



Charter School Authorizer Evaluation Report
Shelby County Schools
2021

Charter School Authorizer Evaluation 2021

Authorizer: Shelby County Schools

About the Charter School Authorizer Evaluations

In 2019, the General Assembly charged the State Board of Education (“State Board”) with conducting periodic evaluations of authorizers to determine authorizer compliance and evaluate quality. Tennessee 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;

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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	
Authorizer:	Shelby County Schools ("SCS")
About the Authorizer:	SCS is a district-level authorizer in Shelby County. SCS's first charter school opened in 2003 and its charter schools currently serve approximately 18% of the district's students.
# Operational Schools: # Students Enrolled:	56 schools in the 2020-21 school year 19,895 students in the 2020-21 school year
# Approved School(s) in Development: (name and planned opening year)	0 schools in development
Closed Schools: (name and year closed)	4 schools closed since September 1, 2019 <ul style="list-style-type: none"> • Kaleidoscope School of Memphis (2021) • Aster College Prep (2019) • City University School Boys Preparatory (2109) • Southwest Early College High School (2020)
Evaluation Summary	
Identified Areas of Strength <ul style="list-style-type: none"> • The authorizer implements a quality new-start application process that's aligned with state guidelines, is transparent and clearly communicated, follows rigorous approval criteria for applicants, and is open to all. • The authorizer follows a quality monitoring and intervention process that is clearly communicated to schools, promptly notifying schools of any violation of their charter agreement, allows time for resolution, and honors charter school autonomy. • The authorizer revokes a charter school when there is clear evidence of extreme underperformance, violation of law, or loss of public trust and does so without political influence or community pressure. 	
Identified Areas for Growth <ul style="list-style-type: none"> • The authorizer lacks a clear authorizing mission and relevant training for all members of its authorizing staff and board. • 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 for each of its schools. • The authorizer's documentation did not include evidence that it follows each step of its closure process to ensure timely notification to parents, orderly transition of students and student records to new schools, and the full disposition of school funds, property, and assets. 	
Required Follow Up Actions <ul style="list-style-type: none"> • Public recognition and highlighting authorizer best practices by the State Board. • Submission of a self-assessment in the 2022-23 school year, as required for all authorizers in a non-evaluation year. 	

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Overall Ratings Summary

Standard		Rating (0-4)	Average
1a	Planning and Commitment to Excellence	2.71	3.15
1b	Human Resources	3	
1c	Financial Resources	3.75	
2a	Application Proposal Information, Questions, and Guidance	3.67	3.72
2b	Fair, Transparent, Quality-Focused Procedures	3.8	
2c	Rigorous Approval Criteria	4	
2d	Rigorous Decision Making	3.16	
2e	Elements for Existing School Operators or Replicators (if applicable)	4	
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	3.00
3b	Rights and Responsibilities	3	
3c	Performance Standards	2	
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	3.6	3.63
4b	Respecting School Autonomy	3.75	
4c	Protecting Student Rights	3	
4d	School Intervention	3.8	
4e	Public Reporting	4	
5a	Revocation	4	3.28
5b	Renewal Decisions Based on Merit and Inclusive Evidence	3.33	
5c	Cumulative Report and Renewal Application	3.5	
5d	Fair, Transparent Process	3.6	
5e	Closure	2	
6a	Advanced Standard (Bonus)	2.6	2.60
Overall Rating		3.53 Exemplary	

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Standard 1a - Planning and Commitment to Excellence	0	1	2	3	4
Sub-standards					
i. Supports and advances the purposes of charter school law.				3	
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.				3	
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.					4
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.				3	
Standard Rating					2.71

Evaluative Comments:	
i.	The authorizer’s documentation included its Destination 2025 document, new start, renewal and revocation process documents, application decision letters, charter meeting agendas, and its school performance scorecards that demonstrate support for the purposes stated within the charter school law. However, while the authorizer advances certain purposes through communicating the new charter application process and the school scorecards on its website as well as including expansion criteria in its 2021 guidebook, there is less documentation for advancing purposes three (3), five (5), and six (6) of the charter school law. ¹
ii.	The evaluation board training demonstrates that the local board of education chair and superintendent attended a training regarding quality charter authorizing principles, and the professional development tracker affirms that all six (6) core staff members participated in at least one (1) (1) training

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.

