Executive Director's Preliminary Recommendation
Charter School Renewal for Bluff City High School

Pursuant to Tennessee Code Annotated ("T.C.A.") § 49-13-121, Commission Policy 3.600,[1] and charter renewal guidance issued by the Tennessee Public Charter School Commission ("Commission") and the State Board of Education, the authorizer shall provide a school with the opportunity to make a clear and compelling case for renewal. As part of Commission Policy 3.600, following the public hearing and the review of the renewal application, the Executive Director of the Commission shall provide a final recommendation to the Commission. The Executive Director shall consider the Charter Renewal Application Review Committee Report, the Renewal Site Visit Report, and the public hearing in the final recommendation to the Commission.

Based on my review of the cumulative performance of the school, the additional information gathered by the Commission staff through the renewal process including the application and cumulative performance review, the site visit, I preliminarily recommend that Bluff City High School ("Bluff City") should not be renewed for a new, ten-year charter term.

STANDARD OF REVIEW

Pursuant to Commission Policy 3.600, the Commission staff completed a renewal application review process. The Commission assembled a renewal application review committee comprised of highly qualified internal and external evaluators with relevant and diverse expertise to evaluate each application. The Commission provided training to all review committee members to ensure consistent standards and fair treatment of all applications.

The Commission's Charter Renewal Application Review Committee utilized the Commission's Charter Renewal Application Scoring Rubric,[2] which is used by the Commission when evaluating an application for renewal. In alignment with the State Board of Education's Quality Authorizing Standards in Policy 6.111, the authorizer "[e]stablishes and clearly communicates a renewal policy which requires the thorough analysis of a school's comprehensive body of objective evidence defined by the performance framework and is consistent with the charter agreement and state law, including any policy changes thereto." In

[1] All Commission rules and policies may be found on the Commission's website.
[2] The Commission's Charter Renewal Application Rubric was updated in March 2026.

addition, the Commission is required to hold a public hearing in the district where the charter school is located and conduct a renewal site visit in the school's tenth year of its charter agreement.

The Commission has the ability to approve the charter school's renewal application, with authorization to continue under the Commission for a new ten-year charter term or deny the application. If denied, the school would close at the end of the 2026-2027 academic year.

PROCEDURAL HISTORY

1. Bluff City High School was opened in 2017 and was authorized by the Tennessee State Board of Education. Bluff City transitioned to the Commission in 2021 and serves 421 students in the 2026-27 school year.
2. The school underwent a five-year interim review in 2022, which resulted in the school earning an off-track for renewal status. In accordance with Commission Policy 3.400, the school was placed on intervention, Level 3 – Notice of Probationary Status, primarily for academic underperformance.
3. The school made improvements through the implementation of the plan of correction, and in January 2025, the Commission voted to remove probationary status for Bluff City and place it on Level 2 – Notice of Deficiency.
4. On December 1, 2025, the Commission provided the operator with a cumulative performance report outlining the school's performance over the charter term in alignment with the Commission's renewal criteria. The report indicated the school's off-track status for renewal.[3]
5. The governing board of IOTA Community Schools submitted a renewal application to the Commission on April 1, 2026.
6. The Commission's Review Committee independently analyzed and scored Bluff City's application using the Commission's Charter Renewal Application Scoring Rubric.
7. On June 17, 2026, the Commission's review committee conducted a capacity interview with the school leadership and governing board to address questions that arose from the review of Bluff City's cumulative performance and the submitted renewal application.
8. The Commission's Review Committee determined strengths and areas of question or concern of Bluff City's cumulative performance and renewal application, which served as the basis for the Charter Renewal Application Review Committee Report attached hereto

[3] The Commission's renewal criteria is outlined in Policy 3.600.

as **Exhibit A.**

9. On September 15, 2026, the Commission's Review Committee completed a full day site visit to Bluff City to interview stakeholders, further discuss the Charter Renewal Application Review Committee Report with school leadership, and observe classes.
10. The site visit team determined strengths and identified challenges and concerns during the site visit to Bluff City and outlined within the Renewal Site Visit Report attached hereto as **Exhibit B.**
11. The Executive Director of the Commission reviewed the record including the Charter Renewal Application Review Committee Report and the Renewal Site Visit Report to write a preliminary recommendation for Bluff City and outlined whether the school is on track to be renewed or non-renewed.
12. On November 16, 2026, the Commission staff will hold a public hearing at Bluff City High School in Memphis, Tennessee. At the public hearing, the Executive Director, sitting as the Commission's designee, will hear the school address the preliminary Executive Director's recommendation and hear public comment.
13. After the public hearing, the Executive Director will determine a final analysis of the Bluff City renewal record and complete a final Executive Director's Recommendation Report.

Commission Review Committee's Evaluation of the Application and Site Visit

Commission staff assembled a diverse review committee of internal and external experts to independently evaluate and score the Bluff City renewal application and cumulative performance. This review committee consisted of the following individuals:

Name	Title
Michelle Doane	External Consultant
Rebecca Ledebuhr	Data and Accountability Coordinator
Maggie Lund	Deputy Director of Authorizing

The Review Committee conducted a review of the Bluff City renewal application and cumulative performance in alignment with the Commission's Renewal Application Scoring Rubric and held a capacity interview. The strengths and weaknesses of the renewal application and cumulative performance are outlined in **Exhibit A**. The Review Committee also conducted a site visit to the school to evaluate the effectiveness of the school in alignment with the Commission's School Performance Framework, the school's cumulative performance and renewal criteria, and the challenges and concerns outlined within the Charter Renewal Application Review Committee Report. The full Renewal Site Visit Report is provided as **Exhibit B**. **Exhibit C** details comparative performance for the school that was also provided to the review committee as part of the

record.

The Review Committee finds that Bluff City High School has not demonstrated the consistent and sustained academic performance necessary to support renewal for an additional ten-year charter term. While the school demonstrates a stable school culture and sound financial stewardship, significant concerns remain regarding academic achievement, instructional rigor, and subgroup performance. The school has established several foundational conditions intended to support student success; however, the evidence indicates that academic outcomes have not yet reached a level sufficient to demonstrate consistent and sustained performance to warrant a new ten-year charter term.

The school's Analysis of Academic Success partially meets the standard due to persistent concerns regarding a lack of sustained improvement in academic performance over time, low overall proficiency rates, and low achievement outcomes. Academic performance for Bluff City has not consistently met authorizer expectations over the charter term. Bluff City has demonstrated some improvements in academic performance from multiple years of TVAAS Level 1 performance to TVAAS Levels 5 and 4 in the 2023-24 school year and the 2024-25 school year along with increased college and career readiness opportunities and improved Ready Graduate outcomes. However, proficiency rates remain substantially below the resident district, particularly in English language arts. Additionally, achievement gaps for students with disabilities remain a concern despite improvements in service delivery and support structures. Throughout the charter term, the school has not consistently demonstrated sustained evidence that improvements in academic performance translate into strong academic proficiency outcomes across student groups. Bluff City High School's academic performance over time does not show consistent, sustained improvement.

