Application to Renew a Charter School Agreement

General Information

Name of Charter School	Bluff City High School
CMO Name (if applicable)	IOTA Community Schools
Mailing Address	6000 Poplar Ave., Suite 250 Memphis, TN 38119
School Phone	(901) 730-8157
School Website	iotaschools.org
Current School Leader	Jocquell Rodgers

Primary School Contact for Renewal Application

Name of Primary Contact	Tiffany Shivers
Title of Contact	Grants and Strategic Initiatives Analyst
Contact Telephone	(815) 573-8076
Contact E-Mail Address	tiffany.shivers@iotaschools.org

Charter Agreement

Current Authorizer	Tennessee Charter Commission
First School Year of Operation	2017
Year Current Charter Term Began	2017-2018
School Year Current Charter Expires	2026-2027

Student Demographics

Total Current Enrollment	440
% Economically Disadvantaged	48%
% of Students with Disabilities	12%
% of English Language Learners	19.2%

Proposed Grades / Enrollment for New Charter Term

School Year (.g., Y1-2026-27)	Proposed Grade Levels	Proposed Student Enrollment
Y1 - 2026-2027	9,10, 11, 12	525
Y2 - 2027-2028	9,10, 11, 12	536
Y3 - 2028-2029	9,10, 11, 12	546
Y4 - 2029-2030	9,10, 11, 12	557
Y5 - 2030-2031	9,10, 11, 12	565
Y6 - 2031-2032	9,10, 11, 12	574
Y7 - 2032-2033	9,10, 11, 12	580
Y8 - 2033-2034	9,10, 11, 12	586
Y9 - 2034-2035	9,10, 11, 12	591
Y10 -2035-2036	9,10, 11, 12	597

Section I: Academic Success

1. **Describe the school's academic achievement (TCAP), and growth results (TVAAS) over the course of the current charter term. For high schools, describe the school's graduation rates and ACT data. Include tables, charts, or graphs, as applicable, to illustrate cumulative and/or yearly TCAP results. Schools may supplement state assessment data with internal school assessment data such as NWEA MAP, iReady, etc.**

Student Population Context

Bluff City High School exists to serve students who have historically been underserved by traditional educational systems and to demonstrate that their potential is not determined by their starting point. The data in this section reflects both the magnitude of that challenge and the evidence that Bluff City's instructional model is meeting it. One fact is essential to interpreting every number that follows: incoming 9th graders arrive at Bluff City approximately four grade levels behind in both math and reading, as measured by AimsWeb diagnostics each fall. This is our starting line. Every proficiency point gained, every growth score earned, and every graduate who walks across the stage represents acceleration against a significant academic deficit. The academic data below is evidence of how far students have come and how fast they are moving.

Student Demographics

School / Entity	% BHN	% Econ. Disadv.	% Eng. Learners	% SWD

Bluff City HS	96.3%	48%	19.2%	12.2%
Surrounding Neighborhood HS (avg)	>95%	~47%	~9%	~9%
MSCS	94%	53%	13%	11%
State of Tennessee	39%	29%	9%	15%

TNReady (TCAP) Academic Achievement: Full Charter Term History

TNReady (TCAP) Academic Achievement

A consistent pattern emerges across subjects over the charter term: a low starting point, a COVID-driven decline, and a clear, accelerating recovery over the past two years.

Subject	Entity	2019	2021	2022	2023	2024	2025	Growth '23–'24	Growth '24–'25
Algebra I	**Bluff City**	3.3%	0.0%	1.8%	1.3%	8.0%	14.0%	**+6.7pp**	**+6.0pp**
	MSCS	12.1%	5.0%	7.7%	10.7%	13.6%	16.3%	**+2.9pp**	**+2.7pp**
	State of TN	27.4%	18.3 %	20.7 %	23.2%	27.5%	29.4%	**+4.3pp**	**+1.9pp**
English II	**Bluff City**	10.9%	7.4%	14.5 %	23.0%	38.0%	28.0%	**+15.0pp**	**-10.0pp**
	MSCS	24.5%	19.5 %	29.4 %	35.6%	36.7%	36.2%	**+1.1pp**	**-0.5pp**
	State of TN	42.7%	37.4 %	45.9 %	49.4%	50.6%	54.6%	**+1.2pp**	**+4.0pp**
Geometry	**Bluff City**	7.4%	1.0%	2.4%	0.0%	5.8%	6.7%	**+5.8pp**	**+0.9pp**
	MSCS	17.5%	6.6%	10.4 %	12.9%	19.9%	20.1%	**+7.0pp**	**+0.2pp**
	State of TN	33.9%	23.9 %	26.2 %	28.6%	35.4%	36.8%	**+6.8pp**	**+1.4pp**
Algebra II	**Bluff City**	—	0.0%	0.0%	3.2%	10.8%	5.4%	**+10.8pp***	**-5.4pp**
	MSCS	—	4.8%	10.3 %	10.4%	13.9%	18.4%	**+3.6pp***	**+4.5pp**
	State of TN	—	19.0 %	25.6 %	25.6%	31.6%	34.6%	**+6.0pp***	**+3.0pp**
English I	**Bluff City**	7.9%	5.2%	11.4 %	7.4%	10.3%	8.0%	**+2.9pp**	**-2.3pp**

Subject	Entity	2019	2021	2022	2023	2024	2025	Growth '23–'24	Growth '24–'25
	MSCS	16.5%	16.7 %	19.9 %	18.5%	19.7%	18.5%	+1.2pp	-1.2pp
	State of TN	32.7%	30.2 %	34.9 %	35.4%	35.4%	39.2%	0.0pp	+3.8pp
Biology	**Bluff City**	—	9.1%	4.5%	8.7%	11.8%	5.1%	+7.3pp*	-6.7pp
	MSCS	—	22.2 %	19.2 %	22.6%	26.7%	26.9%	+7.5pp*	+0.2pp
	State of TN	—	41.1 %	41.2 %	42.9%	45.3%	45.7%	+4.1pp*	+0.4pp

** Algebra II and Biology Growth columns marked with * reflect '22–'24 growth period. Green shading = positive growth. Orange shading = decline. Blue rows = Bluff City data.*

Mathematics tells the clearest turnaround story: Algebra I grew from 0% in 2021 to 14.0% in 2025, with growth rates more than double MSCS in both 2024 and 2025. Geometry recovered from 0% in 2023 to 6.7%, with current-year benchmark data showing dramatic further gains. English II reached a historic 38.0% in 2024, the first time Bluff City outperformed MSCS in any subject, before a 2025 decline to 28.0% that the school acknowledges directly; that figure still exceeds every pre-2024 year. Biology and Algebra II each experienced 2025 dips tied to specific cohort factors, with current year data indicating recovery.

Subgroup Comparative Performance — Commission Framework

The Commission's School Performance Framework measures subgroup proficiency relative to the same subgroup in MSCS. The data below reflects Bluff City's performance on this measure across all four tracked subgroups in HS Math and HS English from 2021 through 2025. The TVAAS growth data that follows provides the complementary picture of student progress within the same period.

English Learners — HS Math and HS English

Year	Subject	BCHS EL Prof Rate	MSCS EL Prof Rate	BLF-MSCS Comparison	Score
2021	HS ELA	9.1%	4.9%	+4.2%	Exceeded
2022	HS ELA	14.3%	6.7%	+7.6%	Exceeded
2023	HS ELA	3.6%	9.2%	-5.6%	Not Met
2024	HS ELA	10.7%	8.3%	+2.4%	Met
2025	HS ELA	7.7%	10.0%	-2.3%	Met
2021	HS Math	0%	2.3%	-	Not Met *Within 3% of MSCS
2022	HS Math	0%	3.0%	-	Not Met *Within 3% of MSCS

2023	HS Math	3.2%	3.6%	-0.4%	**Met**
2024	HS Math	5.7%	5.9%	-0.2%	**Met**
2025	HS Math	17.5%	9.0%	+8.5%	**Exceeded**

In HS Math, BCHS EL students outperformed MSCS EL students by 8.5 percentage points in 2025, 17.5% vs. 9.0%, earning an “Exceeded” standard Commission rating, the highest possible. In HS English, the Commission rating was “Exceeded” in 2021 and 2022, “Not Met” in 2023, and "Met" in both 2024 and 2025. TVAAS Level 5 growth for English Learners in 2025, the highest possible growth score, reflects the academic acceleration this population is experiencing.

Students with Disabilities — HS Math and HS English

Year	Subject	BCHS SWD Prof Rate	MSCS SWD Prof Rate	BLF-MSCS Comparison	Score
2021	HS ELA	0.0%	1.4%	-1.4%	**Not Met *Within 3% of MSCS**
2022	HS ELA	5.9%	2.9%	+3.0%	**Met**
2023	HS ELA	0.0%	11.4%	-11.4%	**Not Met**
2024	HS ELA	4.2%	5.4%	-1.2%	**Met**
2025	HS ELA	0.0%	7.6%	-7.6%	**Not Met**
2021	HS Math	0.0%	<1%	–	**Not Met *Within 3% of MSCS**
2022	HS Math	0.0%	1.9%	-1.9%	**Not Met *Within 3% of MSCS**
2023	HS Math	0.0%	6.9%	-6.9%	**Not Met**
2024	HS Math	3.0%	3.8%	-0.8%	**Met**
2025	HS Math	2.6%	7.7%	-5.1%	**Not Met**

Students with Disabilities comparison performance has been largely “Not Met” across both subjects and most years, with “Met” standard achieved in HS English in 2022 and 2024, and in HS Math in 2024. The school acknowledges this directly. The absolute proficiency numbers for this subgroup remain near 0% in most subjects and years, a challenge directly tied to students arriving with compounded entry-level deficits and the complexity of serving a wide range of disability types at the high school level. The most meaningful progress indicator for this subgroup is not the proficiency comparison but TVAAS growth, which improved from Level 2 to Level 3 in 2025, matching the state average for the first time, and the Q2 2025-26 benchmark showing SWD students at 32% “Met/Exceeded”, the highest rate of any subgroup. These are the leading indicators the school is tracking.

Economically Disadvantaged — HS Math and HS English

Year	Subject	BCHS ED Prof Rate	MSCS ED Prof Rate	BLF-MSCS Comparison	Score
2021	HS ELA	6.2%	11.4%	-5.2%	Not Met
2022	HS ELA	9.9%	16.9%	-7.0%	Not Met
2023	HS ELA	11.8%	18.6%	-6.8%	Not Met
2024	HS ELA	16.0%	21.1%	-5.1%	Not Met
2025	HS ELA	15.7%	22.9%	-7.2%	Not Met
2021	HS Math	0.0%	2.2%	-2.2%	Not Met *Within 3% of MSCS
2022	HS Math	0.6%	4.5%	-3.9%	Not Met
2023	HS Math	1.1%	6.3%	-5.2%	Not Met
2024	HS Math	7.9%	11.4%	-3.5%	Not Met
2025	HS Math	10.8%	15.2%	-4.4%	Not Met

The Commission comparison rating for economically disadvantaged students has been largely “Not Met” across both subjects and all years, a result the school acknowledges directly and without qualification. However, two critical contextual points are essential to honest interpretation. First, the absolute proficiency trajectory for ED students is strongly positive: HS Math grew from 0.0% in 2021 to 10.8% in 2025, and HS English from 6.2% to 15.7%, meaningful gains even as the gap to MSCS ED students persists. Second, and most significantly, the internal achievement gap between ED and non-ED students within Bluff City has essentially closed: in 2025 ED students surpass non-ED peers in HS Math by +3.2 percentage points and trail by just -0.9 points in HS English, near parity. A school where economically disadvantaged students are outperforming their non-ED peers is not a school where poverty is determining outcomes, even when the comparison to the district subgroup remains a work in progress.