- specific to authorizing during the review period. However, there is no further evidence that all board members or additional staff engaged in professional development specific to authorizing during the review period.
- iii. The documentation included a conflict-of-interest policy that states all key employees and senior management personnel complete a disclosure form annually, a disclosure form that is completed when reporting a conflict of interest, an organizational chart, and a blank conflict-of-interest form for charter school application reviewers. However, the documentation did not include signed disclosures from any members of the authorizing staff, board, or the external reviewers who serve on the charter authorizing review team.
 - iv. The 2021 guidebook includes the district's policies around its authorizing responsibilities, including authorization, charter school agreements, performance standards, renewal, revocation, and annual reporting. Additionally, the team goals and norms include stated goals for 2019-20 that are aligned to policies specific to accountability. The annual reports demonstrate implementation of the district's policies through the inclusion of each charter school's performance on the scorecard which measures academic, operations, and financial performance.
 - v. The authorizer completed a self-assessment as part of its evaluation; however, additional evidence related to evaluating work against standards outside an evaluation year and implementing improvement plans where needed is lacking.
 - vi. While the mission and vision document states that Shelby County Schools' ("SCS") mission is to "[prepare] all students for success in learning, leadership, and life," there is no further documentation that demonstrates the district or charter office has a mission that is focused on authorizing.
 - vii. Documentation related to a new charter application decision, a revocation decision, and two (2) renewal decisions demonstrate evidence-based decisions that support student success; however, in review of the authorizer's appeal history during the review term, the authorizer's decision to deny two (2) charter school applications was overturned on appeal by the State Board.

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.				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		
Standard Rating						3
Evaluative Comments:						
i.	According to the job descriptions and staff resumés, the authorizer employs experienced and competent leadership across most areas of charter school oversight (e.g., education leadership, instruction, assessment, special education, English learners) as defined by the sub-standard. However, the documentation did not demonstrate that the authorizer enlists expertise in facilities.					
ii.	The organizational chart displays six authorizing staff positions within the charter schools office and an additional 11 extended team members in other departments, which is sufficient to carry out authorizing responsibilities for the portfolio size. Additionally, during the school leader interview, participants agreed that the staffing model is appropriate and sufficient.					
iii.	While the professional development tracker shows that the six (6) authorizing office staff receive regular professional development and the evaluation board training demonstrates that the district's superintendent and board chair received relevant professional development regarding the authorizer evaluation, no further documentation was submitted to demonstrate whether the local board of education or the remaining authorizing staff receives on-going professional development related to quality authoring practices.					

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.					4
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.					4
Standard Rating						3.75
Evaluative Comments:						
i.	The annual authorizer fee reports and budgets include clear descriptions of the revenue and expenses for the authorizing office to fulfill its authorizing responsibilities and are appropriate for the portfolio size (e.g., nearly \$1.85 million received and spent in fiscal year 2020).					
ii.	There is no evidence of an unaddressed conflict of interest.					
iii.	The 2019 and 2020 authorizer fee reports and operating budgets demonstrate that the authorizer uses all collected funds to cover its obligations, publishes its annual budget and fee report via the Tennessee Department of Education’s (“TDOE”) website, and efficiently collects funds through two (2) payments made by its charter schools in October and February, as further explained in the narrative. However, the authorizer’s process for determining spending was not provided in the documentation.					
iv.	The annual authorizer fee reports for 2019 and 2020 include a breakdown of expenses fulfilled by use of the authorizer fee with all funds spent in alignment with state law.					