While site visit observations identified a positive learning environment characterized by orderly classrooms, strong student-teacher relationships, and clear behavioral expectations, classroom observations also revealed that many learning experiences lacked sufficient cognitive demand and opportunities for students to engage in rigorous, grade-level work. Students were frequently asked to complete procedural or compliance-oriented tasks rather than engage in higher-order thinking, academic discourse, and complex problem solving, and teachers were observed holding the cognitive load of the content being taught. The school has established collaborative structures that support special populations through co-planning, differentiated instruction, and coordinated intervention efforts. However, concerns remain regarding whether these instructional practices are consistently positioned to accelerate academic achievement and close persistent performance gaps.

The school's Operational Stability partially meets the standard. Concerns remain

regarding long-term staff retention and leadership stability. The school has experienced substantial principal turnover throughout the charter term, and with turnover of the principal, teacher turnover and vacancies persisted. With each new principal, many systems had to be recreated and established, which corresponds to dips in academic performance observed throughout the charter term. While recent retention efforts appear promising, the sustainability of these improvements has not yet been demonstrated. Ultimately, leadership instability and staffing challenges have directly impacted Bluff City's historical academic performance.

Additionally, enrollment trends are an area of concern. The school continues to operate below enrollment targets and has experienced notable student attrition during the charter term. Although leadership has implemented recruitment and retention strategies intended to address these challenges, the long-term effectiveness of those efforts has yet to be fully demonstrated. Through the Review Committee's site visit, there is evidence of positive stakeholder engagement, and effective governance oversight, and students, families, and staff interviewed at that site visit consistently described a safe, supportive, and welcoming school environment. The school has demonstrated success in fostering a culture of belonging, recently reducing chronic absenteeism, and maintaining strong family satisfaction.

The governing board provides oversight of academic, financial, and organizational performance, and leadership has taken significant steps to strengthen operational systems following network restructuring efforts. While the school has taken steps to strengthen organizational systems and cultivate a positive stakeholder experience, the long-term impact of these efforts has not yet been reflected in sustained academic outcomes or organizational stability across the charter term.

The school's Financial Health meets the standard due to its consistent demonstration of sound fiscal management and financial stability. Throughout the charter term, Bluff City has maintained positive fund balances, strong cash reserves, and clean audit results while navigating organizational transitions and enrollment fluctuations. Financial controls and oversight structures are well established, and the school has demonstrated the capacity to manage resources responsibly. Although the school demonstrates strong financial health, financial performance alone does not outweigh the aforementioned concerns identified throughout the charter term.

For these reasons, the Review Committee finds that, despite strengths in school culture, stakeholder engagement, and financial stewardship, Bluff City High School has not demonstrated the consistent and sustained academic performance necessary to warrant renewal for an additional ten-year charter term. Persistent concerns regarding academic proficiency, instructional rigor, subgroup performance, leadership stability, and staff retention

have remained evident throughout the charter term. While the school has established foundational conditions intended to support student success, those conditions have not resulted in the consistent and sustained academic outcomes necessary to support renewal for an additional ten-year charter term.

For additional information regarding the Review Committee's evaluation of the Bluff City renewal application, please see **Exhibit A** for the complete Charter Renewal Application Review Committee Report, and for additional information regarding the renewal site visit and subsequent findings, please see **Exhibit B** for the complete Renewal Site Visit Report. Both reports are fully incorporated herein by reference.

Public Hearing

Pursuant to Commission Policy 3.600, a public hearing chaired by the Executive Director will be held on November 16, 2026.

[SUMMARY OF PUBLIC HEARING PENDING]

Preliminary Analysis

Under T.C.A. § 49-13-121 and Commission Policy 3.600, the Commission is charged with determining if a charter school currently operating under the Commission will continue its authorization under the Commission for another ten-year charter term. In making my recommendation to the Commission, I will consider the Renewal Review Committee Report, the Renewal Site Visit Report, the cumulative performance of the school in relation to the Commission's Renewal Criteria, the discussion at the public hearing, and the public comments received by Commission staff.

The Renewal Review Committee Report and Renewal Site Visit Report provide a comprehensive review of Bluff City High School's performance throughout the current charter term. Based on my review of the record, I agree with the Review Committee's determination that the school has demonstrated mixed performance over time and has not established a consistent record of meeting the Commission's renewal standards.

Academically, Bluff City remains off track for renewal. **Exhibit C** outlines Bluff City's available academic performance in recent years in comparison to neighborhood schools and the resident district. In 2022, the school was identified as off track during its interim review year and placed on Level 3 intervention, Notice of Probationary Status, pursuant to Commission Policy 3.400. Following the interim review, the school worked closely with Commission staff to develop and implement a corrective action plan designed to address identified deficiencies. As a result of the school's progress on the corrective action plan, the Commission reduced the intervention level to a Level 2 Notice of Deficiency in January 2025. Despite the school's progress on the

corrective action plan, the cumulative performance report found that Bluff City remained off track for renewal due to its academic and organizational performance over the charter term. While the school demonstrated improvement some of the years after the interim review, current academic data projections indicate a decline in performance during the 2025-26 school year. As a result, Bluff City is unlikely to meet standard in 2025-26 on the Commission's School Performance Framework and is projected to remain off track for renewal. Given the school's overall performance over the charter term, including its lack of consistent academic success and off-track status for renewal, I cannot conclude that the school has demonstrated performance sufficient to warrant a new charter term.

During the Renewal Site Visit, school leadership discussed factors that contributed to inconsistent academic outcomes over time, including leadership turnover as the school has had at least five principals during its tenure of operation. Leadership noted that principal transitions often resulted in corresponding staff turnover and periods of adjustment as new school leaders established academic expectations and school culture. While leadership identified these challenges as contributing factors, the record raises questions regarding the extent to which the network effectively supported school leadership and mitigated the impact of turnover on academic outcomes. The record indicates that the periods of leadership instability coincided with fluctuations in student performance and staffing vacancies were present during periods of academic decline in certain content areas. As a member of a broader network, Bluff City has access to academic systems, instructional expectations, and operational supports that remain in place despite personnel changes. While the network has recently taken steps to strengthen succession planning, including the development of assistant principal leadership pathways, these efforts are relatively recent and the effectiveness has not yet been demonstrated through sustained results.

While the school has demonstrated improvements in several operational indicators over the charter term, including reductions in chronic absenteeism and improvements in school culture, concerns remain regarding whether these gains have translated into consistent academic outcomes. Bluff City significantly reduced chronic absenteeism in recent years, decreasing from approximately 60% in 2022 to a projected 26% during the 2026-27 school year. The reduction in absenteeism aligns with school efforts to strengthen family engagement and implement attendance-focused interventions. Additionally, recent site visit reports indicate that classrooms were orderly, behavior expectations were clear, and students understood school norms and routines. However, the renewal site visit also identified inconsistencies in instructional rigor and academic expectations across classrooms. While site visit observations and operational indicators suggest improvements in school culture, there remains limited evidence that the school has established and consistently implemented a clear vision for high-

quality instruction. The variation observed across classrooms raises concerns regarding the consistency of instructional delivery and the school's ability to produce sustained academic gains over time.