Black, Hispanic, Native American — HS Math and HS English

Year	Subject	BCHS BHN Prof Rate	MSCS BHN Prof Rate	BLF-MSCS Comparison	Score
2021	HS ELA	6.2%	15.4%	-9.2%	Not Met
2022	HS ELA	13.0%	21.9%	-8.9%	Not Met
2023	HS ELA	14.6%	24.8%	-10.2%	Not Met
2024	HS ELA	20.2%	25.9%	-5.7%	Not Met
2025	HS ELA	15.6%	25.6%	-10.0%	Not Met
2021	HS Math	0.3%	3.2%	-2.9%	Met
2022	HS Math	1.5%	6.8%	-5.3%	Not Met

2023	HS Math	1.4%	8.8%	-7.4%	**Not Met**
2024	HS Math	7.6%	13.4%	-5.8%	**Not Met**
2025	HS Math	8.8%	16.3%	-7.5%	**Not Met**

BHN comparison performance has been “Not Met” in both subjects across most of the charter term. BHN HS English proficiency grew from 6.2% in 2021 to a peak of 20.2% in 2024, and HS Math from 0.3% to 8.8% over the same period. Given that over 95% of Bluff City's student population is BHN, this subgroup's trajectory is essentially the school's overall trajectory. The TVAAS growth story, Black students at Level 5 in 2024 and Level 4 in 2025, Hispanic students at Level 5 in both 2024 and 2025, is the most meaningful measure of whether the instructional model is working for this population, and on that measure the answer is clearly yes.

The TVAAS growth data below reflects student academic progress across the same period.

TVAAS Growth Scores: Sustained Exceptional Student Progress

Bluff City's official TVAAS Schoolwide Composite, the Commission's primary growth metric, reflects the following results across the charter term:

Full Charter Term TVAAS

Year	TVAAS Score
2018	**5**
2019	**5**
2020	–
2021	**1**
2022	**1**
2023	**1**
2024	**5**
2025	**4**

After three consecutive years at Level 1, the lowest possible, Bluff City achieved Level 5 in 2024 and sustained Level 4 in 2025, both above the state average of Level 3. This is not a one year anomaly. It is two consecutive years of above average growth following three years of below average performance, directly validating the instructional improvements implemented during the corrective action period.

Subgroup growth is measured through the Literacy and Numeracy TVAAS composite, the metric available at the subgroup level. In 2025, every tracked subgroup met or exceeded the state average for the first time in school history:

Full Charter Term TVAAS (Numeracy and Literacy) History by Subgroup

Year	2023	2024	2025	Status
All Students	3	5	5	★ Highest Possible
Economically Disadvantaged	3	5	4	Above Average
English Learners	3	3	5	★ Highest Possible
Students with Disabilities	2	2	3	Improved-At State Average
Black Students	3	5	4	Above Average
Hispanic Students	3	5	5	★ Highest Possible
TN State Average	3	3	3	**Baseline**

English Learners achieved TVAAS Level 5 in 2025, the highest possible growth score. Hispanic students achieved Level 5 in both 2024 and 2025, and Black students achieved Level 5 in 2024 and Level 4 in 2025. Students with Disabilities improved from Level 2 to Level 3 in 2025, reaching the state average for the first time. Economically disadvantaged students achieved Level 5 in 2024 and Level 4 in 2025, both above the state average of Level 3.

iReady (now AimsWeb) Diagnostic Growth (Math and Reading)

Bluff City administers AimsWeb diagnostics three times annually to capture growth throughout the year. The 2024-25 results are extraordinary across both subjects. In math, students grew from 14.4% to 39.4% on or above grade level within a single year, more than double any prior year's gain, at 327% of the typical growth goal. Reading on or above grade level grew 14.7 percentage points, at 203% of the typical growth goal, meaning students exceeded the national growth benchmark in both subjects simultaneously. Together, these results represent the strongest within-year academic performance in school history and reflect the cumulative impact of the school's instructional investments, intervention systems, and the dramatic improvement in student attendance that ensures students are present to receive instruction.

School Year	Math Fall	Math Spring	Math Gain	% of Typical Growth Goal	Reading Fall	Reading Spring	Reading Gain	% of Typical Growth Goal
2023	4.1%	7.4%	+3.3pp	149%	9.5%	12.4%	+2.9pp	123%
2024	7.3%	18.6%	+11.3pp	192%	14.4%	18.8%	+4.4pp	128%
2025	14.4%	39.4%	+25pp	327%	16.2%	30.9%	+14.7pp	203%

Q2 and Q3 2025–26 Predictive Benchmark Assessment

The Quarter 2 Predictive Assessment, administered in the 2025–26 school year, provides the most timely and forward looking measure available. This data reflects how students are tracking toward

spring TNReady proficiency levels and it is the strongest current year evidence of Bluff City's academic trajectory.

Q2 Results

Course	# Tested	# Met/Exc	Avg Score	% Below	% Approach	% Met	% Exceeded	% Met/ Exc
English 9	83	19	44.9	14%	63%	18%	5%	**22.9%**
English 10	92	23	44.4	28%	47%	22%	3%	25.0%
Algebra I	76	6	32.4	51%	41%	7%	1%	7.9%
Geometry	102	51	48.5	9%	41%	48%	2%	**50.0%**
Algebra II	92	11	32.6	41%	47%	12%	0%	**12.0%**
Biology	108	40	50.8	33%	30%	32%	5%	**37.0%**

Q3 Results

Course	# Tested	# Met/Exc	Avg Score	% Below	% Approach	% Met	% Exceeded	% Met/ Exc
English 9	91	10	38.1	21%	68%	11%	0%	11%
English 10	92	27	43.5	37%	34%	25%	4%	**29%**
Algebra I	103	9	33.4	76%	16%	5%	4%	9%
Geometry	99	44	53.6	34%	21%	30%	14%	**44%**
Algebra II	95	8	35.7	75%	17%	8%	0%	8%
Biology	96	22	40.9	60%	17%	19%	4%	**23%**

Q3 results show Geometry (44.4%) and Biology (22.9%) surpassing Double AMO, with both courses also showing meaningful year over year improvement compared to prior year Q3. English 10 (29.3%) surpasses AMO and continues a positive trajectory. Geometry continues its remarkable trajectory with strong student growth gains. Algebra I and English 9, while below Double AMO, both show year over year Q3 improvement. The Q3 dip in English 9 “Met/Exceeded” from Q2 reflects the challenge of sustaining gains mid-year for this cohort and will be a targeted focus through spring TNReady preparation. The dramatic reduction in chronic absenteeism year-to-date in 2025-26, from 66.3% in 2022-23 to 26.7%, means students are receiving more instructional time than in any prior year, a fact reflected in the Q2 and Q3 benchmark data below.

Graduation Rates

Bluff City's four-year graduation rate peaked at 83.3% in 2022 before declining to 75.7% in 2024, coinciding directly with years of highest chronic absenteeism and teacher turnover. The preliminary 2025 graduation rate of 76.2% reflects a clear recovery. In the 2025–26 school year, IOTA’s’ Student Attendance Review Team has reduced chronic absenteeism by nearly 50% year-to-date through targeted, intensive efforts, directly addressing a key driver of the earlier decline in graduation rates.

Graduation Year	Graduation Rate	Year-over-Year	MSCS Graduation Rate	TN Graduation Rate	Notes
2021	78.5%	—	77.7%	88.7%	Post-COVID baseline
2022	**83.3%**	**+4.8pp**	**80.1%**	**89.8%**	**Charter-term high**
2023	82.2%	-1.1pp	80.1%	86.5%	Strong performance
2024	**75.7%**	**-6.5pp**	**82.8%**	**89.2%**	**Absenteeism/turnover impact**
2025	76.2%	+0.5pp	84.1%	90.5%	Recovery trajectory

Ready Graduate Rate and College and Career Ready Rates

Bluff City's Ready Graduate rate climbed from 8.9% in 2021 to 52.3% in 2024, surpassing MSCS (47.7%) for the first time in school history and coming within 0.8 points of the state (53.1%). The 2023–24 gain of +31.5 percentage points compared to +11.1pp for MSCS and +4.2pp for the state stands as perhaps the single most powerful illustration of what Bluff City's instructional model is capable of producing.

The College & Career Ready (CCR) rate, now the state's primary accountability metric beginning 2025–26, tells an equally striking story: from 3.0% in 2023 to 66.7% in 2024, sustained at 61.0% in 2025. Bluff City enters the renewal term with two consecutive years above 60% on this federal measure.

Graduation Year	RG-Bluff City	RG-MSCS	RG-State of TN	CCR Bluff City
2021	8.9%	23.0%	39.7%	
2022	16.7%	26.2%	43.3%	
2023	20.8%	36.6%	48.9%	3.0%
2024	**52.3%**	**47.7%**	**53.1%**	**66.7%**
2025	**69.8%***			**61%**

**Unofficial estimate*

ACT Performance

Bluff City's ACT composite average has grown steadily from 14.0 in 2021 to 14.9 in 2025, consistent with the school's overall academic improvement trajectory. BHN and economically disadvantaged students track closely with the overall average throughout the charter term. The gap to the statewide average of 18.9 remains an area of focus for the renewal term, with ACT preparation integrated into daily instruction, expanded dual enrollment opportunities, and industry certification pathways all designed to accelerate college readiness gains.

The statewide ACT average of approximately 18.9 represents a meaningful gap that directly reflects the magnitude of the freshman achievement deficit at Bluff City. Charter renewal will provide Bluff City the opportunity to continue building on its existing instructional framework and schoolwide structures in order to address this deficit with greater consistency and impact.

Graduation Year	All Students	BHN Students	Econ. Disadv.	English Learners	TN State Avg
2021	14.0	14.0	14.1	13.6	18.9
2022	14.5	14.5	14.6	*	18.9
2023	14.5	14.4	14.3	*	18.9
2024	14.5	14.4	14.4	13.3	18.9
2025	**14.9**	**14.9**	**14.8**	**13.9**	**18.9**

** Subgroups too small to be reportable.*

2. Address progress toward meeting the academic goals outlined in the current charter agreement. Were any amendments made to the academic goals? If so, explain.

Of the 15 goals assessed, five original and ten amended, Bluff City has met or exceeded 9, is near goal on 2, has partial credit on 2, and has not met 2. The four goals not completely met (original and amended graduation rate, original TNReady proficiency target, and original ACT) are structurally linked to the entry-level academic deficit Bluff City's students carry. The most aggressive intervention for both, reducing chronic absenteeism, which dropped nearly 50% this year, is already showing measurable results. The two strongest goal categories are growth and culture, evidence of a school that has identified the right levers and pulled them with intentionality to begin to produce academic success. .