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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.					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
Standard Rating					3.67

Evaluative Comments:					
i.	Documentation provided by the authorizer included the state's charter school application and scoring rubric, a budget document, as well as screenshots of informational videos for applicants titled "What is a Charter School?" and "Charter School FAQs." Additionally, the authorizer's charter applicant informational presentation demonstrates how the authorizer provides information regarding its chartering priorities, the application, and clear guidance on the timeline and requirements for approval.				
ii.	The authorizer submitted screenshots of applicant resources on its website, including informational videos and applicant materials. Additionally, the authorizer's charter applicant informational videos, the charter school application, and scoring rubric distinguish between the required criteria for first-time charter applicants and existing operators.				
iii.	The authorizer utilizes the state's charter school application and scoring rubric, as required, and posts these documents on its website. The state's charter school application and scoring rubric require existing operators to demonstrate academic success, financial viability, organizational health, and capacity for growth in order to meet the standard for approval. The authorizer's 2020-21 Educational Priorities Document/Rubric ("EPDR") states that its main purpose "is to provide guidance to charter operators concerning expansion and growth opportunities" and includes				

enrollment and performance data across the district's neighborhoods and schools; however, no documentation was provided to demonstrate that this document is shared publicly.

- 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 documentation does not include evidence of the authorizer encouraging replication of charter schools, such as direct communication with high-performing 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.

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.					4
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.				3	
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.					4
Standard Rating						3.8

Evaluative Comments:

i.	The authorizer’s new school applicant informational email, charter applicant informational presentation, “charter chatter” newsletter, and the screenshot of the charter school application page on the authorizer’s website demonstrate an application process that is open, well-publicized, transparent, and organized around realistic timelines in alignment with state law.
ii.	In alignment with state law, the authorizer follows an 18-month timeline that allows sufficient time for each stage of the application process, including next-day notification to the applicant of the local board of education’s decision following the amended application vote. Additionally, the authorizer creates and publishes a more detailed annual application timeline for applicants via its website.
iii.	The authorizer’s charter applicant informational videos and 2021 guidebook explain how each stage of the application process is conducted and evaluated and contain links to the TDOE’s charter school application and rubric, as well as an overview of and timeline for the process of appealing a denial by the authorizer to the state.
iv.	A screenshot of the authorizer’s website shows the state’s charter school application and scoring rubric posted and the board meetings webpage demonstrate that the authorizer communicates the process, approval criteria, and decisions to the public. Additionally, the 2020-21 EPDR explains the district’s education needs, including the capacity, quality, and programmatic focus of its schools by neighborhood cluster; however, no documentation was provided demonstrating that this document is shared publicly.
v.	The decision letters and decision emails demonstrate the authorizer’s prompt notification of decisions and outline the applicant’s right to an appeal. The initial and final rubrics state the reasons for denial in each round, as applicable, so that applicants can decide if they wish to revise their plans, pursue an appeal of the final decision, and/or resubmit in the future.

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.					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
Standard Rating						4
Evaluative Comments:						
i.	The state's charter school application and scoring rubric make evident each of the applicant requirements cited in this sub-standard, and the capacity interview audio recordings for the two (2) randomly selected schools for this standard allowed the review team 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 state's 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.					

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.				3	
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.					4
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						3.16
Evaluative Comments:						
i.	The state's scoring rubric establishes the approval criteria for applicants to demonstrate the competence and capacity to operate a charter school, and the authorizer's decision letters state that the local board of education's decision for denial of the two (2) randomly selected schools for this standard were based on the review committee's evaluation of the respective application; however, in review of the authorizer's appeal history during the review term, two (2) charter school application decisions were overturned by the State Board.					
ii.	The authorizer's charter application reviewer training, 2021 guidebook, and capacity interview audio recordings demonstrate that the authorizer evaluates an applicant's written proposal and conducts an in-person interview to evaluate the applicant's experience and capacity. Additionally,					

fiscal impact reports, a neighborhood performance analysis, and public comments were provided as evidence of the authorizer conducting its due diligence around the applicants.