Operationally, Bluff City has demonstrated mixed results throughout the charter term and has not consistently met organizational performance standards on the Commission's School Performance Framework. Areas of concern have included chronic absenteeism, staff and leadership attrition, enrollment instability, and historical compliance challenges. While the school has addressed several of these issues, concerns remain regarding leadership stability, enrollment trends, and the sustainability of recent operational improvements. Enrollment remains a concern. Although school and network leadership have prioritized enrollment growth and stabilization in recent years, the school is under enrolled, serving approximately 421 students during the 2026-27 school year. Throughout the charter term, the IOTA Community Schools network has navigated significant organizational changes, including its separation from a national charter management organization, the establishment of a local governance structure, and the closure of two schools in its network. The network has responded to these challenges by strengthening compliance systems, particularly in the areas of special education and English learner services. Nevertheless, the school's operational history over the charter term has been inconsistent, and that record should be considered alongside the school's academic performance in the overall renewal determination.

Financially, I agree that the school is on track for renewal. While enrollment fluctuations have presented challenges throughout the charter term, the school and network have taken steps to strengthen their financial positions. These efforts include reducing facility-related debt obligations and increasing available cash reserves. The network's financial management is stable, and the record demonstrates improved financial performance relative to earlier years in the charter term.

Although the school currently demonstrates financial stability, enrollment remains an area for improvement, given its connection to the school's long-term financial outlook. The renewal application projects significant enrollment growth in future years and identifies that growth as a key component of the school's financial sustainability. However, current enrollment remains below capacity, and recent enrollment trends raise questions regarding the feasibility of achieving the projected increases. School leadership indicated that operations remain financially viable at approximately 400 students. While this suggests the school's financial position is not wholly dependent on achieving its projected enrollment, uncertainty remains regarding the assumptions underlying future enrollment growth.

Finally, while the renewal application outlines ambitious goals for improving student

outcomes in future years, the school's historical performance raises questions regarding the feasibility of achieving those goals. Bluff City has maintained strong college and career readiness outcomes and continued to expand career and technical education opportunities for students. These efforts provide meaningful benefits to the students the school serves and reflect a commitment to preparing students for postsecondary success. However, the Commission's renewal decision must be based on demonstrated performance over time. While the network has undertaken significant restructuring efforts and implemented strategies designed to improve academic and operational outcomes, many of these initiatives remain relatively recent and have not yet produced sustained evidence of success. Although there are indications of improvement in certain areas, the results are not yet sufficient to overcome the school's overall record of inconsistent academic performance throughout the charter term. For these reasons, I believe Bluff City has not demonstrated performance sufficient to warrant a new ten-year charter term.

CONCLUSION

For these reasons, and for the reasons stated in the Review Committee Report attached hereto as **Exhibit A** and the Renewal Site Visit Report attached hereto as **Exhibit B**, I preliminarily recommend that the performance of the school does not warrant a ten-year renewal term. This report will be updated and finalized after the completion of the public hearing on November 16, 2026.

Tess Stovall, Executive Director
Tennessee Public Charter School Commission

Date

TENNESSEE
PUBLIC CHARTER SCHOOL COMMISSION

EXHIBIT A:
Charter Renewal Application Review Committee Report

August 10, 2026

School Name: Bluff City High School

Operator: IOTA Community Schools

Location of School: Memphis, TN

Evaluation Team:

- Michelle Doane, External Consultant
- Rebecca Ledebuhr, Data and Accountability Coordinator
- Maggie Lund, Deputy Director of Authorizing

This recommendation report is based on a template from the National Association of Charter School Authorizers.

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Introduction

Pursuant to Tennessee Code Annotated ("T.C.A.") § 49-13-121, Tennessee Public Charter School Commission ("Commission") Policy 3.600,[1] and charter renewal guidance issued by the Commission and the State Board of Education, the authorizer shall provide a school with the opportunity to make a clear and compelling case for renewal. On December 1, 2025, the Commission provided Bluff City High School ("Bluff City") with a cumulative performance report and renewal criteria. On April 1, 2026, the governing board of Bluff City submitted a renewal application to the Commission for continued authorization and renewal of the charter agreement for a ten-year term.

Pursuant to Commission Policy 3.600, the Commission staff completed an application review process. The Commission assembled a charter application review committee comprised of highly qualified internal and external evaluators with relevant and diverse expertise to evaluate the application. The Commission provided training to all review committee members to ensure consistent standards and fair treatment of the application. The Commission's Charter Renewal Application Review Committee utilized the Commission's Charter Renewal Application Rubric, which is used by the Commission when evaluating an application for renewal. In alignment with the State Board of Education's Quality Authorizing Standards in Policy 6.111, the authorizer "[b]ases 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" and "[g]rants 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." In addition, the Commission may hold a public hearing in the district where the charter school is located and conduct a renewal site visit in the school's tenth year of its charter agreement.

Overview of the Evaluation Process

The Commission's charter application Review Committee developed this recommendation report based on three key stages of review:

1. **Evaluation of the Proposal:** The Review Committee independently reviewed the charter renewal application, attachments, and budget submitted by the school. After an independent review, the Review Committee collectively identified the main strengths, concerns, and weaknesses as well as developed specific questions for the applicant in the four sections of the application: Academic Success, Operational Stability, Financial Health,

[1] All Commission rules and policies may be found on the Commission's website.

and Future Plans and Projections.

2. **Capacity Interview:** Based on the independent and collective review of the application, the Review Committee may conduct an interview with the members of the governing board and school leadership to address the concerns, weaknesses, and questions identified in the application, and to assess the capacity to execute the application's overall plan. This may be held if the Review Committee determines it is needed outside of the renewal site visit in the fall.

This recommendation report includes the following information:

1. **Summary of the application:** A brief description of the applicant's academic, operations, finances, and future planning.
2. **Summary of the report:** A brief summary of the overall strengths and weaknesses of the application.
3. **Analysis of each section of the application:** An analysis of the four sections of the application and the capacity of the team to execute the plan as described in the application.
    a. **Academic Success:** school's academic achievement and growth results over the course of the charter term including graduation rates, progress toward meeting the academic goals outlined in the charter agreement, the current assessment system and how assessments are used to inform practice, how the school uses data to inform effectiveness of academic program, progress made toward closing achievement gaps including students with disabilities and English learners, leader and teacher professional development, supports for students with disabilities and English learners, areas of academic concern and changes made to address deficiencies, and why the school's outcomes merit renewal.
    b. **Operational Stability:** progress toward meeting the operational goals within the authorizer's performance framework, student enrollment trends, trends in student attrition rates, how the school provides a safe environment, community connections and relationships with families and parents, personnel stability and effective teacher retention, development of governing body members and school leadership, any anticipated facility changes, and why the school's operational condition merits renewal of the charter agreement.
    c. **Financial Health:** progress toward meeting the financial goals outlined in the authorizer's performance framework, report on fiscal management of the school, address alignment between expenditures and the school's mission and academic

plans, review any significant fiscal challenges and how they were addressed, describe efforts to operate the school in a financially sound manner, and why the school's financial condition merits renewal of the charter agreement.

d. **Future Plans and Projections:** academic plan and goals for the new charter term, organizational changes the school anticipates in the new charter term, if school is requesting an expansion of grades served, and how school will remain financially sustainable in the new charter term.