Goal	Status	Evidence
Goal 1: TNReady proficiency +5pts/yr/subgroup	Partially Met	Net gains in math and ELA; growth rate 2x+ district in last 2 years
Goal 2: TVAAS growth (all subgroups)	**EXCEEDED**	Level 5 school-wide (2024), Level 4 (2025); all subgroups ≥ 3 in 2025
Goal 3: 90% graduation rate	Not Met	Range 75.7–83.3%; root cause (absenteeism) now being addressed
Goal 4: ACT +0.5pts/year	Partially Met	14.0 → 14.9; school-record 2025 composite; pandemic cohort impact
Goal 5: Lexile 1.5yr growth / D/F ≤15%	**EXCEEDED**	Lexile (% Met)-9th grade:40.6%;10th grade: 59.4%, 11th grade: 51.9%; 12th grade: 48.9%; Overall: 49.6% D/F's- 2025:7.5%
AMENDED: Math AimsWeb 15pp Tier I growth	**EXCEEDED**	25.0pp gain; 327% of national growth goal in 2024–25
AMENDED: ELA AimsWeb 15pp Tier I growth	Near Goal	14.7pp gain; 0.3pp below target; Q2 2025–26 tracking positively

AMENDED: School TVAAS ≥ 4	**EXCEEDED**	Level 5 in 2024 and Level 4 in 2025
AMENDED: All subgroups TVAAS ≥ 3	**MET**	All subgroups ≥ 3 in 2025 for first time in school history
AMENDED: Growth 25 Score ≥ 3	**EXCEEDED**	Score of 5 (highest possible) in 2024–25
AMENDED: Graduation rate +10%/yr to state avg	Not Met	Recovery underway; 2025–26 attendance breakthrough addresses root cause
AMENDED: ADA increase 5%/yr to 95%	**MET (2025–26)**	90.5% YTD; 6.1pp gain; 90% goal met for first time
AMENDED: CCR rate ≥ 75%	Near Goal	61.0% in 2025; up from 3.0% in 2023; renewal term target achievable
AMENDED: Chronic absenteeism −10%/yr to 20%	**EXCEEDED**	26.7% YTD; 29.1pp single-year drop; approaching 20% target
AMENDED: Suspension rate −10%/yr (all subgroups)	**MET (2025–26)**	9.3% YTD; 9.7pp reduction; restorative practices taking hold

Original Goals: Narrative Assessment

Goal 1 — TNReady Proficiency (+5pts/yr/subgroup): Against the cumulative 25 point target, Bluff City fell short. Math proficiency grew from 2.8% to 9.0% (net +6.2pts) and ELA from 2.3% to 16.2% (+13.9pts). The school acknowledges this shortcoming. However, the growth rate tells a materially different story: Algebra I proficiency grew 12.7 percentage points from 2023–2025, more than double MSCS and the state. English II jumped 15 points in a single year, more than twelve times the district and state rates. These are the leading indicators of an instructional model now producing results at scale.

Goal 2 — TVAAS Growth: Bluff City earned TVAAS Level 5 in 2024 and sustained Level 4 in 2025, a remarkable turnaround from Level 1 in 2021. In 2025, every tracked subgroup met or exceeded the state average for the first time in school history. This includes Students with Disabilities, who have historically fallen below average, reaching parity with the state average.

Goal 3 — Graduation Rate (90%): Rates have ranged from 75.7% to 83.3%, and the school acknowledges the gap without qualification. Chronic absenteeism, the strongest predictor of credit deficiency and risk of dropping out, peaked at 66.3% in 2022-23 and has dropped to 26.7% year to date in 2025-26, directly addressing the root cause of prior graduation rate declines. The preliminary 2025 rate of 76.2% reflects an early recovery, and the 90% end of term renewal target is supported by the attendance infrastructure now in place.

Goal 4 — ACT Composite (+0.5pts/yr): The composite grew from 14.0 to 14.9, with the 2025 class posting the school's highest-ever result. Against the original target, the school has not kept pace, with pandemic cohorts carrying cumulative academic disruption regardless of in school growth. Addressing this gap remains a central priority, and the school is focused on building on its existing efforts to improve outcomes for future cohorts.

Goal 5 — Lexile Growth / D/F Rate: Exceeded on both measures, nearly half of all students (49.6% overall) met the 1.5 year Lexile growth target, with 10th grade leading at 59.4% and strong performance across all cohorts, 9th grade at 40.6%, 11th grade at 51.9%, and 12th grade at 48.9%. The D/F rate of 7.5% in 2025 is well below the 15% ceiling, cutting the allowable threshold nearly in half and reflecting both the school's academic intervention model and the broader culture improvements driving student engagement and completion.

Goal Amendments

Academic goals were amended during the charter term as part of IOTA's adoption of a network-wide Annual School Goals framework.

Math Internal Growth (iReady/AimsWeb 15pp Tier I): Exceeded — a 25pp within year gain at 327% of the national growth goal is the clearest single-year evidence that Bluff City's math instructional model is producing transformational results. TNReady math grew 1.2 points year over year, below the +10pp target, though Algebra I alone grew 6.0 points, more than double the district. Q3 2025–26 shows Geometry at 44.4% Met/Exceeded and 25% of Algebra I students making 10+ point gains, signaling spring 2026 TNReady math results are on track to be the strongest of the charter term.

ELA Internal Growth (iReady/AimsWeb 15pp Tier I): Near goal at 14.7pp, within 0.3 points of the diagnostic target. Students averaged 203% of the typical reading growth goal, exceeding the national benchmark. TNReady English declined in 2025. The ELA intervention plan, which has seen strengthened Tier 1 literacy, academic language development, and ESL-ELA co-planning, is designed to reverse this trajectory. Q3 English 10 at 29.3% Met/Exceeded (above Double AMO) and 14% above prior year Q3 indicates an upward trend.

School TVAAS ≥ 4 and All Subgroups ≥ 3: Both exceeded. Bluff City was TVAAS Level 5 in 2024, Level 4 in 2025, with every subgroup at or above the state average for the first time in school history in 2025. Students with Disabilities reaching Level 3 after two years at Level 2, and English Learners earning Level 5 while simultaneously acquiring language proficiency, are the most meaningful subgroup milestones of the charter term.

Growth 25 Score ≥ 3: Exceeded with a score of 5. This means even Bluff City's lowest performing students are growing at the highest measurable rate statewide. This, combined with TVAAS Level 5, confirms the instructional model is lifting all students, not just those closest to proficiency.

Culture Goals (Graduation Rate, ADA, CCR, Chronic Absenteeism, Suspension Rate): Chronic absenteeism and suspension rate goals appeared in the original charter under Student and Family Engagement. What changed through the amendment process were the specific numeric targets, replacing the original 1% per year absenteeism reduction and 25% per year suspension reduction with more defined floors tied to network-wide accountability benchmarks, and the addition of new culture goals including Average Daily Attendance (ADA), College and Career Ready(CCR) rate, and graduation rate trajectory. As documented throughout this application, culture and academic achievement are inseparable at Bluff City. The culture goal data tells the story of the conditions that enable academic progress. The 29.1pp drop in chronic absenteeism, the suspension rate cut nearly in half, the first-ever achievement of the 90% attendance goal, and two consecutive years above 60% on the federal CCR measure are not isolated wins. They are the structural foundation on which the

renewal term's academic targets will be achieved. The CCR trajectory from 3.0% in 2023 to 66.7% in 2024 and 61.0% in 2025 represents a fundamental shift in the academic profile of Bluff City graduates, and the 75% renewal term target is achievable with continued expansion of dual enrollment, ACT preparation, and industry certification pathways.

3. **Outline the school's current assessment system and explain how assessments are used to inform instructional practice, evaluate teacher effectiveness, and implement professional development.**

Bluff City maintains a multi-tiered assessment system providing continuous data across all core subjects: daily common exit tickets, weekly IOTA Comprehensive Assessment Program (CAP) assessments mirroring TNReady rigor, quarterly Mastery Connect Predictive Assessments, AimsWeb diagnostic universal screeners administered three times annually, ELPA21 for English Learners, and TNReady/End-of-Course state assessments.

Informing Instructional Practice: Assessment data drives decisions at every level. Exit ticket results below 70% mastery trigger re-teaching before moving forward. Weekly CAP data is reviewed in PLCs to guide pacing; Mastery Connect results are analyzed standard-by-standard, with intervention plans triggered below 75% mastery. AimsWeb drives RTI² tiered placement for at-risk students, with data team meetings every 4.5 weeks to adjust intervention levels. Student Work Analysis (SWA) helps teachers identify patterns in student understanding and misconceptions, informing differentiated instructional responses for all students. Current ELPA21 results inform ESL-ELA co-planning, integrating language acquisition progress into core content decisions.

Evaluating Teacher Effectiveness: Bluff City uses the state-approved TEAM rubric with observations conducted multiple times per semester. Pre-observation conferences connect lesson design to recent assessment results; post-observation debriefs center on instructional impact. Evaluators examine AimsWeb growth, exit ticket trends, Mastery Connect mastery rates, TNReady scores, and individual teacher TVAAS scores, weighted as required under state TEAM guidelines, to ensure evaluation reflects evidence of student learning.

Professional Development: PD flows directly from assessment data. School-wide standard gaps drive immediate, targeted professional development. Network Wednesday collaboration sessions bring content teachers together to review school data and share best practices. IOTA Curriculum Specialists provide weekly coaching and model lessons grounded in assessment findings, with differentiated coaching and co-teaching support for teachers whose students demonstrate lower than expected growth.

This seamless integration of assessment, instruction, evaluation, and development is a significant driver of Bluff City's improvement trajectory and reflects the school's core commitment to data-driven decision making as a continuous, school-wide practice.

4. **Describe how the school uses other data (qualitative and quantitative) to evaluate the effectiveness of the academic program.**

Bluff City employs a rigorous data system integrating both quantitative and qualitative sources to continuously evaluate and improve its academic program. At the network level, IOTA's six-step data cycle spanning vision, data display, collection, analysis, action planning, and evaluation ensures data is systematically acted upon at every level. The Principal, Executive Director, and Chief of Academic

Advancement conduct monthly data analysis meetings to refine the school improvement plan, while teachers and leaders conduct weekly reviews analyzing performance trends, subgroup data, and program indicators in real time.

Quantitative sources include daily attendance and chronic absenteeism (Google Looker/PowerSchool), discipline trends (Culture Dashboard), enrollment and retention rates, credit accumulation, course completion, and teacher observation scores through the state-approved TEAM Rubric.

Qualitative sources include annual student, parent, and community stakeholder surveys; twice-yearly BESS CORE SEL surveys measuring social-emotional competencies; student focus groups; weekly Culture Team walkthroughs; Advisory self-assessments and SMART goal documentation; teacher PLC feedback; teacher exit interviews; and home visit findings from SART. Annual family satisfaction surveys reflect a dramatic improvement, from 57.1% in 2021-22 to 91.4% in 2024-25, directly measuring community confidence in the academic program.

What distinguishes Bluff City's approach is not data collection itself but the direct line from data to action. The most powerful example of this is the school's response to chronic absenteeism data. Attendance monitoring through Google Looker and PowerSchool revealed a persistent and worsening challenge. The chronic absenteeism rate climbed from 23.3% in 2017-18 to a charter-term high of 66.3% in 2022-23. Qualitative data from home visits and family conversations uncovered root causes including transportation barriers, untreated health needs, and food insecurity that quantitative data alone could not explain. Together, these data sources drove the implementation of the Student Attendance Review Team (SART). SART focused on daily monitoring, daily absence calls, home visits after three unexcused absences, individualized attendance plans, and barrier removal through LifeDoc Health and Mid-South Food Bank partnerships. The results are measurable and show significant improvement:

School Year	Chronic Absenteeism Rate	Year-over-Year Change	Attendance Rate	Notes
2017–2018	23.3%	—	91.8%	Pre-term baseline
2018–2019	29.9%	+6.6pp	90.2%	
2019–2020	34.7%	+4.8pp	92.1%	
2020–2021	58.4%	+23.7pp	75.9%	COVID impact
2021–2022	**62.4%**	**+4.0pp**	**82.4%**	**COVID recovery period**
2022–2023	**66.3%**	**+3.9pp**	**84.5%**	**Charter-term high**
2023–2024	**56.0%**	**-10.3pp**	**85.3%**	**Interventions begin**
2024–2025	**55.8%**	**-0.2pp**	**84.4%**	**Sustained improvement**

2025–26 (YTD)	**26.7%**	**-29.1pp**	**90.5%**	**Dramatic drop — attendance target met**

Year-to-date 2025-26, chronic absenteeism has dropped to 26.7%, the single largest year-over-year improvement in school history, and the attendance rate has reached 90.5%, meeting the 90% attendance goal for the first time since before COVID. Suspension data followed the same pattern. Culture Dashboard monitoring revealed a spike to 19.0% in 2024-25, triggering restorative practice training and restructured discipline protocols that have dropped the rate to 9.3% year-to-date in 2025-26.