- iii. According to the charter application review teams' resumes, the authorizer engages highly competent teams of internal and external evaluators with relevant expertise and understanding of the principles of charter school autonomy and accountability.
- iv. The authorizer's charter application reviewer training demonstrates that the authorizer provides training to application reviewers to ensure consistent evaluations by reviewing the required criteria, discussing an example together, and providing an overview of the essential protocols and timeline necessary to complete the review; however, the documentation does not make evident that the authorizer trains its reviewers on conflicts of interest or the fair treatment of all applicants.
- v. While the documentation includes a conflict-of-interest questionnaire for reviewers to complete, the documentation does not include executed copies of the form from any reviewers or decision makers assigned to the applications selected within the review term.
- vi. The initial and amended final rubrics for the two (2) randomly selected schools for this standard were not recommended by the review team or approved by the local board of education, thus demonstrating that the authorizer denies applicants that it determines do not 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;					4
ii.	Document their educational, organizational, and financial performance records based on all existing schools;					4
iii.	Explain any never opened, terminated, or non-renewed schools (including terminated or non-renewed third-party contracts to operate schools);					4
iv.	Present their growth plan, business plan, and most recent financial audits;					4
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.					4
Standard Rating						4

Evaluative Comments:	
i.	As documented in the application for one (1) of the schools randomly selected for this standard, the authorizer required the existing operator to complete 2.11 which requests evidence of the operator's capacity to operate new schools while maintaining quality in its existing schools. The applicant of the second randomly selected school for this standard was not an existing operator and therefore was not evaluated.
ii.	As documented in the application for one (1) of the schools randomly selected for this standard, the authorizer required the existing operator to complete section 4, which requests documentation of the operator's education, organizational, and financial performance of its existing schools. The applicant of the second randomly selected school for this standard was not an existing operator and therefore was not evaluated.
iii.	As documented in the application for one (1) of the schools randomly selected for this standard, the authorizer required the operator to complete 2.11 and section 4 of the state's charter school application, which requires existing operators to explain any never opened, terminated, or non-renewed schools. The applicant of the second randomly selected school for this standard was not an existing operator and therefore was not evaluated.
iv.	As documented in the application for one (1) of the schools randomly selected for this standard, the operator completed 2.11, section 3, and section 4 of the state's charter school application, which requires existing operators to present a growth plan, business plan, and recent financial audits. The applicant of the second randomly selected school was not an existing operator and therefore was not evaluated.
v.	N/A – The application for the randomly selected school did not apply to replicate an existing school.
vi.	As documented in the application for one (1) of the schools randomly selected for this standard, the operator was required to document any current or past litigation and its resolution in section 4. The applicant of the second randomly selected school was not an existing operator and therefore was not evaluated.

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;	N/A				
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.					

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.					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.					4
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
Standard Rating						4

Evaluative Comments:

i.	The charter agreements for the two (2) randomly selected schools for this standard explicitly name the incorporated governing boards and the authorizer in the first paragraph of the contract.
ii.	According to the charter agreement submitted by the authorizer from 2017, the agreement shall expire at midnight on the last day of the tenth fiscal year (4. Term of Agreement) and shall receive an annual progress report and a five (5) year review (6. School Performance Framework). As stated in the 2021 charter agreement submitted by the authorizer, the agreement is for a term of ten years (4. Term of Agreement) and the charter school shall receive annual performance reports and a five (5) year review (7. School Performance Framework).
iii.	The material and non-material terms are outlined in section 3 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 charter agreement from 2017 demonstrates mutual understanding and acceptance of the agreement's terms with the signatures of the governing board chair, school director, district board chair, and superintendent. Upon document submission for this evaluation, the second randomly selected school's charter agreement was not yet fully executed. The agreement was signed by the governing board chair on August 31, 2021 and is awaiting signatures from the Shelby County Board of Education. It is recommended that charter agreements be fully executed within the first six months of the school year.
v.	Section 19 of the 2021 charter agreement and section 18 of the 2017 charter agreement outline the requirements for amending the charter agreement. In addition, the 2021 guidebook outlines the process for completing an amendment petition in alignment with state rule.

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. 				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	
Standard Rating						3
Evaluative Comments:						

- i. While most of the seven areas of the sub-standard are addressed in the charter agreements for the two (2) randomly selected schools for this standard, the agreements do not include the responsibilities of the school and authorizer in the event of a closure or the standards for intervention.
- ii. While the charter agreements for the randomly selected schools for this standard describe services the charter school may request from the authorizer, including transportation and food services, and that a separate contract setting forth mutual agreement would be established, the charter agreements do not explicitly state that purchasing such services is not a condition for approval, continuation, or renewal, as required in State Board rule. Additionally, documentation of any fee-based service agreements was not provided for review.