The evaluators used the following criteria and guidance from the scoring rubric to rate the applications:

Characteristics	
Meets or Exceeds Standard	The record includes specific and accurate evidence that the school generally demonstrated success in meeting and upholding the terms of the charter agreement.
Partially Meets Standard	The record mostly meets the criteria in some respects but lacks sufficient evidence that the charter school is meeting the terms of the charter agreement in one or more areas.
Does Not Meet Standard	The record provides evidence that the charter school committed a violation of its charter agreement, failed to meet or make sufficient academic progress, and/or failed to meet generally accepted standards of fiscal management.

TENNESSEE
PUBLIC CHARTER SCHOOL COMMISSION

Summary of the Application

School Name: Bluff City High School

Operator: IOTA Community Schools

Location of School: Memphis, TN

Mission: The mission of Bluff City High School is to help transform public education so that all students graduate prepared for college, leadership, and life.

Number of Schools Currently in Operation by Governing Board: 2

Current Enrollment:

Current Grade Levels and Student Enrollment		
Year of Current Charter	**Grade Levels**	**Total Student Enrollment**
SY25-26	9-12	440
SY24-25	9-12	514
SY23-24	9-12	478
SY22-23	9-12	494
SY21-22	9-12	500

Proposed Enrollment:

Proposed Grade Levels and Student Enrollment for Next Ten-Year Term		
Year Following Renewal	**Grade Levels**	**Total Student Enrollment**
SY27-28	9-12	525
SY28-29	9-12	536
SY29-30	9-12	546
SY30-31	9-12	557
SY31-32	9-12	565
SY32-33	9-12	574
SY33-34	9-12	580
SY34-35	9-12	586
SY35-36	9-12	591
SY36-37	9-12	597

Brief Description of the Application:

Bluff City is a charter school in Shelby County, Tennessee and serves students in the southeast region of Memphis. Bluff City is a high school serving grades nine through twelve. The school intends to continue operating in this neighborhood. Bluff City's educational model will

prepare students for college, leadership, and life by providing a small, college-preparatory program where all stakeholders actively engage in the education process. The educational program is designed to give students the content knowledge and cognitive skills in order to be successful in college and beyond.

The school's governing board is IOTA Community Schools. Bluff City intends to stay in its current facility for its next ten-year charter term as the facility is an integral part of the community. Bluff City is currently operating in a fiscally solvent position and projects ongoing financial sustainability following recent network rightsizing

Summary of the Evaluation

The Review Committee identified the following strengths and weaknesses within the application. The Review Committee scored each section of the application individually according to the rubric.

Bluff City High School partially meets standard for academic success. While there are areas of the school's academic model and outcomes that have demonstrated some improvement, the school's academic data continues to not meet the standard for renewal. The school's data has demonstrated recent academic growth, particularly its improvement in TVAAS performance from multiple years at Level 1 to Level 5 in 2023-24 and Level 4 in 2024-25. There was also growth among student subgroups, including English learners and narrowing achievement gaps for some populations. Additionally, the school has strengthened its college and career readiness programming through expanded Career and Technical Education ("CTE") pathways, improved Ready Graduate and College and Career Readiness ("CCR") rates, and enhanced postsecondary opportunities. However, Bluff City's academic data demonstrates consistently low proficiency levels, especially in English language arts ("ELA"), and persistent achievement gaps for students with disabilities. The school's academic performance has been inconsistent over the charter term, raising questions about whether the ambitious proficiency goals proposed and plans to address deficiencies for the next charter term are attainable.

Bluff City High School partially meets standard for operational stability. While the school has shown some improvements in school culture, and community partnerships, the school's organizational performance over the charter term does not meet the standard for renewal. The school has made progress in improving school culture, citing reductions in suspension rates and chronic absenteeism, increases in average daily attendance, and increases in family satisfaction. The network and board successfully navigated the transition to a local IOTA Community Schools board from a national charter management organization ("CMO") and have addressed prior concerns through corrective action plans. The application outlines leadership succession planning efforts and valuable community partnerships that provide wraparound services and

career-focused opportunities for students. However, concerns remain regarding teacher and principal retention, as the school has historically struggled with staff turnover and persistent vacancies that have impacted academic outcomes. Enrollment stability also remains a challenge due to significant student attrition during the charter term and future enrollment projections that exceed historical enrollment levels.

Bluff City High School meets standard for financial health. IOTA Community Schools has demonstrated sustainable financial management practices throughout the charter term, including maintaining clean audits, operating transparently, and remaining financially stable through significant organizational changes. The school successfully transitioned from a national charter management organization to a locally governed network and navigated the closure of two schools within the portfolio without negatively impacting ongoing operations and fiscal solvency. The committee also recognized the school's efforts to address prior financial challenges by reducing facility debt, improving financial performance measures, strengthening cash reserves, and aligning expenditures to academic priorities and the school's mission.

Bluff City High School meets standard for future planning. The application outlines plans to address areas of deficiency and need. The school included measurable goals related to academics, subgroup performance, school culture, and college and career readiness, all grounded in lessons learned during the current charter term. Bluff City plans to expand career and technical education opportunities, including pathways in culinary arts, cybersecurity, and supply chain management, aligning with workforce demands and the postsecondary preparation goals outlined in the renewal application. Leadership also outlined network and school succession plans and organizational restructuring efforts designed to strengthen long-term sustainability. The review committee will evaluate early execution benchmarks for Year 1 enrollment targets during the fall site visit.

Analysis of Academic Success

Rating: Partially Meets Standard

Strengths Identified by the Committee

Bluff City High School's academic success partially meets standard because while the school achieved recent growth gains (TVAAS Levels 4 and 5) and expanded postsecondary offerings in line with its mission, cumulative academic performance remains mixed over time and overall proficiency rates remain low. The school does not meet the Commission's academic renewal criteria.

The Bluff City application and cumulative performance report detail the school's recent upward trajectory in student growth outcomes. Bluff City demonstrated TVAAS improvement in recent years, with the school moving from multiple years of Level 1, less than expected growth, to Level 5, more than expected growth, for the 2023-24 school year. In the 2024–25 school year, the school scored a Level 4 rating, more than expected growth under the state accountability framework. Bluff City students have also demonstrated growth across multiple student subgroups. English learner ("EL") students have shown growth in math proficiency in recent years, and Bluff City testing data demonstrates that achievement gaps for economically disadvantaged students and some English learner populations are narrowing.

Bluff City utilizes internal assessment data to drive instructional decisions and teacher support. The application outlined a comprehensive internal assessment framework that is currently used to inform instructional coaching, professional development, RTI supports, and teacher evaluation. The school uses this data to inform instructional decisions and to ensure students are grasping all academic material. The application outlines a clear demonstration of understanding of past and current academic challenges, and the school provided root cause analyses for past performance issues. The application also spoke to specific plans to address identified academic deficiencies.