Teacher exit interview data identified compensation and support gaps driving high turnover, directly informing salary restructuring and expanded coaching pathways now underway. Declining SEL scores activate Tier 2 RTI²-B interventions before academic risk escalates, and walk-through data triggers immediate coaching responses.

The result is visible in Bluff City's trajectory from probationary status in 2022 to exceeding standards in multiple areas by 2024-25, a transformation not driven by chance, but by a school culture where data always leads to action.

5. **Discuss progress made toward closing achievement gaps, including students with disabilities, English Learners, and economically disadvantaged.**

Bluff City's achievement gap data reflects a school in motion. In 2025, every student subgroup met or exceeded the state average TVAAS growth rate for the first time in school history. The data below shows how far each subgroup has come and how fast they are moving.

English Learners

Bluff City's English Learner achievement gap, measured against non-EL students within the school, tells two distinct stories that together reflect both the school's greatest area of relative progress and its area of continued focus.

Test	Year	EL	Non-EL	Gap
HS Math	2018	0.0%	3.3%	-3.3%
	2019	4.9%	5.3%	-0.4%
	2021	0.0%	0.3%	-0.3%
	2022	0.0%	1.7%	-1.7%
	2023	3.2%	1.3%	2.0%
	2024	5.7%	8.1%	-2.4%
	2025	17.5%	7.8%	9.7%
HS ELA	2018	0.0%	2.5%	-2.5%
	2019	9.5%	9.3%	0.2%
	2021	9.1%	5.8%	3.3%
	2022	14.3%	12.9%	1.4%
	2023	3.6%	15.0%	-11.5%

Test	Year	EL	Non-EL	Gap
	2024	11.1%	21.3%	-10.2%
	2025	7.7%	17.3%	-9.6%

Mathematics: ELs Now Surpassing Non-EL Peers

EL students at Bluff City now outperform their non-EL peers in HS Math. After beginning the charter term at -3.3% in 2018, the gap closed steadily and turned positive in 2023 (+2.0%). In 2025, EL students surpassed non-EL peers in HS Math by +9.7 percentage points, 17.5% vs. 7.8%, the widest positive margin in school history. While absolute proficiency levels remain low for all students, EL students are making greater academic progress in mathematics than their non-EL peers despite the additional challenge of simultaneously acquiring English, a result that has strengthened consistently over the past two years. TVAAS Level 5 growth for English Learners in 2025, the highest possible growth score, further confirms this trajectory. Across every measure of growth, the same story emerges: Bluff City's students are accelerating.

English: Gap Acknowledged, Narrowing

The internal HS English gap tells a more complex story. EL students surpassed non-EL peers in English in 2019 (+0.2%), 2021 (+3.3%), and 2022 (+1.4%), three of the first five measurable years. A significant gap opened in 2023 (-11.5%), coinciding with the broader ELA proficiency decline the school experienced school-wide that year. The gap has narrowed in each subsequent year, from -11.5% in 2023 to -10.2% in 2024 to -9.6% in 2025, a slow but consistent improvement trajectory. The school acknowledges this gap directly. The Q2 2025-26 benchmark shows EL students at 26% Met/Exceeded on combined Math and ELA, above the all-student average of 25%, suggesting the narrowing trend is continuing into the current year.

The renewal term commitments, intensive core content, instructional coaching, dedicated ESL specialist, collaboration time in the master schedule, academic language development integration, and network-wide professional development focused on multilingual learner scaffolding, are specifically designed to accelerate ELA gap closure while sustaining the math gains already achieved. TVAAS Level 5 growth for English Learners in 2025 confirms the instructional model is working. The task for the renewal term is ensuring that growth translates equally into ELA proficiency outcomes.

Students with Disabilities

Bluff City's SWD achievement gap, measured against non-SWD peers within the school, remains the school's most significant and openly acknowledged challenge. The high school Math and English composite data presents a clear and candid picture:

Test	Year	SWD	Non-SWD	Gap
HS Math	2018	0.0%	3.6%	-3.6%
	2019	0.0%	6.4%	-6.4%
	2021	0.0%	0.3%	-0.3%
	2022	0.0%	1.6%	-1.6%
	2023	0.0%	1.5%	-1.5%
	2024	3.0%	8.4%	-5.3%

Test	Year	SWD	Non-SWD	Gap
	2025	2.6%	9.9%	-7.3%
HS ELA	2018	0.0%	2.9%	-2.9%
	2019	0.0%	11.7%	-11.7%
	2021	0.0%	6.6%	-6.6%
	2022	5.9%	13.7%	-7.8%
	2023	0.0%	15.0%	-15.0%
	2024	4.2%	21.9%	-17.7%
	2025	0.0%	18.1%	-18.1%

In HS Math, SWD students recorded their first non-zero composite results in 2024 (3.0%) and 2025 (2.6%), a meaningful milestone for a subgroup that had recorded 0% in every prior year. However, the gap has widened to -7.3% in 2025 as non-SWD students improved at a faster rate. In HS English, the gap has widened to -18.1% in 2025, reflecting the same school-wide ELA proficiency challenge that affects all students, compounded for students with disabilities.

The school acknowledges this directly and without qualification. Absolute SWD proficiency has remained near 0% across most subjects and years, a challenge the school acknowledges directly and is actively addressing through the renewal term commitments outlined below.

The most meaningful progress indicator is TVAAS growth, where Students with Disabilities improved from Level 2 in 2023 and 2024 to Level 3 in 2025, matching the state average for the first time in school history. The Q2 2025-26 benchmark reinforces this trajectory: SWD students achieved 32% Met/Exceeded on combined Math and ELA, the highest rate of any subgroup, surpassing All Students (25%), English Learners (26%), and Economically Disadvantaged (23%). For a subgroup that has recorded near 0% proficiency on TNReady in most subjects and most years, this benchmark result is striking and warrants careful monitoring through spring TNReady. The renewal term commitments, enhanced co-teaching, protected co-planning time, a dedicated SPED Master Teacher, and targeted skills based intervention, are designed to sustain and accelerate this growth into measurable proficiency gains.

Economically Disadvantaged Students

Economically disadvantaged students comprise 48% of Bluff City's enrollment and represent the core of the school's charter mission. The high school Math and English composite data highlights one of the most significant internal gap stories in this application:

Test	Year	ED	Non-ED	Gap
HS Math	2018	4.3%	0.0%	4.3%
	2019	4.5%	6.0%	-1.4%
	2021	0.0%	0.6%	-0.6%
	2022	0.6%	2.5%	-1.9%
	2023	1.1%	1.8%	-0.7%
	2024	7.9%	7.7%	0.2%

Test	Year	ED	Non-ED	Gap
	2025	10.8%	7.6%	3.2%
HS ELA	2018	2.2%	2.3%	-0.1%
	2019	8.5%	10.4%	-1.9%
	2021	6.2%	5.9%	0.3%
	2022	9.8%	17.0%	-7.2%
	2023	11.1%	16.4%	-5.3%
	2024	16.1%	24.1%	-7.9%
	2025	15.7%	16.7%	-0.9%

Mathematics: ED Now Surpassing Non-ED Peers

ED students now surpass their non-ED peers in HS Math by +3.2 percentage points in 2025 — 10.8% vs. 7.6%. The gap was positive in 2018 (+4.3%), turned negative through 2019–2023, returned to near parity in 2024 (+0.2%), and has now turned clearly positive again in 2025. While absolute proficiency levels remain low for all students, ED students are making greater academic progress in mathematics than their non-ED peers, a result that directly contradicts the assumption that economic disadvantage predicts underperformance relative to peers.

English: Gap Nearly Closed

The HS English gap tells an equally encouraging story. After widening to -7.9% in 2024, the internal ED vs. non-ED English gap has narrowed dramatically to just -0.9% in 2025, near parity. ED students are essentially matching their non-ED peers in HS English, with the gap narrowing by 7.0 percentage points in a single year. This is the most significant single-year gap closure of the charter term for this subgroup.

TVAAS reinforces this trajectory: economically disadvantaged students achieved Level 5 in 2024 and Level 4 in 2025, both above the state average, demonstrating sustained above-average growth acceleration. The Q2 2025-26 benchmark shows this subgroup at 23% Met/Exceeded, meeting the AMO of 21.1% and within 3 points of Double AMO.

The attendance connection is direct: the 29.1 percentage point drop in chronic absenteeism benefits economically disadvantaged students most. They are the population most affected by transportation barriers, housing instability, and family crises that cause chronic absence. More instructional time is producing measurable results. Bluff City's wrap-around supports: on-site nursing, daily attendance intervention, device access, and comprehensive college and career resources, including free ACT preparation and FAFSA assistance, are specifically designed to remove the non-academic barriers that economic disadvantage creates. The 2025 internal gap data confirm these investments are working.

6. **Outline leader and teacher professional development and its impact on student achievement.**

Bluff City's professional development system is one of the most significant drivers of the school's transformation from probationary status to meeting and exceeding standards. The model is layered, continuous, and reaches every level of the organization.

Leadership development is structured around five domains (Instructional Leadership, Culture, Talent Management, Operations, and Professionalism) and supported through monthly professional learning sessions facilitated by IOTA network leadership, focused on instructional leadership, data-driven decision-making, and school culture. Leaders also receive coaching from outside vendors with expertise in urban school leadership, providing an external perspective on instructional practice and organizational improvement. This combination ensures that Bluff City's principal and assistant principals are being developed continuously, not just evaluating others, modeling a culture of professional growth from the top down.

Teacher professional development is equally comprehensive. Summer PD covers curriculum, Tennessee Academic Standards, instructional frameworks, assessment literacy, and special populations support. During the school year, twice-weekly PD sessions are designed in direct response to student and teacher data. When Comprehensive Assessment Program (CAP), Predictive Assessment, or AimsWeb results reveal school-wide gaps, PD is immediately redesigned to address those standards. Weekly Intellectual Preparation time, facilitated by IOTA Curriculum Specialists, engages teachers in lesson internalization, student work analysis, and goal-setting. Wednesday network-wide collaboration brings content teachers across all IOTA schools together by subject area to review disaggregated data and share best practices, with intentional inclusion of SPED and ESL teachers focused on scaffolding. All teachers are evaluated using the TEAM rubric a minimum of three times per semester, with video-recorded observations, real-time coaching, and written action steps in GROW by Level Data system creating ongoing dialogue between instructional practice and student outcomes.

The impact on student achievement is directly traceable to these investments. Between 2022–23 and 2024–25, TVAAS Composite Growth improved from Level 1 to Level 5 in 2024, sustained at Level 4 in 2025, both above the state average and a dramatic turnaround from three consecutive years at Level 1. Math proficiency grew from 1.4% to 9.0%, and Algebra I proficiency increased from 1.3% to 14.0%, a gain more than double MSCS over the same period. English Learners achieved 21.1% Algebra I proficiency compared to MSCS's 9.2%, earning TVAAS Level 5. Intentional investment in co-teaching professional development produced the most striking subgroup result of 2025-26: Students with Disabilities achieved 32% Met/Exceeded on the Q2 benchmark, the highest rate of any subgroup, after two consecutive years of below-average TVAAS growth. The school advanced from Tier 1 Probationary to Tier 2 “Meeting Standards”. Each of these outcomes has a direct line to specific PD investments: enhanced leader coaching strengthened the instructional feedback loop driving TVAAS growth; TEAM rubric implementation produced the ongoing teacher-leader dialogue behind math proficiency gains; EL students now surpass non-EL peers in HS Math by 9.7 percentage points, representing the strongest subgroup gap closure of the charter term; and focused co-teaching PD is now producing measurable gains for SWD for the first time in school history.