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; 				3	

<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					2
Evaluative Comments:					

- i. While the 2017 charter agreement includes the school performance framework as Exhibit B and the framework outlines the academic, operational, and financial performance indicators, the framework differs from the 2019-20 scorecard submitted for the school and no documentation reflecting this change was provided. Furthermore, while the 2021 charter agreement states that a performance framework exists and will be used, the charter agreement does not include the performance framework in the agreement or as an exhibit.
- ii. While there is a discrepancy between what is included in the charter agreement and the scorecards provided, as noted in evaluative comment i., the reference guides and the school performance scorecard presentation deck contain most of the outlined performance standards. The performance standards not included are providing an option to incorporate mission-specific metrics and defining the essential elements of the education program.

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 two (2) randomly selected schools for this standard do not contract with an ESP 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.

Standard 3e - Provisions for ESP Contract (if applicable)	0	1	2	3	4
Sub-standards					
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 two (2) randomly selected schools for this standard do not contract with an ESP provider.					

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.				3	
ii. Defines and communicates to schools the process, methods, and timing of gathering and reporting school performance and compliance data.					4
iii. Implements an accountability system that effectively streamlines federal, state, and local performance expectations and compliance requirements while protecting schools' legally entitled autonomy and minimizing schools' administrative and reporting burdens.					4
iv. 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.				3	
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.				3	
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.					4
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.				3	
x. Articulates and enforces stated consequences for failing to meet performance expectations or compliance requirements.					4
Standard Rating					3.6

Evaluative Comments:

- i. The sample notifications demonstrate that the authorizer collects accountability and compliance data and notifies its schools of any concerns regarding a range of monthly data reporting items (e.g., enrollment, attendance, truancy, etc.), and this practice was confirmed during the school leader interview. Additionally, assessing performance annually based on the framework to inform renewal, non-renewal, and revocation decisions and requiring an interim five (5) year review are stated within the standard charter agreement. However, while the standard charter agreement states that a charter school “shall annually achieve a score of ‘meets expectations’ on the framework or risk revocation or nonrenewal” and board policy provides the process and criteria for renewal and revocation decisions, the charter agreements for the two (2) randomly selected schools for this standard were not included.
- ii. The 2021 guidebook and reference guide include a breakdown of sources and required timelines for submission of performance and compliance data. The summer charter leader institute provides charter schools with explicit training on expectations and policy updates related to the process and methods of collecting data, including a link to an upload portal to submit required documentation.
- iii. The authorizer conducts several annual processes in alignment with its accountability system, including an annual site visit, an end-of-year close-out meeting, an annual report audit, and monthly data audits, which all work to streamline performance expectations and compliance requirements. Additionally, the 2021 guidebook sets forth submission timelines for required documentation, and the summer charter leader institute provides charter schools with an opportunity to review the expectations annually to minimize administrative burden.
- iv. The authorizer’s summer charter school leader institute provides technical assistance to principals, CEOs/board chairs, and operations managers, including guidance on the data sources for each of the indicators on its operations scorecard, updates to the authorizer’s annual processes, and any relevant changes in rule, policy, or law. During the school leader interview, leaders described several additional technical supports offered to schools, including assistance around topics such as student information system, ESSER funding, and Title I.
- v. While the annual site visit process provides an overview of the schedule and specific data requests needed from its charter school, the documentation does not include evidence of when the site visit process information is communicated or when the site visits occur. Furthermore, as part of the site visit process, schools are required to report on data that has already been obtained by the authorizer, and the documentation does not make evident the purpose of the classroom observations.
- vi. The cumulative scorecards and annual audit checklist make evident the authorizer’s annual evaluation of a school’s progress toward meeting the standard within the performance framework; however, no documentation was submitted to demonstrate how the authorizer communicates the evaluation results with the school’s governing board and leadership.
- vii. The 2019 and 2020 audits and the scorecards demonstrate the authorizer’s annual collection and review of fiscal audits from its charter schools. As noted in the narrative, the second randomly selected school for this standard opened in the 2020-21 school year and does not yet have a financial audit or annual report.
- viii. As stated in the narrative and confirmed during the school leader interview, the “charter chatter” newsletter is emailed to school leaders weekly, and the authorizer completes monthly data checks, notifying schools if they are out of compliance. Additionally, the intervention protocol included within the 2021 guidebook provides evidence of the types of notification that a charter school may receive as a result of a performance deficiency, and the notice of non-compliance demonstrates timely notification as the letter is dated June 4, 2021 and the complaint was received on May 26, 2021.
- ix. The annual reports, annual report checklists, and cumulative scorecards demonstrate the authorizer’s provision of written reports that summarize performance and compliance on the performance framework and progress toward goals outlined in the charter agreement; however, evidence of active communication with each school regarding the reports was not provided.