Throughout the tenure of the school, Bluff City has built its focus on college and career readiness. The school has expanded CTE pathways and career-focused opportunities, increased its Ready Graduate rate substantially from 8.9% in 2021 to an estimated 69.8% in 2025, increased its CCR rate by over fifty percentage points to 61% in 2025, and developed robust postsecondary programming. This academic program is increasingly aligned to the needs of the student population that Bluff City serves, particularly through expanded career pathways and interventions designed to meet students where they are academically. Within the application, Bluff City outlined its development of CTE pathways and wraparound services as critical to its mission in serving students holistically and preparing them for college, leadership, and life.

Weaknesses Identified by the Committee

Despite recent growth, overall proficiency at Bluff City remains low with 8.8% of students proficient in math and 15.5% proficient in reading for school year 2024-25. This is lower than the resident district's proficiency rates at 34.4% in ELA and 23.4% in math. ELA proficiency improved initially in 2022, but more recent proficiency data from the 2024-25 school year and the 2023-24 school year demonstrate proficiency declines. Bluff City's proficiency rate in ELA for the 2024-25 school year was 15.5%, which is a decline from the 2023-24 school year's ELA proficiency rate of 19.9%. While growth metrics have improved, the school has not consistently translated that growth into higher proficiency outcomes, with overall proficiency rates remaining well below resident district averages across nearly all student subgroups.

The performance of students with disabilities also remains an area of concern. The cumulative performance report demonstrates consistent achievement gaps between students with disabilities and their peers, inconsistent academic outcomes for this subgroup, and persistent gaps in special education service delivery during the tenure of the charter term. While compliance for service of this subgroup has improved in recent years, the achievement gap for students with disabilities and their peers remains.

Ultimately, Bluff City remains off track for renewal on the Commission's Renewal Criteria for mixed academic performance throughout the charter term. Proficiency, growth, and graduation trends were inconsistent throughout the years of operation of the school, resulting in multiple issuances of intervention by the Commission. Following the school's high-stakes interim review, the school was placed on Level 3 Probationary Status in the 2022-23 school year and remained on Level 2 Notice of Deficiency intervention throughout the 2025-26 school year for academic underperformance. While there is evidence of growth momentum in the 2023-24 school year and the 2024-25 school year, the application lacks evidence of an operationalized plan to ensure its ambitious proficiency growth targets can be achieved within a new contract term. During the upcoming fall site visit, the review committee will assess the school's progress in implementing the changes outlined within the application to address low proficiency, ELA instruction, and service of subgroups of students.

Analysis of Operational Stability

Rating: Partially Meets Standard

Strengths Identified by the Committee

Bluff City High School's operational stability partially meets standard because, while the school has made measurable improvements during the tenure of its operation, concerns remain with operational items such as teacher retention, meeting enrollment targets, and long-term organizational stability.

Bluff City has made improvements during the tenure of its operation to its school culture system, including additional wraparound services for students and positive incentives. Suspension rates have improved, the application notes that school culture is positive and joyful for students, and family satisfaction has improved, going from 57.1% in the 2021-22 school year to 91.4% in the 2024-25 school year according to survey data. Chronic absenteeism has also decreased, going from 55.8% in the 2024-25 school year to an estimated 26.7% in the 2025-26 school year. The school has also increased the average daily attendance rate and has attributed these gains to intentional attendance interventions, relationship-based case management systems, restorative practices, and increased family engagement efforts.

Following the transition from Green Dot Public Schools to a local network model, the IOTA Community Schools governing board has maintained active oversight, fulfilling key statutory requirements, managing network rightsizing, and ensuring continuity of operations. The governing board is composed of eight individuals with diverse expertise, including two parents. While the school has been issued interventions during the charter term for organizational concerns, the school systematically addressed prior deficiencies, resolved outstanding corrective actions, and provided transparent explanations.

The current network leadership structure as outlined within the application has been adjusted recently to ensure more efficiency. With the recent closure of two schools within the portfolio, the network restructured network leadership support to align with a two-school portfolio by eliminating redundant positions, streamlining operations, and ensuring the network is sustainable going forward. Additionally, the school is working on succession planning for leadership at both the network- and school-level, ensuring stability of leadership going forward. There is now an assistant principal being trained at Bluff City should there be a principal departure to ensure someone is ready to step in as needed to continue the mission-aligned work.

Finally, an operational strength of Bluff City is the community partnerships they have including LifeDoc Health, University of Memphis, Code Crew, and Greater Memphis Chamber.

These partnerships help the school offer the necessary wraparound supports for the student population they serve and ensure a variety of CTE options for students.

Weaknesses Identified by the Committee

Bluff City's teacher retention has consistently been low, 55% in 2023-24 and 64% in 2024-25. Historically, Bluff City has struggled with teacher vacancies and with high staff turnover, particularly during years of principal turnover. Principal tenure has also been unstable at Bluff City with three different principals serving in the last six years of the charter term. As seen in Bluff City's performance over the charter term, teacher vacancies impact proficiency and growth data for the subject areas affected. Given the recent closure of two schools within the network, Bluff City has received some experienced teachers from other IOTA schools. The network is also implementing financial and retention incentives for teachers to attempt to improve teacher retention in future years. While the school is continuing to implement strategies to address teacher retention and vacancies, it remains a persistent challenge.

Enrollment stability has also been an area of weakness for the school as Bluff City experienced enrollment declines during portions of the charter term and has had fluctuating attrition rates. In the 2022-23 school year, about 30% of students who could have remained at Bluff City chose to leave, then 45% in the 2023-24 school year, and 36% in the 2024-25 school year. During the capacity interview, school leaders provided explanations for this attrition and outlined recruitment strategies to ensure stable enrollment going forward. However, the outcomes of these strategies are yet to be seen. Consistent and stable enrollment is critical to the organizational and financial success of Bluff City, and the review committee found no evidence to support the school's request for an increased enrollment cap.

Finally, the school is designated as off-track for organizational performance in alignment with the Commission's Renewal Criteria for varied performance during the charter term. The network and school leadership team provided detailed strategies to improve teacher and student retention, enrollment, and to adjust network capacity during the capacity interview and within the application; however, these efforts at this time remain unproven. The Review Committee and Commission staff will follow up on these initiatives and progress during the fall site visit to determine whether these initiatives yield measurable operational improvements.

Analysis of Financial Health

Rating: Meets Standard

Strengths Identified by the Committee

Bluff City High School's financial health meets standard because the network and school have met financial framework benchmarks for majority of the charter term, and the school has successfully navigated major changes to its network structure to preserve long-term fiscal sustainability.

Bluff City leadership and the IOTA Community Schools network have maintained a positive fund balance during the tenure of the charter agreement. The school has maintained clean audits throughout the charter term and demonstrated compliant fiscal management practices, meeting standard in these areas of the financial framework. The organization has operated transparently and has maintained financial solvency despite the restructuring from a national CMO to a local board. Additionally, the school successfully navigated the closure of two schools within the portfolio of schools without financially impacting the schools that continued operation within the portfolio.