Bluff City's most significant challenge is ensuring that the teachers it develops choose to remain, so that expertise deepens and impacts compounds. For the renewal term, the school commits to competitive compensation, expanded career pathways, enhanced mentorship, and continued reduction of the structural barriers that make retention difficult. The professional development foundation is strong and its results are proven.

7. Explain how the school supports students with disabilities, English Learners, and gifted students.

Bluff City High School is deeply committed to ensuring every student , regardless of disability status, language background, or academic giftedness, receives the individualized support and challenge needed to achieve at high levels and prepare for postsecondary success. The school currently serves students with disabilities (12%), English Learners (19.2%), and gifted students through a comprehensive continuum grounded in five pillars: regulatory compliance, strategic leadership, intentional staffing, high-quality instruction, and a relentless focus on outcomes.

Students with Disabilities

Bluff City's framework for supporting students with disabilities is grounded in early identification, implementation of services in the least restrictive environment (LRE), and co-teaching as the primary service delivery model, in alignment with IDEA. Upon enrollment, the school immediately requests that active IEPs be transferred into TNPulse to ensure continuity of services, accurate service tracking, and adherence to state and federal timelines. For students not previously identified, the school implements Child Find procedures through a structured RTI² Student Support Team process. This multidisciplinary team includes administrators, counselors, general education teachers, ESL specialists, and the school psychologist, reviewing academic, behavioral, and functional data to determine appropriate interventions and initiate evaluations when warranted.

Bluff City maintains a strong inclusion model supported by two inclusion special education teachers and one functional skills teacher with two instructional aides, providing services across general education settings. Daily co-planning time is embedded within the master schedule to ensure that specially designed instruction, accommodations, and modifications outlined in IEPs are consistently implemented with fidelity. Students requiring more intensive support receive services within a functional skills classroom while continuing to access inclusion opportunities as appropriate. Related services, including psychological assessment, speech-language therapy, occupational therapy, and physical therapy, are delivered through a virtual service delivery partnership with TalkPath Live, ensuring consistent access to qualified providers aligned with individualized IEP requirements.

The impact of these investments is now measurable: in Q2 2025-26, Students with Disabilities achieved 32% Met/Exceeded on the combined Math and ELA benchmark, the highest rate of any subgroup in the school, surpassing All Students, English Learners, and Economically Disadvantaged students. TVAAS growth for Students with Disabilities reached Level 3 in 2025, matching the state average for the first time in school history.

Bluff City honestly acknowledges it did not meet the Commission's organizational compliance standards for special education in 2024–25, with gaps driven by leadership transitions and staffing turnover. To close this gap, the school commits to three concrete actions: establishing continuous special education coverage through IOTA network backup; creating a Special Education Master Teacher role to monitor IEP timelines and lead co-planning school-wide; and providing monthly compliance training for all special education staff. Professional learning structures include joint summer professional development for co-teaching partners focused on inclusive instructional practices, as well as monthly special education training addressing IEP development, progress monitoring, service documentation, and compliance expectations.

English Learners

Key leaders and staff

At Bluff City, EL compliance functions as a bridge between legal protections and academic achievement. Systems and processes for EL identification, service delivery, ILP development and implementation, and monitoring are continually evaluated and refined; consistently meeting requirements throughout the entire charter term. Network leaders, the Chief of Academic Advancement and the Director of ESL, are responsible for oversight and work closely with Bluff City's Principal and the Assistant Principal of Instruction (API) who serves as the ESL administrator. Having a designated ESL administrator improves school level communication of all processes, timelines, and rationales related to the systems and processes mentioned above. IOTA's ESL curriculum specialist works directly with ESL teachers, supporting implementation of ELD curriculum, and provides professional development for all teachers in the areas of scaffolding and ELPA standards. Other staff crucial to Bluff's efforts to support ELs is the multilingual Office Manager (OM). Beyond basic administrative duties, the OM plays a specialized role in fostering an inclusive environment and ensuring families can navigate the school system effectively.

Service models and curriculum

Content-Based Instruction (CBI) and sheltered instruction are service models that are delivered through scheduled ELD courses, co-teaching, and pull-out instruction. Data such as current ELPA scores, educational background and length of time enrolled in U.S. schools is initially used by ILP Teams to determine the most appropriate type of service, instructional support and accommodations for each student. All ELs receive between 60 and 120 minutes of direct ESL service per day from a licensed ESL teacher. Ninth and tenth grade ELs with current year ELPA21 scores of 1s or 2s and enrollment in a U.S. school of two years or less are typically scheduled to grade level *ESL Replacement English* courses in which licensed ESL teachers utilize *National Geographic's Cengage LIFT* curriculum. All *Cengage* curricula designed for multilingual learners are aligned with language and academic standards. Most of Bluff City's (Long Term English Learners) LTELs receive co-taught service during English class. ESL and English teachers co-plan and co-deliver instruction from MyPerspective ELA units. Long-term English learners and ELs who have not met expected growth may receive additional services and support in scheduled *ELD* courses.where ESL teachers address language and literacy gaps using Cengage's *Pathways Listening, Speaking and Critical Thinking* or *Reading, Writing and Critical Thinking* units. Dually identified students are provided both the direct ESL and SPED related services to which they are entitled under state and federal law.

Planning quality instruction

When content teachers are engaged in lesson internalization, they are to consider the following questions which promote implementation of ELPA21 standards:

- *How will you address gaps in prerequisite knowledge/skills, including those related to language, needed to access the lesson's content?*
- *How will you ensure that ELs can extract meaning when listening, reading, and viewing content in English?*
- *How will you ensure ELs participate in the exchange of information and ideas, and respond to comments and questions?*
- *How will you foster the language development of ELs during this lesson?*
- *Which embedded access points will you utilize to support ELs throughout the lesson?*
- *What additional scaffolds will be implemented?*

In order for the questions above to be addressed, teachers must know ELs' current language levels in each domain. Bluff City teachers access their *ELLevation* accounts to view ELs' current and successive language level descriptors based on ELPA21 assessment results. Teachers can quickly sort EL students by class period, ELPA domain, ELB status, native language, and or US school enrollment date, making planning for differentiation more efficient. Teachers can also access TN Pulse ILPs which are housed in each EL's *ELLevation* profile to ensure they are implementing appropriate instructional scaffolds and accommodations.

When ESL teachers are preparing instruction with Cengage lessons, they must ensure lesson activities provide opportunities for ELs to participate in the exchange of information and ideas, and respond to comments and questions, and opportunities to extract meaning when listening, reading, and viewing content in English. Independent practice must measure mastery of lesson objective(s) and teachers must determine how feedback is to be provided. A plan for gaps in prerequisite knowledge/skills, including those related to language, that are needed to access the lesson's content, should be evident and opportunities for formative assessment of language identified.

Monitoring Progress

ELLevation is also key to Bluff's quarterly ILP progress monitoring process. Electronic monitoring forms for active ELs and students coded as transitional 1 and 2 are created, generated, then sent to teachers' ELLevation accounts. These forms capture key information regarding academic and language progress that ESL teachers use when determining if adequate progress is being made. *ELLevation* provides district and school level completion rate reports making it easy for the Director of ESL and the API to identify teachers in need of support. Academic progress of English Learners is also monitored during content-area professional learning. This is when teachers unpack standards, analyze disaggregated data, and share best practices.

Gifted and Talented Students

Gifted identification begins through the AimsWeb universal screener, with students scoring two or more grade levels above grade flagged for additional screening, psychologist evaluation, and IEP development. IOTA's certified Intellectually Gifted teacher, Margeau Eddington, provides services through differentiated instruction in general education classrooms, inclusion-based support, and pull-out enrichment using the Destination Imagination Curriculum aligned up to three grade levels above grade. Students also access Honors, AP, and SDC courses for college-level rigor, and the Pieces of Learning Social Emotional Workbook Series addresses the unique social-emotional needs of advanced learners. The gifted program ensures that high-performing students are not left unchallenged while the school focuses on closing achievement gaps, a critical equity commitment in both directions.

Through this continuum, Bluff City ensures every student receives both the support and the challenge necessary to reach their full potential.

8. Discuss areas of academic concern and changes made to address any deficiencies.

Areas of Academic Concern and Changes Made to Address Deficiencies

Bluff City High School was placed on probationary status beginning in 2021-22 for continued failure to meet performance targets, and on Tier 2 Notice of Deficiency for 2024-25. The school's response was not superficial adjustment; it was comprehensive, systemic, and data-driven. The result: Commission

Academic Rating advanced to Meets Standard, Mission-Specific Goals to Exceeds Standard, and TVAAS composite improved from Level 1 to Level 5 in 2024, sustained at Level 4 in 2025.

History of Authorizer Intervention

Bluff City received notices of concern from the Tennessee State Board of Education for academic and financial performance in the school year 2017-18, 2018-19, and 2019-20. Following the school's transition to the Tennessee Public Charter School Commission in 2021-22, the five-year interim review found BCHS off track and placed the school on Tier 3 Probationary Status for continued failure to meet performance targets. The school remained on Tier 3 through 2023-24 before being moved to Tier 2 Notice of Deficiency in 2024-25, reflecting measurable improvement. As of 2025-26, the school remains on Tier 2 intervention. The school has engaged each level of intervention transparently and consistently by participating in bi-monthly check-ins with Commission staff, implementing comprehensive corrective action plans, and producing the measurable results documented throughout this application. The movement from Tier 3 to Tier 2 is not the conclusion of this work, but it provides clear and measurable evidence that the corrective action process is effective and produces sustained improvement, positioning the school for continued progress. The renewal term provides the opportunity to fully realize and sustain that progress

Areas of Concern Identified

Academic deficiencies fell into three primary categories. First, absolute proficiency rates were critically low, math proficiency at 1.4%, Algebra I at 1.3%, and science earning a Falls Far Below Standard rating driven by curriculum misalignment, insufficient instructional emphasis, and limited inquiry-based learning. Second, subgroup performance gaps persisted across Students with Disabilities, economically disadvantaged students, and BHN students. Third, operational deficiencies compounded academic challenges across teacher retention, attendance, credentialing, student retention, and special education compliance, each rated Does Not Meet Standard or below.

Root cause analysis identified four core drivers: curriculum not fully aligned to Tennessee Academic Standards; insufficient depth in principal instructional coaching; professional development that was informational rather than practice-based; and a national teacher shortage exacerbated by limited career pathways and support systems, compounded by the academic disruptions of the COVID-19 pandemic.

Changes Implemented

Curriculum Alignment: Bluff City adopted state-recommended instructional materials, including MyPerspectives for ELA and a new standards-aligned math curriculum, supported by IOTA Curriculum Specialists who develop pacing guides, common assessments, and teacher coaching to ensure TNReady alignment. A science curriculum pilot using state-approved materials is currently underway. Early outcomes reflect meaningful academic gains, with math proficiency increasing from 1.4% to 9.0% and Algebra I proficiency rising from 1.3% to 14.0%, more than doubling the growth observed in MSCS over the same period

Intensive Leader Development: Monthly full-day principal collaboration sessions now include co-observations and real-time coaching during live lessons, a shift from information sharing to

practice, reflection, and more practice. Weekly coaching from the Chief of Academic Advancement and twice-yearly formal TEAM evaluations ensure principals are being developed, not just evaluating others. Due to these interventions and support, TVAAS composite improved from Level 1 to Level 5 in 2024, validating strengthened instructional leadership.