- x. Though neither of the randomly selected schools for this standard received intervention within the review term, sample intervention notifications and requests for corrective action plans were included as part of the documentation. Additionally, the intervention protocol and academic intervention support process document articulate stated consequences for failing to meet performance expectations and compliance requirements, including submission of a corrective action plan, additional site visits, and additional benchmark analysis. Though this did not impact the rating of this sub-standard, the evaluation team noted that neither document cites further consequences should deficiencies remain unresolved, such as the risk of revocation.

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.					4
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.				3	
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						3.75
Evaluative Comments:						
i.	There is no evidence showing the authorizer has compromised school autonomy over its daily operations. Additionally, the authorizer conducts mid-year and end-of-year surveys with a question specific to respecting school autonomy and earned a score of at least a 3 out of 4 on the surveys.					
ii.	The 2021 guidebook and reference guide include a link to an upload portal and provide details about all required performance and compliance information along with a timeline for collecting information.					
iii.	The mid-year and end-of-year survey questions evaluate the authorizer's goal of recognizing school autonomy; however, while the narrative describes reaching out to schools that rated questions below a three (3), no further documentation or evidence was provided to demonstrate that the authorizer evaluates the potential to increase school autonomy, such as a follow-up email or meeting agenda.					
iv.	The COVID-19 update emails demonstrate evidence of the authorizer refraining from directing educational choices by clearly communicating with schools what the district plans were and what options the charter schools had based on their autonomy (e.g., choice to close the school, operate 100% virtually, etc.).					

Standard 4c - Protecting Student Rights		0	1	2	3	4
Sub-standards						
i.	Ensures that schools admit students through a random selection process that is open to all students, is publicly verifiable, and does not establish undue barriers to application (such as mandatory information meetings, mandated volunteer service, or parent contracts) that exclude students as provided by federal, state, and local law.				3	
ii.	Ensures that schools provide equitable access and inclusive services to all students as required by applicable federal and state law, including, but not limited to, students with disabilities, English learners, homeless students, students in foster care, migrant students, and gifted students.			2		
iii.	Ensures clarity in the roles and responsibilities of all parties involved in serving students with disabilities.					4
iv.	Ensures that schools' student discipline policies and actions are legal, fair, and equitable and that no student is suspended, expelled, or counseled out of a school outside of that process, and that schools have a clear process for addressing parent/ community grievances.				3	
Standard Rating						3

Evaluative Comments:	
i.	The enrollment policies for this standard's randomly selected schools document the authorizer's requirement for schools to submit their enrollment and lottery processes for review. As shared in the document debrief, the authorizer reviews the policies and communicates with its charter schools when a process does not meet the requirements in law; however, evidence of ensuring this process occurs, such as through the scorecard or written notification, was not provided.
ii.	While the authorizer requires equitable access for homeless students through the collection of questionnaires and referrals and conducts trainings with its charter schools on inclusive services to students with disabilities, English learners, and students with 504 plans during its summer charter leader institute, the documentation does not make evident how the authorizer evaluates a school's service to homeless, foster care, migrant students, or gifted students; only English learners and students with disabilities are explicitly evaluated via the scorecard.
iii.	The reference guide, authorizing staff job descriptions, and special education excerpt from the charter agreement outline the specific roles and responsibilities of charter schools and authorizing staff in serving students with disabilities (e.g., have highly qualified special education teachers, maintain and implement all individualized education plans, etc.).
iv.	The student handbooks for the two (2) randomly selected schools for this standard contain their discipline policies, and the parent complaint flowcharts outline a process for addressing parent grievances; however, evidence of the authorizer ensuring that schools have a clear process for addressing parent/community grievances, such as through evidence of a school policy review or written notification, was not provided.

