some evidence of implementing these goals. However, no timeframes for achievement or an intentional strategic vision beyond the stated goals were provided.					
iii.	While the narrative describes evaluating its authorizing work as part of this evaluation process, there is no evidence of evaluating its work outside of this evaluation or against its own mission, vision, and authorizing goals. Additionally, the documentation did not include evidence of implementing a plan for improvement when shortfalls are identified.					
iv.	While the authorizer's annual reports for 2018-19 and 2019-20 provide a publicly available on the authorizer's website and include a report on the authorizer's program, the documentation does not include a report on the authorizer's progress in meeting its goals.					
v.	While a screenshot affirms the authorizer's charter application request for proposals and the charter school handbook are publicly posted to the authorizer's website, there is no further evidence of engaging with potential applicants.					

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