TEAM Rubric for Teacher Evaluation: Adoption of Tennessee's TEAM rubric established clear, shared expectations for instructional excellence. Observations are video-recorded, uploaded to GROW by Level Data system, and include real-time coaching and written action steps, creating ongoing dialogue between classroom practice and student outcomes. The impact shows 86% staff satisfaction; a direct correlation between TEAM implementation and math proficiency gains.

Tiered Coaching: Tiered coaching provides differentiated support for teachers based on qualitative and quantitative data, including accountability measures, lesson planning, attendance, instructional execution, and student outcomes. Teachers are placed in Tier 1–3, with coaching intensity increasing by tier to ensure targeted growth. Tier 1 teachers receive bi-weekly observation and coaching, Tier 2 teachers receive weekly support, and Tier 3 teachers receive intensive coaching and walkthroughs twice weekly. This model allows leadership to strategically focus time and resources on teachers who need the most support while promoting continuous improvement for all. Coaching sessions, feedback, and action steps are all housed in the GROW by Level Data system.

Wednesday Network-Wide Collaboration: Weekly content-area professional learning across all IOTA schools enables teachers to unpack standards, analyze disaggregated data, and share best practices with SPED and ESL teachers intentionally included to build scaffolding capacity for all learners. The impact of these interventions are clear. English Learners achieved 21.1% math proficiency compared to MSCS's 9.2%, earning TVAAS Level 5 and an Exceeds Standard Commission rating.

Enhanced RTI² and Intervention Systems: Double-blocked ELA and Math (70 minutes), a dedicated 45-minute daily Advisory intervention block, and data team cycles every 4.5 weeks ensure struggling students receive targeted, tiered support. Tier 2 and 3 students receive weekly AimsWeb progress monitoring with fluid movement between tiers based on data. Every grade level increased Tier I enrollment; students averaging above 100% of stretch growth goal in math.

Teacher Retention and Support: Competitive compensation including stipends and performance bonuses, ten days of summer PD, 120 minutes of weekly instructional planning, career advancement pathways, and a recognition culture directly addressed the retention crisis. This impact is reflected in 86% staff satisfaction, with nearly half of IOTA administrators having started as classroom teachers, providing a visible and credible career pathway.

Performance Indicator	Probationary Period (2022-23)	Current Status (2024-25)	Improvement
Commission Academic Rating	Below Standard	MEETS STANDARD	✓ **ACHIEVED**

Mission-Specific Goal	Not Meeting	EXCEEDS STANDARD	✓ **EXCEEDED**
TVAAS Composite	Level 1	Level 5 (2024), Level 4 (2025)	✓ **IMPROVED**
Math Proficiency	1.4%	9.0%	**+7.6 percentage points**
Algebra I Proficiency	1.3%	14.0%	**+12.7 percentage points**
EL Math Performance	Below District	21.1% (District 9.2%)	**EXCEEDS**
EL ELA Performance	Below District	Commission: Meets	✓ **ACHIEVED**
Economically Disadvantaged	TVAAS Level 3	TVAAS Level 4	✓ **IMPROVED**
Students with Disabilities	TVAAS Level 2	TVAAS Level 3	✓ **IMPROVED**
Chronic Absenteeism	66.3% (2022-2023)	26.7% YTD (2025-2026)	**-39.6 percentage points**
Staff Satisfaction	Concerns noted	86%	✓ **HIGH**

Perhaps most significantly, every tracked student subgroup met or exceeded the state TVAAS average for the first time in school history in 2025, the clearest possible evidence that the school's instructional model is producing equitable growth across all populations, not just those closest to proficiency.

Remaining Areas of Focus

While the improvement trajectory is clear and compelling, Bluff City's leadership maintains honest self-assessment about the work that remains.

Science remains the school's most significant academic gap, rated Falls Far Below Standard at 5.8% proficiency. The renewal term plan includes completing the state-approved curriculum pilot, science-specific summer and ongoing PD focused on inquiry-based instruction, robust science CAP interim assessments, and the establishment of Wednesday science collaboration across the IOTA network. Current-year Q3 benchmark data shows Biology at 22.9% Met/Exceeded, surpassing Double AMO, providing early evidence that the curriculum pilot is producing results.

Students with Disabilities have shown meaningful growth, TVAAS improved from Level 2 to Level 3, reaching the state average for the first time, but absolute proficiency remains below standard. The renewal term goal is to sustain TVAAS at or above the state average, achieve non-zero proficiency results in all tested subjects within two years, and reduce the HS Math and HS English proficiency

gaps by 50% by end of term.Renewal commitments include enhanced co-teaching training, data-driven differentiation, consistent compliance checks and training to monitor IEP timelines and remove compliance burden from instructional staff, and expanded transition and pre-employment services.

Chronic Absenteeism and Attendance, while showing the most dramatic single-year improvement in school history, a 29.1 percentage point drop year-to-date in 2025–26, remain a focus through sustained SART processes, barrier removal partnerships (LifeDoc, Mid-South Food Bank, transportation), and weekly data monitoring through Google Looker and PowerSchool.

Teacher retention, still rated Falls Far Below Standard, is being addressed through competitive compensation, robust PD systems, expanded teacher leadership opportunities, enhanced new teacher mentoring, systematic exit interview analysis, and periodic staff surveys to guide continuous improvement.

Bluff City's trajectory from probationary status to meeting and exceeding standards demonstrates the capacity for organizational learning and responsive leadership that charter renewal requires. The remaining challenges are not failures, but opportunities for reflective continuous improvement at the organizational and school level.

Explain why the school’s academic outcomes merit renewal of its charter agreement.

Bluff City enters this renewal process designated off track by the Commission's criteria, a designation the school accepts with full transparency. The academic and operational record presented in this application makes the case that the trajectory of the past two years, and the current year data already reflecting continued acceleration, represents the kind of sustained, measurable improvement that warrants renewal.

Bluff City serves a uniquely challenged student population: over 95% Black, Hispanic, or Native American; 48% economically disadvantaged; 19.2% English Learners; and 14% Students with Disabilities. The case for renewal rests on five pillars: exceptional student growth, proficiency gains outpacing district and state, achievement gap closure, college and career readiness transformation, and a proven capacity for organizational improvement.

1. Exceptional & Sustained Student Growth (TVAAS)

Bluff City's official TVAAS Schoolwide Composite, the Commission's primary growth metric, improved from Level 1 in each of 2021, 2022, and 2023 to Level 5 in 2024, sustained at Level 4 in 2025. Both results exceed the state average of Level 3 and represent the most dramatic multi-year growth turnaround of any school in the IOTA network. This is not a one-year anomaly, it is two consecutive years of above-average growth following three years of below-average performance, validating that the instructional improvements implemented during the corrective action period have fundamentally changed the school's trajectory.

Subgroup growth is measured through the Literacy and Numeracy TVAAS composite, the metric available at the subgroup level. In 2025, every tracked subgroup met or exceeded the state average for the first time in school history:

Student Group	2023	2024	2025	Status

All Students	3	5	**5**	**★ Highest Possible**
English Learners	3	3	**5**	**★ Highest Possible**
Economically Disadvantaged	3	5	**4**	**Above Average**
Students with Disabilities	2	2	**3**	**Improved — At State Avg**

Note: TN State Average is Level 3 in all years.

2. Proficiency Gains Outpacing District and State

Course	BCHS 2023	BCHS 2025	BCHS Gain	MSCS Gain	TN Gain
Algebra I	1.3%	**14.0%**	**+12.7 pts**	+5.6 pts	+6.2 pts
Overall Math	1.4%	**9.0%**	**+7.6 pts**	—	—
English II (peak: 2024)	23.0%	28.0%*	+5.0 pts	+1.1 pts (2024)	+1.2 pts (2024)

** English II peaked at 38.0% in 2024 (+15 pts that year, 12x the district gain). The 2025 decline is an acknowledged priority for the renewal term.*

Algebra I growth of +12.7 points from 2023–2025 is more than double both MSCS (+5.6) and the state (+6.2) over the same period. Within-year AimsWeb math data shows students growing at 327% of the national growth goal, the strongest single-year internal growth result in school history.

3. Achievement Gap- ELs Surpassing Non-EL Peers in Math

Bluff City's English Learners now surpass their non-EL peers in HS Math by 9.7 percentage points, the widest positive margin in school history. While absolute proficiency levels remain low for all students, EL students are making greater academic progress in mathematics than their non-EL peers despite the additional challenge of simultaneously acquiring English, a result that has strengthened consistently over the past two years, earning an Exceeds Standard Commission rating and TVAAS Level 5. English II remains an acknowledged area of focus, with the school's renewal term commitments specifically designed to accelerate ELA gap closure while sustaining the math gains already achieved.

Equally striking is the internal economically disadvantaged achievement gap. In 2025, ED students at Bluff City surpassed non-ED peers in HS Math by +3.2 percentage points and trail by just -0.9 points in HS English, near parity. In a school where 48% of students are economically disadvantaged, the near-complete closure of the internal poverty-based achievement gap is among the most powerful renewal arguments in this application. In a school where 48% of students are economically disadvantaged, the elimination of the internal poverty-based achievement gap is among the most powerful renewal arguments in this application.

4. College and Career Readiness Transformation

Bluff City's college and career readiness trajectory represents a fundamental shift in student outcomes. The Ready Graduate rate climbed from 8.9% in 2021 to 52.3% in 2024, surpassing MSCS (47.7%) for the first time in school history and coming within 0.8 points of the state (53.1%). The College and Career Ready rate, now the state's primary accountability metric, stands at 66.7% in 2024 and 61.0% in 2025, two consecutive years above 60% on the federal measure. Family satisfaction reached 91.4% in 2024-25, up from 57.1% in 2021-22, reflecting growing community confidence in the school's trajectory.

5. Proven Capacity for Improvement and a Compelling Leading Indicator

The Corrective Action Process (CAP) process produced measurable transformation, from Tier 1 Probationary to Meeting and Exceeding Standards, validating the school's capacity to identify challenges, act, and improve. Perhaps the most compelling renewal argument is not historical but current. Chronic absenteeism has dropped from 66.3% in 2022-23 to 26.7% year-to-date in 2025-26, nearly a 50% reduction and the single largest year-over-year improvement in school history. With attendance reaching 90.5% for the first time since before COVID, students are receiving meaningfully more instructional time than in any recent prior year. Research consistently shows that chronic absenteeism is among the strongest suppressors of academic achievement. That ceiling is being removed in real time, and the Q2 and Q3 benchmark data already reflect the impact. The Commission should expect spring 2026 TNReady results as well.

Bluff City's TVAAS trajectory from Level 1 to Level 5, proficiency gains outpacing district and state, full reversal of the English Learner and economically disadvantaged achievement gaps, and two consecutive years above 60% on the federal CCR measure collectively demonstrate that the school has built a proven, effective instructional model serving one of Memphis's highest-need communities. Without renewal, the transition could introduce instability, threatening the momentum and progress students have already achieved. Renewal ensures the continuity needed to sustain growth, accelerate academic achievement, and position students to reach their full potential, making the strides already made just the beginning of their success.

Section II: Operational Stability

1. **Address progress toward meeting the operational goals within the authorizer's performance framework and outlined in the charter agreement, if applicable.**

Over the course of its charter term, Bluff City High School has demonstrated meaningful progress in several operational areas while continuing to work through challenges in others. The following addresses progress across the operational pillar of the Tennessee Public Charter School Commission's School Performance Framework.