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.					4
iii.	Allows schools reasonable time and opportunity for remediation in non-emergency situations.					4
iv.	Applies professional discretion when intervention is needed and considers context and a range of effective solutions.					4
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.					4
Standard Rating						3.8

Evaluative Comments:

i.	While the 2021 guidebook is shared with charter schools annually (as confirmed during the school leader interview) and includes the intervention protocol that states the general conditions that may trigger intervention (e.g. failure to submit annual report, enrollment numbers outside of charter agreement) and types of actions (e.g. deficiency notice, corrective action plan) subsequently taken, the protocol does not include the consequence that schools may be at risk of revocation should an intervention step fail to remedy the problem, as stated in the authorizer's sample intervention notifications.
ii.	A notice of deficiency letter and corrective action plan template demonstrate that the authorizer provides schools with timely (within 2 weeks of identification) and evidence-based (cites legal source of noncompliance) notice of contract violations.
iii.	The corrective action plan template demonstrates that schools are typically provided 2-3 weeks from receipt of notice to submit their plan; a notification related to teacher licensure requests a corrective action plan within 2 weeks of the letter date, which demonstrates a reasonable timeline and is in alignment with the authorizer's process.
iv.	The exceptional education meeting email and subsequent training provides an example of the authorizer applying professional discretion when considering context and solutions by offering a training as part of a school intervention.
v.	Sample intervention notifications identify what the school must remedy (e.g., IDEA and teacher licensure compliance letters) while preserving school autonomy because the school is responsible for drafting the corrective action plan. The sample letters also state possible consequences for noncompliance, including requiring a corrective action plan and risk of revocation.

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.					4
Standard Rating						4
Evaluative Comments:						
i.	The annual reports for 2018-19 and 2019-20 are posted on the authorizer’s website, as made evident by the website screenshots, are emailed to its schools via the “charter chatter” newsletter and include clear performance data on its overall portfolio and individual schools based on the performance framework and in accordance with state law.					

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.					4
ii.	Does not make revocation decisions on the basis of political or community pressure.					4
Standard Rating						4
Evaluative Comments:						
i.	The board policy outlines the grounds for required and discretionary revocation of a charter agreement and the responsibility of the authorizer to conduct a review of the school's performance, as well as have a public hearing regarding the revocation. According to the revocation PowerPoint and board documents submitted, the randomly selected school for this standard met the grounds for revocation, and the decision was upheld by the State Board upon appeal.					
ii.	The local board of education's revocation decision letter and the State Board's decision to uphold the authorizer's revocation for this standard's randomly selected school make evident that the authorizer does not make revocation decisions on the basis of political or community pressure.					

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.				3	
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.				3	
iii.	Does not make renewal decisions on the basis of political or community pressure or solely on promises of future improvement.					4
Standard Rating						3.33
Evaluative Comments:						
i.	As outlined in the 2021 guidebook, the renewal process includes an application, evaluation of the school's performance, a site visit, a final report, and a hearing to ensure a thorough analysis of the comprehensive evidence. Additionally, the general renewal overview provides charter schools with guidance on the scoring determination and timeline. The renewal materials for the randomly selected school for this standard demonstrate alignment with the authorizer's renewal process; however, the charter agreement for the school was not provided to confirm the standard for renewal.					
ii.	While the renewal summary report and renewal decision for the randomly selected school for this standard demonstrate that the school met the standard for renewal as stated in the renewal overview presentation (e.g., only schools that have a score of 3 or higher on the academic, operational, and financial scorecards shall be approved for renewal), the standard for renewal is not stated within the board policy, and the charter agreement for this school was not provided. Therefore, it cannot be confirmed that the renewal decision was based on the standards and targets within the charter agreement.					
iii.	The decision to renew the randomly selected school for this standard was in alignment with the renewal report and documented evidence and does not demonstrate any political or community pressure having influenced the decision.					