While low academic performance and enrollment volatility previously created fiscal pressures, including debt covenant compliance issues, the school has since stabilized its financial position. By reducing facility debt and improving expenditure controls, the school has strengthened its cash reserves and restored alignment with financial framework standards. Bluff City has strong cash reserves with 164 days cash on hand, which exceeds the 60-day benchmark in the Commission's school performance framework, has decreased its debt obligations over the charter term, and provided evidence of expenditures linking academic priorities and the school's mission. Enrollment projections within the application increase substantially in future years from where the school currently operates, which the school asserts would ensure future financial stability if realized. Network leadership clarified during the capacity interview that the school's break-even threshold is 400 students, a level below both current enrollment (440) and projected school year 2027-28 targets (525), confirming that the school can maintain operational solvency even if projected enrollment expansion is not fully realized.

Analysis of Future Plans and Projections

Rating: Meets Standard

Strengths Identified by the Committee

Bluff City High School's future planning meets standard because the school outlines strategies to address identified areas of need, provides academic goals to be met by end of term and how students will be supported in attaining them. The school also aims to expand on student opportunities and CTE pathways, and the school plans to continue to improve network efficiency and succession planning.

Bluff City's future plans as outlined are aligned to identified areas of deficiency and need throughout the application. The school outlines specific targets and plans that build on the recent academic success with TVAAS and student subgroup growth, aiming to address low proficiency in ELA and math. The application includes measurable academic benchmarks, subgroup goals, culture targets, and college and career readiness objectives. The outlined strategies to address deficiencies are grounded in lessons learned from the current charter term and supported by established monitoring systems that are designed to directly address these deficiencies. While the outlined goals are rigorous, the school will need to provide evidence at the upcoming site visit that these goals can be met given the school's historic academic outcomes.

The application also details the expansion of career pathways and student opportunities, something that the school has continued to build upon throughout the charter term and aims to continue to do so if granted a new charter term. Bluff City plans to further invest in culinary arts, cybersecurity, supply chain, and other high-demand pathways that are aligned to student needs, and the CTE plans are structured in a way to strengthen student engagement and postsecondary readiness. This demonstrates alignment in furthering the mission of the school for preparing students for college, leadership, and life.

During the capacity interview, Bluff City leadership spoke to succession planning efforts and organizational restructuring designed to strengthen leadership and teacher sustainability for both the school and network. As happened in multiple instances over the charter term, the departure of a principal led to instability of instruction and high teacher attrition. The network addresses this by the addition of assistant principal roles that can step into the principal role if needed, leadership development initiatives, more defined responsibilities for academic support, and systems intended to preserve institutional knowledge.

To support these academic and operational goals, the application outlines strategies to build and sustain student enrollment from its current level of 440 students to 525 students in

the 2027-28 school year (projected to reach 597 by Year 10). The school has engaged external marketing support and outlined targeted outreach initiatives to execute this plan. The review committee will monitor early execution indicators and recruitment benchmarks for these year 1 targets during the upcoming fall site visit.

Evaluation Team

Michelle Doane has decades of experience in the education field. She is the owner and principal consultant of Doane Consulting LLC, which provides education consulting services across the country. Michelle specializes in areas including, but not limited to project management; strategic planning; program development and evaluation; charter school development; charter school authorization and evaluation; and school and authorizer quality. Previously, Michelle worked at the Tennessee Charter School Center for several years, where she managed leadership fellowships through which she successfully recruited and supported experienced school leaders in designing, applying for, and opening new-start and turnaround charter schools in Nashville and Memphis. Additionally, in this role, she focused on continuous improvement initiatives aimed at supporting and improving the quality of charter schools across the state. Michelle has also held roles at Vanderbilt University and the Nashville Symphony. She holds a B.M. from the Eastman School of Music, a M.M. from the University of Michigan, and a M.Ed. from Vanderbilt University.

Rebecca Ledebuhr is the Data and Accountability Coordinator at the Tennessee Public Charter School Commission. Before taking on her role at the Charter Commission, Rebecca spent fourteen years working in public schools in North Carolina and Tennessee. Most recently, she served as an instructional coach for mathematics at a Nashville public charter school. Rebecca has served on the Nashville Public Education Foundation's and Mayor's Teacher Cabinet, as a mentor teacher for the Nashville Teacher Residency, and as a Tennessee Educator Fellow for the State Collaborative on Reforming Education ("SCORE"). Rebecca holds a B.A. in Philosophy and Religion from James Madison University.

Maggie Lund is the Deputy Director of Authorizing at the Tennessee Public Charter School Commission. Additionally, she serves as an adjunct professor in the Lipscomb College of Education Master's Program, teaching Planning, Instruction, and Assessment and Building Classroom Communities. Prior to her role at the Charter Commission, Maggie served as a school administrator at a Nashville public charter school. Maggie was a Teach for America corps member and served as an 8th grade teacher in a Nashville charter school for four years. Maggie holds a B.A. in Business Administration and Marketing from Loyola University New Orleans, a Doctor of Education degree, and a Master of Education degree with a specialization in English Language Learning from Lipscomb University. Her dissertation research focused on Restorative Justice Practices and school culture. Most recently, her research article, Mindsets Matter for Equitable Discipline was published in the Middle School Journal.

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EXHIBIT B:

Annual and Renewal Site Visit Report

Bluff City High School

September 15, 2026

PURPOSE AND PROCESS

Pursuant to Tennessee Code Annotated ("T.C.A.") § 49-13-121, Commission Policy 3.600[1], and charter renewal guidance issued by the Tennessee Public Charter School Commission ("Commission") and the State Board of Education, the authorizer shall provide a school with the opportunity to make a clear and compelling case for renewal, and a component of this renewal process includes an in-person visit to the school. Additionally, pursuant to Commission Policy 3.300 – Oversight and Evaluation, the Commission conducted its annual site visit of Bluff City High School ("Bluff City"), on September 15, 2026. The Review Committee's visit was a full day, as determined by the site visit and renewal protocols. The purpose of the renewal site visit is to collect quantitative and qualitative evidence to evaluate the school's success both for monitoring purposes and supplement each authorized charter school's annual evaluation on the Commission's School Performance Framework, Commission Policy 3.700, and the Commission's Renewal Criteria[2]. The following people attended the renewal site visit:

- John Bowyer, English Learner Program Coordinator
- Michelle Doane, External Consultant
- Rebecca Ledebuhr, Data and Accountability Coordinator
- Maggie Lund, Deputy Director of Authorizing

During the visit, the Commission team had the opportunity to observe classroom instruction and analyze academic and school culture data. The Commission team met with the Executive Director, staff, principal, assistant principals, teachers, students, parents, a governing board member, the coordinated school health representative, the director of operations, the special populations coordinator, an English learner teacher, and a special education teacher. The focus of the site visit measures the school's progress toward its mission, performance in alignment with the Commission's school performance framework and renewal criteria, overall

[1] All Commission rules and policies may be found on the Commission's website.