Overall Trajectory

BCHS's overall organizational performance has moved from Meets Standard (2021-22), to Does Not Meet (2022-23), back to Meets Standard (2023-24), and to Does Not Meet Standard (2024-25). While this trajectory reflects inconsistency, the school has demonstrated the capacity to meet standard when management attention and resources are properly aligned, a foundation on which IOTA Community Schools continue to build.

Education Program Compliance

Charter Terms compliance has been an area of concern, rated Does Not Meet Standard across all reported years, primarily related to enrollment targets and compliance documentation requirements tied to the school's ongoing corrective action plan. The school has worked with Commission staff through bi-monthly check-ins during its corrective action plan period and remains committed to full resolution. Compliance with general Education Requirements, however, has consistently met standard across all years, demonstrating the school's capacity to fulfill core programmatic obligations.

Student retention showed improvement over the term: after baseline years in 2022-23, the school earned Meets Standard on both overall retention and subgroup retention in 2023-24. Overall retention dipped in 2024-25, though subgroup retention continued to meet standard, suggesting that equitable student support systems are functioning even as overall retention remains a challenge.

Students with Disabilities Rights met the standard for three consecutive years from 2021-22 through 2023-24 before falling to Does Not Meet Standard in 2024-25 due to teacher vacancies. We have demonstrated the ability to meet this standard, and with the addition of the right support, we are confident we can return to full compliance and sustain success moving forward. During this school year, BCHS is actively addressing this area by maintaining certified teachers and deploying the Special Education Program Manager to provide direct oversight of IEP compliance. English Learner Rights has consistently met standard throughout the entire charter term, reflecting a sustained institutional commitment to this population.

Financial Management and Oversight

Financial compliance has been a consistent strength. Both Financial Reporting and Compliance Reporting and adherence to Generally Accepted Accounting Principles have met standard in every annual report across the charter term. This indicates that financial oversight systems have remained sound and reliable across the full period reviewed.

Governance and Reporting

Governance Requirements have met standards across all reviewed years. Reporting Requirements, which did not meet standard in 2021-22, improved to Meets Standard and has remained there, reflecting the school's responsiveness to authorizer feedback and a strengthened compliance culture.

Students and Employees

Attendance has been one of the school's most significant operational challenges, but also the area of its most dramatic and measurable improvement. In 2021-22, 62.4% of BCHS students were chronically absent, a crisis-level figure. The school responded by investing in dedicated student support infrastructure focused specifically on identifying and removing barriers to daily attendance while also fostering a positive student culture that encourages engagement, accountability, and a sense of belonging. In 2024-25, the rate stood at 55.8%, still elevated but reflecting the beginning of a sustained downward trajectory. Year-to-date in 2025-26, chronic absenteeism has dropped to 26.7%, a reduction of nearly 40 percentage points from the 2021-22 baseline and the single largest year-over-year improvement in school history. Simultaneously, the school's attendance rate has reached 90.5%, meeting the 90% attendance goal for the first time since before COVID. BCHS now employs a dedicated Attendance Specialist whose sole focus is monitoring attendance patterns, conducting outreach to students and families, and coordinating wraparound support through LifeDoc Health and Mid-South Food Bank partnerships to keep students in school.

The suspension rate has followed a parallel trajectory, dropping from 19.0% in 2024-25 to 9.3% YTD in 2025-26, a 9.7 percentage point reduction driven by restorative practice implementation and restructured discipline protocols. Together, these improvements mean students in 2025-26 are receiving meaningfully more instructional time than in any recent prior year.

Credentialing met standard from 2021-22 through 2023-24, then fell to Does Not Meet Standard in 2024-25. The school is addressing this through enhanced onboarding protocols, closer monitoring of licensure timelines, and providing resources to educators completing licensure requirements. .

Teacher Retention is the most persistently critical operational concern across the charter term, rated Does Not Meet Standard in 2022-23 and Falls Far Below Standard in both 2023-24 and 2024-25. BCHS and IOTA Community Schools have taken concrete steps to address this, including the implementation of teacher retention bonuses designed to reward staff who remain committed to the school and its students. Additional investments in structured mentorship, instructional coaching, and a stronger school culture are underway. Notably, despite the challenge of teacher turnover, the school's TVAAS composite growth scores improved from Level 1 in 2022-23 to Level 5 in 2023-24, the highest possible, and Level 4 in 2024-25. This demonstrates that students are growing academically even under conditions of staffing instability, supported by regular committed educators that are knowledgeable, well-informed, and deeply committed to student success. The school recognizes that sustainable growth requires stability, and the retention bonus structure represents a financial commitment to changing this trajectory in the renewed charter term.

Looking Ahead

BCHS has demonstrated a genuine commitment to improvement through sustained engagement with the Commission's corrective action process, significant investment in student support systems, and consistent financial stewardship. Family satisfaction reached 91.4% in 2024-25, up from 57.1% in 2021-22, reflecting growing community confidence in the school's operational and academic trajectory. The dramatic reduction in chronic absenteeism from 62.4% to 26.7% YTD is perhaps the clearest evidence that when BCHS identifies a problem, builds the right infrastructure, and sustains it over time, it produces real results for students. The primary operational focus areas for the renewed charter term are continued improvement in attendance building on the current infrastructure and dedicated Attendance Specialist; teacher retention and staff stability supported by the retention bonus program and expanded coaching structures; full resolution of credentialing and Students with Disabilities Rights deficiencies; and sustained Charter Terms compliance. Specific compliance steps include monthly IEP timeline audits, enhanced onboarding protocols with credentialing verification checkpoints, and quarterly compliance reviews conducted jointly by the Principal and IOTA network leadership. BCHS and IOTA Community Schools enter the renewal period with a clear-eyed understanding of these priorities and a demonstrated capacity to deliver on them.

2. **Provide the student enrollment over the course of the current charter term and discuss if the school is operating at maximum capacity. If the school is under the current approved maximum enrollment in the charter agreement, provide an explanation as to why. Provide any current waitlist information.**

Bluff City High School opened in 2017-18 and is currently in year nine of its ten-year charter term. The table below reflects enrollment across the full charter term:

School Year	Enrollment	School Year	Enrollment

2017-2018	156	2022-2023	494
2018-2019	305	2023-2024	478
2019-2020	416	2024-2025	514
2020-2021	565	2025-2026	440
2021-2022	500		

Enrollment grew steadily during the school's build-out phase as each grade level came online, reaching its peak of 565 students in 2020-21, the first year the school operated at full four-grade capacity. The approved maximum enrollment under the charter agreement is 616 students, and BCHS has not reached that threshold during the charter term.

Following the peak in 2020-21, enrollment declined modestly through 2023-24, reflecting the disruptions of the COVID-19 pandemic on student mobility and family decision-making across the Memphis area, as well as the reputational impact of the school's probationary status during that period. Enrollment rebounded to 514 in 2024-25 before declining to 440 in the current 2025-26 school year. The school acknowledges this decline directly; it coincided with a leadership transition that created temporary uncertainty in community outreach and family recruitment during a critical enrollment period. The school does not currently maintain a waitlist.

It is worth noting that the conditions driving this decline are being actively addressed. Family satisfaction reached 91.4% in 2024-25, up from 57.1% in 2021-22, providing a strong foundation for word of mouth enrollment recovery as the school's academic improvements become more widely known in the community. New leadership is now in place and fully engaged in rebuilding enrollment toward approved capacity. BCHS is actively working to strengthen enrollment heading into the renewal term through structured shadowing experiences, increased marketing, community partnerships, and its lottery for the 2026-27 school year, with the draw scheduled for April 24, 2026. These outreach efforts reflect the school's confidence in the academic and programmatic improvements made in recent years and its commitment to ensuring every available seat serves a student who needs what Bluff City offers.

3. **Describe trends in student attrition rates and how leaders have addressed any concerns in attrition.**

The table below reflects the percentage of beginning-of-year students who withdrew before end of year across the charter term:

School Year	Attrition	School Year	Attrition
2017-2018	20.2%	2021-2022	20.3%
2018-2019	15.8%	2022-2023	22.9%
2019-2020	13.0%	2023-2024	16.6%
2020-2021	8.5%	2024-2025	18.6%

Attrition improved steadily during the school's early years, declining from 20.2% in 2017–18 to a low of 8.5% in 2020–21 as the school matured and its culture and programming strengthened. Beginning in

2021–22, attrition increased significantly, peaking at 22.9% in 2022–23, coinciding with broader disruptions to student mobility across Memphis in the aftermath of COVID-19, compounded by the reputational impact of the school's probationary status. Attrition improved meaningfully in 2023–24, dropping to 16.6%, before increasing modestly to 18.6% in 2024–25, a year that also included a leadership transition that temporarily disrupted the consistency of family engagement and retention efforts.

BCHS leadership has addressed attrition through a comprehensive, multi-layered approach grounded in strong collaboration between the administrative team and the Attendance Team. This close partnership allows for proactive monitoring of student engagement and consistent communication with families. The school's dedicated Attendance Specialist plays a central role not only in reducing chronic absenteeism but also in identifying students who may be at risk of withdrawing, enabling leadership to intervene early and provide targeted support before a withdrawal occurs.

When a family initiates a withdrawal, the school conducts exit interviews to better understand the factors influencing the decision. These conversations provide leadership with actionable data used to identify trends and address systemic concerns. Re-enrollment outreach is conducted with families of students who have withdrawn or disengaged, while ongoing grade-level counseling check-ins serve as regular touchpoints to identify students experiencing academic, social, or emotional challenges. Counselors further support retention efforts by connecting students and families with wraparound community resources that address barriers beyond the classroom.

While attrition remains an area of continued focus, the improvement from the 22.9% peak in 2022–23 to the 16.6%–18.6% range over the past two years reflects the positive impact of these coordinated strategies. Critically, chronic absenteeism and attrition are directly linked, chronically absent students represent the highest withdrawal risk, and the 29.1 percentage point drop in chronic absenteeism year-to-date in 2025–26 is the strongest available leading indicator that attrition will continue its downward trajectory. BCHS remains committed to strengthening these systems during the renewed charter term, with the goal of returning attrition rates to the single-digit and low double-digit levels demonstrated during the school's early years.

4. **Explain how the school provides a safe environment and addresses the physical, social, emotional, and health needs of students.**

Bluff City High School maintains a comprehensive and proactive approach to physical safety through controlled building access, school-wide surveillance systems, administrative presence during transitions, and regular emergency drills covering fire, severe weather, lockdown, and medical situations. All staff are trained in emergency protocols, and a crisis management team ensures rapid, coordinated response to any safety concerns. Students consistently report feeling respected and secure, as validated through bi-annual BESS CORE SEL surveys, reflecting a school culture where safety is not reactive but embedded into daily operations.

The school addresses student health and social-emotional needs through an integrated system of support. Through a partnership with LifeDoc Health, a full-time licensed nurse is on-site daily providing acute care, chronic condition management, preventive screenings, and family health referrals, removing health as a barrier to attendance and learning. Social-emotional development is woven into the school day through a daily Advisory program structured around four pillars: school culture and safety, academics, social life skills, and civic engagement. Each student remains with the same Advisory teacher throughout the year, creating the stable, trust-based mentoring relationships that are foundational to student wellbeing. Mental health needs are addressed through a full-time counselor, school psychologist, and a partnership with TalkPath therapy, supported by community referral partnerships for students requiring more intensive clinical care.