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. 				3	
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.					4
Standard Rating						3.5
Evaluative Comments:						
i.	The cumulative renewal performance report summarizes the academic, financial, and operational performance throughout the charter term for this standard’s randomly selected school, and its prospect for renewal is identified in the final renewal report; however, there is no evidence this was communicated to the school at the onset of the renewal process.					
ii.	The board policy and charter renewal application demonstrate the requirement for charter schools to complete a renewal application, and the charter renewal grievance form documents the charter school’s option to respond to the cumulative report. The renewal documents for the randomly selected school for this standard demonstrate that the authorizer follows this process.					

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.				3	
ii.	Promptly notifies each school of its renewal (or, if applicable, revocation) decision, including written explanation of the reasons for the decision.				3	
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.					4
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.					4
v.	Regularly updates and publishes the process for renewal decision making, including guidance regarding required content and format for renewal applications.					4
Standard Rating						3.6

Evaluative Comments:	
i.	While the 2021 guidebook and board policy 1011 document the criteria for revocation, renewal, and non-renewal decisions and schools approaching the end of their charter term receive frequent communication as noted via the timeline and renewal overview presentation, the charter agreements of the randomly selected schools for this standard were not provided.
ii.	The revocation letter to the randomly selected school for this standard documents the authorizer's notification of the revocation two (2) days after the board decision and includes written reasons for the decision. The renewal decision letter for the selected school was sent via email one (1) day after the board decision; however, the decision letter does not include a written statement of the reasons of the renewal decision.
iii.	As documented by the renewal timeline and renewal documentation, as well as by the parent information session for the selected school's revocation, the authorizer promptly communicates renewal and revocation decisions to allow parents and students time to exercise choice ahead of the upcoming year.
iv.	The revocation letter and email demonstrate the authorizer's communication in writing regarding the selected school's right to an appeal. Additionally, the renewal overview presentation includes information about the right to appeal a non-renewal decision.
v.	The 2021 guidebook, renewal timeline posted to the authorizer's website, and board policy include revision dates that demonstrate the authorizer's regular review of and updates to the process for renewal decisions.

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.	The board policy outlines the closure process and the sample closure action plan makes evident that the authorizer and charter school will work together in the event of a closure; however, while the randomly selected school for this standard closed voluntarily, and therefore may have required an adjusted closure action plan, the documentation does not make evident any changes to the closure process or that the process was implemented beyond forming a transition team and taking some steps within the disposition of school funds.					

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.				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.			2		
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	
Standard Rating						2.6
Evaluative Comments:						
i.	Based on the outcomes of the relevant sub-standards to assess 6i, the authorizer fully satisfied a majority of the relevant sub-standards. ³					
ii.	While the 2019-20 team goals document the authorizer's priorities for that year, the documentation does not include a strategic vision beyond the goals nor any benchmarks and/or action steps to achieve the goal of its charter schools being among the top 25% of schools in the state by 2025.					
iii.	While the mid-year and end-of-year surveys gather data from charter schools regarding the authorizer's focus on school autonomy, the documentation does not include a chartering mission or strategic plan to evaluate against beyond team goals for 2019-20. Additionally, the documentation does not include evidence of the authorizer evaluating its work against these goals or implementing a plan for improvement when falling short of meeting its goals.					
iv.	While the authorizer's annual reports for 2018-19 and 2019-20 provide a public report on the authorizer's charter schools, the documentation does not include details about the authorizer's progress in meeting its strategic plan goals.					
v.	The EPDR demonstrates the authorizer's broad invitation to charter applicants while stating the authorizer's areas of need in terms of quality seats and capacity; however, while the Destination 2025 document is referenced within the EPDR, the 2025 goal is not stated or linked, and it is unclear if the EPDR is publicly shared.					

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