



TENNESSEE

PUBLIC CHARTER SCHOOL COMMISSION

**LEA RESULTS BASED
MONITORING UPDATE**

MARCH 21, 2024

RBM: RECAP

- September 2023: The Commission was selected for Level 3 RBM by TDOE for FY24; this required additional prework and LEA and school site visits.
- October 2023: Commission and school staff were trained on the RBM process, timelines, and deliverables.
- January 2024: The Commission submitted all monitoring prework for TDOE review.
- February 2024: TDOE conducted a daylong site visit at the Commission's office and half day site visits at Lester Prep and KIPP Antioch Middle.
- March 2024: TDOE debriefed the Commission on the conclusion of their monitoring and reviewed next steps to address findings.



RBM: HIGHLIGHTS

- TDOE praised the Commission for its organization and leadership and willingness to work with department staff as they navigated monitoring of our unique LEA.
- TDOE specifically praised KACPM's ESL program and staff for their knowledge and alignment of program implementation.
- Of the 25 relevant monitoring indicators, 16 indicators (two-thirds) had no findings.
- In total, 9 indicators had a combined 15 findings in the following areas: ESSA (6), IDEA (6), and Fiscal (3).
- Of the 15 findings, about half were minor, school-level implementation revisions to the uploaded documentation.
- No LEA level policy updates or major program changes are necessary.



RBM: FINDINGS OVERVIEW

Met Requirements

11

**Improvements
Recommended**

5

**Corrections
Needed (State)**

2

**Findings of
Non-Compliance (Federal)**

7



ESSA FINDINGS

Finding Topic	Finding Action	Finding Level	Finding Impact	
Title I: Family Engagement	<ul style="list-style-type: none"> Develop district level family engagement plan with parent input 	LEA	High	
Title III: ESL Staffing Ratio*	<ul style="list-style-type: none"> Submit staffing plan for 1:35 ESL teacher-student ratio 	LEA	High	
Title III: EL Direct Services*	<ul style="list-style-type: none"> Review and revise ESL school schedules submitted for RBM documentation 	School	Medium	
Title III: ILP Completion*	<ul style="list-style-type: none"> Review and revise school ILPs submitted for RBM documentation 	School	Medium	
Title III: WIDA Procedures*	<ul style="list-style-type: none"> Update KIPP's family handbook to remove "W-APT" reference 	School	Low	<input checked="" type="checkbox"/>
Title IX: Homeless Resource	<ul style="list-style-type: none"> Update KIPP's homeless posters with TPCSC contact information 	School	Low	<input checked="" type="checkbox"/>

**Denotes a state correction rather than federal finding of non-compliance.*



IDEA FINDINGS

Finding Topic	Finding Action	Finding Level	Finding Impact
RTI2 Procedures & Implementation*	<ul style="list-style-type: none"> Develop LEA RTI2 procedures, provide training, and submit evidence of implementation 	LEA	High
Extended School Year (ESY)	<ul style="list-style-type: none"> Revise IEP monitoring procedures to clarify process to determine ESY and provide training 	LEA	Medium
Child Find Process	<ul style="list-style-type: none"> Revise child find procedures to clarify timelines and provide training 	LEA	Medium
Isolation & Restraint*	<ul style="list-style-type: none"> Update procedures to align with changes to TCA and SBE Rule and provide training 	LEA	Medium
SWD Confidentiality*	<ul style="list-style-type: none"> Revise IEP procedures to clarify SWD-specific confidentiality and provide training 	LEA	Low
Behavior Plan Process*	<ul style="list-style-type: none"> Update procedures to clarify parent role in development of Behavior Intervention Plans (BIPs) 	LEA	Low

**Denotes a state correction rather than federal finding of non-compliance.*



FISCAL FINDINGS

Finding Topic	Finding Action	Finding Level	Finding Impact
General Fiscal	<ul style="list-style-type: none">Upload KIPP Nashville's HR policy handbook for TDOE review	School	Low
Compensation	<ul style="list-style-type: none">Revise and submit two school semi-annual certifications	School	Low
Equipment	<ul style="list-style-type: none">Revise and submit three school inventory lists with necessary updates	School	Medium



RBM: NEXT STEPS

- Early March 2024: Communicated finding action items, deliverables, and timeline to LEA and school teams.
- Late March 2024: Revise all necessary procedures and plans and submit to TDOE for review and approval.
- April 2024: Post approved procedures to Commission website and train all schools on changes.
- May 2024: Collect (1) parent input on newly developed LEA Family Engagement Plan and (2) RTI2 implementation evidence.
- June 2024: Post Family Engagement Plan to Commission website and close out FY24 RBM process with TDOE.
- Fall 2024: Monitor schools for implementation of ESL Staffing Plan; and collect RTI2 evidence, if needed.



RBM: LESSONS LEARNED

- The Commission has strong policies and procedures aligned to state and federal law which are updated on an annual basis.
- Our existing means of monitoring and oversight effectively manage program implementation overall, but tension to preserve school autonomy will likely lead to small findings.
- The LEA team is examining existing systems to build in additional checks for compliance without increasing the burden on schools (e.g., school-level monitoring, site visits, etc.).
- The fiscal team has identified several areas to streamline processes for procurement reporting, inventory tracking, and reimbursement schedules as a result of the RBM process.





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