[2] Outlined in Commission Policy 3.600

student performance and program delivery, access and equity, culture and family engagement, operational performance, compliance and capacity, and governance. This Site Visit Report does not include a comprehensive list of all observations and learnings from the visit. Rather it highlights trends including overall strengths and areas for improvement that were deemed relevant for consideration when making final determinations regarding the school's renewal decision and performance in the annual report.

As part of the renewal process, Commission staff provided the school with the Renewal Protocol outlining all components of the renewal process, including the site visit. Prior to the visit, the Commission provided Bluff City with the Site Visit Protocol, outlining all evidence to be gathered during the visit and its alignment with the Commission's Charter School Performance Framework. This Site Visit Report is intended to provide additional information outside of the Review Committee's evaluation of the submitted renewal application and address outstanding questions of the Review Committee. It is not an official evaluation of the school, rather it adds to the totality of the evidence regarding the school's performance both for this school year and its tenure.

EXECUTIVE SUMMARY

Bluff City began operations in the 2017-18 school year and is authorized to serve grades 9-12, which were the grades served during the 2026-27 school year. The school is currently undergoing the renewal process with the Commission. Bluff City's budgeted enrollment from its June 1, 2026 board-approved budget is 500 students, and enrollment at the time of the site visit was 423.

Commission staff held an extended data meeting with the school and network leadership as part of the renewal site visit. The school's off-track status for renewal in alignment with the Commission's renewal criteria was discussed extensively. This status is due primarily to cumulative academic performance and organizational performance over the term of the charter. Preliminary data from the 2025-26 school year was discussed, and the data does not demonstrate sustained improvements from the previous school year. The network leadership reiterated during the discussion the relationship between leadership turnover and academic outcomes. Throughout the term of Bluff City's agreement, declines in academic proficiency and growth are seen when leadership (principal) has turned over, resulting in subsequent teacher turnover and necessitating a reset of academic expectations. Ultimately, mixed academic performance over time and a lack of a clear academic vision and systems that transcend any one leader have led to an off-track status for renewal.

Based on the Review Committee's site visit and the information that was collected during the visit, below are the areas of strength and areas for growth that were identified as a part of

this process. During the site visit, the Review Committee also addressed concerns outlined within the Review Committee Report with school leadership. Those questions, concerns, and outcomes are outlined below as well.

Areas of Growth	
Aligned Evaluation Metric	**Commission Team Findings**
Program Delivery	While classrooms observed were calm and compliant, there was an observed lack of rigor. Students had little academic ownership with teachers doing most of the cognitive lift as evidenced by teachers doing most of the talking while students listened in many instances. Many of the questions asked of students during class were basic in nature and focused on the activity as opposed to the academic content. In many classrooms observed, students appeared to be completing academic tasks, but the material lacked rigor or opportunity for student analysis, problem solving, or discussion. For example, students were tasked to copy information from the board, or teachers asked process-oriented questions instead of questions geared at gauging understanding of content. During the data meeting, leadership stated that teachers should be providing feedback on student work; however, there were limited classrooms observed where teachers were moving around the room, providing meaningful feedback on student work. This finding has a direct correlation with the academic results of the school.

Areas of Strength	
Aligned Evaluation Metric	**Commission Team Findings**
School Progress Toward Mission	Bluff City's mission is to help transform public education so that all students graduate prepared for college, leadership, and life. Bluff City demonstrates its commitment to this mission through the course offerings and wrap-round services offered to students. Within the last few years, Bluff City has expanded their career and technical education ("CTE") programming. Commission staff were able to observe a career exploration class and an advanced placement ("AP") access class. Many teachers were also observed discussing ACT and postsecondary preparation during classes.
Program Delivery	Within the observed classrooms, students overall were engaged in lessons and were interacting with provided instructional materials. Commission staff observed school-wide staff including teachers, security officers, and leadership upholding school-wide systems. During classroom observations, students demonstrated awareness of behavior and participation expectations.
Access and Equity	Classrooms with co-teaching, direct services, and the functional skills classroom were all observed during the site visit. Evidence of co-planning for lessons between general education teachers and SPED/EL teaching was observed. Students were observed participating in lessons. During interviews with SPED/EL staff, teachers stated they have adequate common planning time with general education teachers, and they differentiate instruction for students requiring co-teaching services during lessons.

Areas of Strength	
Aligned Evaluation Metric	**Commission Team Findings**
Culture and Family Engagement	In teacher interviews, teachers spoke to the positive and collaborative adult culture where teachers step in to help and provide resources when needed. In student interviews, students cited the family-like environment of Bluff City and stated they felt safe at school and had an adult in the building they could trust. Parents echoed the sentiments mentioned within the student interviews. Parents appreciate the small environment and security offered by the school.
School Environment	The school leadership team has established a consistent school culture. School culture is tracked through a positive behavior intervention system, and behavior data is analyzed by both teachers and leaders. The hallways and classrooms were calm, and students overall were compliant in the classrooms observed.
Governance	The school's governing board provides oversight and strategy for the organization. The board supports the executive director and receives progress reports on academic, financial, and organizational data at each board meeting, in addition to other communication as needed. The board has not operated with the committee structures they would have liked, though they indicated that they began working to reinstitute them during a recent board retreat. The board cited that the annual review of the executive director is conducted by a third party for honesty and transparency. Once they have results from the annual evaluations, they discuss them with the executive director.
Capacity and Compliance	The school is fully staffed except for one special education position, though at the time of the visit the leadership reported it had hired someone as a replacement who would start in the coming weeks.

Areas of Strength	
Aligned Evaluation Metric	**Commission Team Findings**
School Safety	The school has security officers in each hallway that do security checks in between classes including checking for locked interior and exterior doors. The building is safe and well-maintained.

Addressing Areas of Concern or Questions Outlined in Review Committee Report	
Concern or Question	**Review Committee's Evaluation of Response**
Progress in implementing the changes outlined in the application to address low proficiency, particularly in ELA.	The leadership made targeted staffing decisions to strengthen English language arts ("ELA") instruction for 2026-27 school year in response to the decline in student outcomes from the previous school year. The main focus with ELA is making learning transferrable to other subjects such as social studies. Across all contents, teachers are focused on how to approach a provided text regardless of subject. All teachers also have weekly professional learning community ("PLC") meetings focused on response to student data to help accelerate proficiency across subjects. The leadership also provides live coaching and rapid feedback for teachers as well as assistance in reteaching plans for remediation and reassessment of material. While Commission staff observed general engagement in ELA classrooms, academic rigor was not consistently observed. There was also no consistent evidence observed during classroom visits that learning was being transferred across subjects.
Progress in implementing the changes outlined in the application for service of subgroups of students.	While the school was not fully staffed for service of special populations, the school had a candidate in the pipeline to start in the coming weeks. The school has worked to schedule special populations of students first to ensure they adequately receive services prior to other students to ensure compliance with service requirements. Additionally, the school has scheduled common planning time for the special populations team and ELA teachers in addition to after school PLC time. This ideally will help to better target EL students and students with disabilities and collaborate and respond to performance data during co-teaching and push-in services.

Addressing Areas of Concern or Questions Outlined in Review Committee Report	
Concern or Question	**Review Committee's Evaluation of Response**
Progress and success of strategies implemented to improve teacher retention.	School leadership retained all but two staff members year over year exhibiting strong teacher retention. Leadership is working to build clearer expectations for teachers and now provide tiered coaching for teachers based on experience and performance to help maintain strong teacher retention in future years. Feedback is provided weekly on lesson plans. All teachers interviewed cited that Bluff City was a positive and collaborative work environment and that they appreciated the support provided by their coaches and other teachers. When sharing observations surrounding rigor lacking in classrooms, leadership stated that they want to do more to focus on explicit instruction and rigorous tasks in classrooms.
Progress and success of strategies implemented to improve student retention	A portion of the increased student retention is family engagement. The school has had strong family engagement this year with sixty families attending parent teacher conferences. Additionally, the school leadership and teachers are focused on providing increased opportunities for student connection and belonging. All students interviewed during the visit cited feeling a sense of belonging at school, and hallways and classrooms observed were calm and safe.
Progress and success of strategies implemented to improve enrollment	The school is not fully enrolled as compared to the 500 student budgeted enrollment. Bluff City is working closely with Wooddale Middle School to increase matriculation. The staff is also attending more community events for recruitment.
Adjustments to network capacity	The network has made staffing adjustments to right-size after the closure of two schools within the portfolio. School leadership states they generally feel supported by the network and the new structure.

Performance Framework and Annual Report

The annual site visit is one piece of the larger evaluation of a school authorized by the Commission. In accordance with Commission Policy 3.300 – Oversight and Evaluation, the Commission publishes its annual report at the end of the fall semester of each school year. Included in that report will be an evaluation of Bluff City based on the Commission's Charter School Performance Framework. It will contain quantitative school accountability data as well as qualitative evidence gathered during the annual site visit. The Commission team will share an abbreviated version of the annual report with school leaders during the summer, serving as a first look at how the school is fairing on its evaluation thus far. A complete evaluation will be included in the annual report and will be publicly available via the Commission's website by January 1, 2028.

Renewal Process

Pursuant to T.C.A. § 49-13-121, Commission Policy 3.600, and charter renewal guidance issued by the Commission and Department of Education, the authorizer shall provide a school with the opportunity to make a clear and compelling case for renewal. The renewal application shall require a charter school to present evidence supporting its case for charter renewal that is aligned with the Commission's renewal criteria and the charter school's performance standards in its charter agreement, as well as any additional evidence and improvements undertaken during the charter term. The renewal process also includes a site visit and a subsequent site visit report that addresses deficiencies noted within the Review Committee Report as well as an overall evaluation of performance for the school. Applicants also will participate in a public hearing and receive an Executive Director's recommendation regarding the renewal decision. Based on the totality of the evidence presented, Commissioners will render a decision regarding renewal for the applicant at the January 2027 meeting.

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EXHIBIT C:

Bluff City High School Comparative Academic Data

Comparative Schools and Context

The following schools are within five miles of Bluff City High School, serve grades nine through twelve and will be used to compare against Bluff City High School.

- Kirby High School – Memphis-Shelby County Schools ("MSCS") zoned school
- Memphis School of Excellence – MSCS charter school, grades nine through twelve used in comparisons
- Power Center Academy High School – MSCS charter school
- Southwind High School – MSCS zoned school
- Wooddale High School – MSCS zoned school

State Letter Grade Comparison[1]

	SY22-23 Letter Grade	SY23-24 Letter Grade	SY24-25 Letter Grade
Bluff City HS	**F**	**C**	**C**
Kirby HS	F	D	D
Memphis School of Excellence	C	C	C
Power Center Academy HS	C	C	B
Southwind HS	D	B	C
Wooddale HS	F	F	D

TVAAS Composite[2]

	SY22-23 TVAAS	SY23-24 TVAAS	SY24-25 TVAAS
Bluff City HS	**1**	**5**	**4**
Kirby HS	1	2	3
Memphis School of Excellence	5	4	3
Power Center Academy HS	3	5	5
Southwind HS	1	5	2
Wooddale HS	1	1	1

[1] Source – State Report Card Website, Data Downloads

[2] Includes all four subjects: ELA, math, social studies and science

TVAAS Growth of the Lowest 25% of Students

	SY22-23 TVAAS G25	SY23-24 TVAAS G25	SY24-25 TVAAS G25
Bluff City HS	**3**	**4**	**5**
Kirby HS	3	5	5
Memphis School of Excellence	5	5	2
Power Center Academy HS	2	3	5
Southwind HS	4	5	5
Wooddale HS	3	2	3

Graduation and College and Career Readiness ("CCR")[3]

	2024 CCR Rate	2025 CCR Rate	2025 Graduation Rate
Bluff City HS	**66.7%**	**61%**	**75.7%**
Kirby HS	51.0%	75.6%	84.2%
Memphis School of Excellence	47.1%	56.9%	98.6%
Power Center Academy HS	42.7%	92.6%	96.5%
Southwind HS	85.0%	88.8%	92.9%
Wooddale HS	41.5%	60.8%	73.1%

Chronically Out of School ("COS") Rate

	SY23-24 COS Rate	SY24-25 COS Rate
Bluff City HS	**56.0%**	**55.8%**
Kirby HS	41.0%	63.1%
Memphis School of Excellence	19.1%	21.2%
Power Center Academy HS	25.3%	13.3%
Southwind HS	23.7%	24.1%
Wooddale HS	56.7%	73.1%

[3] Graduation rates listed are state graduation rates.

ELA Success Rates and Estimates[4]

	SY22-23	SY23-24	SY24-25	SY25-26 Est.
Bluff City HS	**14.4%**	**20.1%**	**15.5%**	**12.3%**
Kirby HS	24.6%	16.1%	16.1%	21.9%
Memphis School of Excellence	29.7%	29.7%	23.5%	24.5%
Power Center Academy HS	23.9%	28.1%	28.8%	31.7%
Southwind HS	24.6%	24.8%	22.3%	33.1%
Wooddale HS	10.6%	10.3%	18.4%	15.8%
MSCS (9-12)	27.0%	27.9%	27.3%	29.3%

Math Success Rates and Estimates

	SY22-23	SY23-24	SY24-25	SY25-26 Est.
Bluff City HS	**<5%**	**8.0%**	**8.8%**	**10.3%**
Kirby HS	<5%	<5%	6.2%	18.6%
Memphis School of Excellence	7.0%	14.6%	10.7%	13.5%
Power Center Academy HS	10.9%	13.9%	21.6%	16.9%
Southwind HS	<5%	16.1%	14.0%	22.5%
Wooddale HS	<5%	<5%	<5%	6.9%
MSCS (9-12)	10.3%	14.8%	17.4%	21.8%

[4] Success rates listed are state success rates.