Bluff City's positive behavioral system, RTI²-B, provides tiered support for 100% of students through school-wide expectations, targeted interventions, and individualized behavior plans, while restorative practices ensure that discipline focuses on accountability and growth rather than exclusion. The school's commitment to restorative practice is measurable: the suspension rate dropped from 19.0% in 2024-25 to 9.3% YTD in 2025-26, a 9.7 percentage point reduction, meaning significantly more students are remaining in school and in learning rather than being excluded.The school's 21st Century Community Learning Centers grant funds a robust after-school program offering academic tutoring and enrichment activities, and community partnerships with the Mid-South Food Bank address food insecurity and specialized health needs that extend beyond the school's walls. The 29.1 percentage point drop in chronic absenteeism year-to-date in 2025-26, the clearest possible behavioral indicator of a school culture that is working, reflects not just improved attendance protocols, but a school environment where students feel safe, supported, and connected enough to show up consistently..

Guided by the school's shared commitment, One Belief, One Bluff, every system and partnership is designed to ensure that no student's physical, social, emotional, or health need goes unmet.

5. **Explain how the school has made community connections and developed working relationships with parents and families. Provide letters of support from the community for the renewal of the charter agreement as an attachment to this application.**

At Bluff City High School, family engagement is not an event, it is our culture. The school has intentionally built deep, authentic relationships with parents, families, and the broader community that are foundational to its mission and directly tied to student success.

Family communication is multi-layered and accessible to all. Bluff City's administrative team serves as the primary point of contact for families, providing consistent availability and responsive communication to address family needs. All communications are provided in families' home languages, with certified translators present at events and multilingual staff available daily, ensuring full access for the school's English Learner population. Families receive monthly newsletters in their home language, real-time access to student progress through PowerSchool, quarterly report cards, and mid-quarter progress reports. Urgent communications are delivered through robocalls, text, and email, The school also maintains an active presence on Facebook and Instagram.

Formal engagement opportunities are plentiful and designed to accommodate working families. Back to School Night, quarterly parent-teacher conferences, monthly parent meetings, and town hall forums create consistent touchpoints throughout the year. The principal holds open-door office hours every Tuesday through Mornings with Mrs. Davis, and monthly P.A.C.K. (Parents and Community for Kids) meetings provide stakeholders with transparent State of the School updates, including data, progress toward goals, and opportunities for direct involvement. Parent workshops cover topics ranging from college planning and financial aid to adolescent development, and cultural events celebrate the diversity and pride of the school community.

Family voice is formally integrated into the school decision making process. Prior to the 2025-26 school year, the School Advisory Council advised the IOTA Board on school-specific matters. After considering recommendations from the Commission, a parent from Bluff City and a parent from Wooddale have been added to the IOTA Board of Directors. Adding these important voices to the governing board and continuing the efforts of the School Advisory Team, Bluff City consistently offers a warm environment, with personalized care, and strong community connections as defining strengths. Board meetings are open to the public with minutes available, ensuring full transparency in academic, financial, and operational decisions. Parent advocates may submit input on school initiatives at any time during the meetings, as well as via email or scheduled meetings with administrators.

Bluff City has also cultivated strategic community partnerships that provide wraparound services and remove barriers to learning. LifeDoc Health provides an on-site full-time nurse and no-cost medical screenings. The University of Memphis supports dual enrollment and postsecondary readiness. Code Crew has delivered coding and STEM instruction, while the Greater Memphis Chamber provides career readiness training and internship opportunities for teachers and students. The City of Memphis Youth Services, Tennessee Valley Authority, and the 21st Century CLC Grant fund after-school programming, academic tutoring, and enrichment activities that extend learning well beyond the school day. A partnership with Transformation Consulting Group, a mental health agency, provides referral support for students and families needing long-term services.

The strength of these relationships is measurable. Annual family satisfaction surveys reflect a dramatic improvement, from 57.1% in 2021-22 to 91.4% in 2024-25, representing one of the most significant cultural transformations of the charter term and demonstrating that families are not just enrolled at Bluff City, they are invested in it. This is further reflected in the school's reputation: siblings continue to enroll year after year, families who have left often choose to return, and word of mouth has become Bluff City's most powerful recruitment tool. This is a school the community not only values, it actively recommends. Letters of community support are included as an attachment to this application.

6. **Explain how the school sustains a well-functioning organizational structure that provides for personnel stability and effective teacher retention.**

Organizational Structure, Personnel Stability, and Teacher Retention

Bluff City High School operates within a well-functioning organizational structure supported by IOTA Community Schools, a CMO that provides comprehensive services across 12 areas including curriculum, special education, EL support, finance, operations, technology, and talent management. This network ensures Bluff City is never operating in isolation, when individual teachers leave, IOTA's centralized recruitment and HR systems enable rapid replacement, and when leadership transitions occur, continuity is protected by promotion from within the network. The appointment of Principal Katie Davis for 2024–26, an experienced IOTA leader, exemplifies this stability in practice.

At the school level, three Assistant Principals support instruction, culture, and operations, while Department Chairs and Team Leaders provide an additional layer of teacher leadership, PLC facilitation, and new teacher mentoring. Principal Davis receives weekly coaching from the Chief of Academic Advancement and participates in monthly network-wide principal collaboration, ensuring consistent instructional leadership and professional growth.

Bluff City honestly acknowledges that teacher retention is a significant operational challenge, rated Falls Far Below Standard in the 2024–25 Operational Performance Framework. The school does not minimize this concern. However, IOTA has responded with a comprehensive, research-based retention strategy addressing compensation, culture, support, and career growth simultaneously. Salaries are competitive with most charter schools in Memphis, with performance bonuses, stipends for leadership roles, and annual raises. The retention bonus structure represents a meaningful and sustained financial commitment, not a one-time intervention, with bonuses tied directly to continued employment at the school. Teachers receive ten days of paid professional development before the school year, twice-weekly PD during the year, and 120 minutes of weekly Instructional Planning time with coaches. Instructional coaches and administrators provide regular classroom observations and feedback, and new teachers are paired with veteran mentors for weekly check-ins and practical guidance.

Though Bluff's current enrollment is below the charter term goal, Bluff City's small school environment, approximately 440 students with a target 22:1 student-teacher ratio, means teachers know their students well and carry manageable planning and grading loads. A deliberate culture of appreciation includes quarterly teacher recognition, public celebrations, board recognition, and leadership that actively solicits and values teacher voice. Notably, 50% of IOTA administrators began as classroom teachers, including Principal Davis herself, signaling a clear and credible pathway to advancement. Current data reflects early progress: 86% of teachers report satisfaction with their work environment and feel valued and supported by leadership.

Most tellingly, the school achieved TVAAS Level 5 in 2024 and Level 4 in 2025, both above the state average, during the same period teacher retention was rated Falls Far Below Standard, demonstrating that the instructional systems and coaching structures are strong enough to produce exceptional student growth even under conditions of staffing instability. This is not an argument for accepting high turnover, it is evidence that the foundation being built is sound, and that stabilizing the teaching staff through the renewal term's retention investments will translate directly into accelerating the academic gains already underway.

Throughout the renewal term, Bluff City commits to sustaining these efforts, maintaining competitive compensation, protecting high-quality PD, expanding teacher leadership roles, systematically analyzing exit interview data to refine interventions, and reporting retention metrics transparently to the Board on a monthly basis. The school has both the honest self-awareness to name this challenge and the organizational infrastructure to address it.

7. Describe the development of the governing body members and school leadership during the current charter term. List the current board members and their tenure on the board.

Bluff City High School is governed by the IOTA Community Schools Board of Directors, an independent governing board that provides external accountability, internal oversight, and mission-aligned leadership. The Board has demonstrated capacity for effective governance throughout the charter term, navigating the school from probationary status to Tier 2 Notice of Deficiency status while maintaining compliance and supporting accelerating academic progress.

Board Member	Position	Organization	Expertise	Tenure
Amertice Allen	Board Chair	ALSAC/St. Jude Children's Research Hospital	Operations	Dec 31, 2021-Present
Pam Egwuekwe	Board Secretary	Code Crew	Academics	Dec 31, 2021-Present
Pedro Velasquez	Board Member	Lifedoc Health	Community Engagement	Apr 27, 2023-Present
Tamika Young	Board Member	Nike North America & Converse Distribution Centers	Human Resources	Apr 27, 2023-Present
Larry Neal, Jr.	Board Member	Simmons Bank	Finance	Sep 26, 2024-Present

Eiko C. Harris	Board Member	Cordell & Cordell, P.C.	Legal	Aug 01, 2025 -Present
Katherine Gwin	Parent Advisory Council	Bluff City High School	Community Engagement	Aug 01, 2025 -Present
Shaqueria Greer	Parent Advisory Council	Wooddale Middle School	Community Engagement	Aug 01, 2025 -Present

Board Development

The IOTA Board of Directors has demonstrated a sustained and structured commitment to governance development throughout the current charter term. In full compliance with TCA §49-13-111(q), IOTA registered through the Tennessee Charter School Center to utilize the Board on Track platform for trustee training and certification, supplementing required training with network learning alongside other charter boards and ongoing engagement with governance best practices. Rather than treating compliance as a ceiling, IOTA has used it as a foundation for continuous board development. The board's annual retreat serves as a dedicated moment of structured self-reflection, during which members assess stakeholder representation, member selection and orientation, organizational health, board operations, the board's relationship with school leadership, and progress toward annual goals. This intentional cycle of reflection and recalibration ensures the board remains responsive, mission-aligned, and operationally strong.

The board has focused strategically on recruiting members who deepen the expertise available to the school. Through active partnerships with New Memphis and the Memphis Business Chamber, IOTA has pursued targeted recruitment of individuals with expertise in compliance, legal affairs, and fundraising. Most recently, IOTA welcomed Eiko Harris, attorney at Cordell & Cordell P.C., whose legal expertise brings critical additional capacity to support sound governance oversight and compliance decision-making.

Board and School Leadership Through Challenges and Growth

The Bluff City Board of Directors has provided exemplary governance during a period of significant challenge and transformation, successfully navigating the school from Tier 3 Probationary Status to Tier 2 Notice of Deficiency in 2024-25. The Board supported the implementation of a comprehensive corrective action plan that improved all operational areas to Meets Standard while simultaneously maintaining and accelerating academic progress, culminating in TVAAS Level 5 in 2024, sustained at Level 4 in 2025, and a 7.6 percentage point increase in math proficiency. Family satisfaction reached 91.4% in 2024-25, up from 57.1% in 2021-22, a direct reflection of the Board's strategic investments in school culture, student support, and instructional quality.

Perhaps the most significant governance achievement of the charter term was the Board's expert management of the organizational transition from Green Dot Public Schools Tennessee to IOTA Community Schools in July 2024. Executing a full CMO transition while maintaining academic momentum, preserving the local independent board structure, ensuring governance continuity, and sustaining the corrective action plan simultaneously represents a level of organizational leadership that directly enabled, rather than disrupted, the school's improvement trajectory. Throughout the charter term, the Board has provided strategic leadership during multiple critical junctures: hiring and supporting Executive Director Jocquell Rodgers, overseeing principal transitions including the appointment of Katie Davis for 2024-26, approving strategic plans to address attendance and teacher

retention challenges, navigating facility negotiations for continued occupancy at 4100 Ross Road, and providing stability through COVID-19 pandemic disruptions.

School Leadership Development

Throughout the current charter term, school leadership has made meaningful strides in professional growth and development. The Chief of Academic Advancement meets regularly with teachers and school leadership to support instructional alignment, ensuring growth is happening at every level of the organization. Network principals gather monthly for full-day collaborative sessions including co-observing classrooms and providing real-time instructional coaching, a shift toward practice and reflection that has deepened principals' ability to drive student learning. School leadership has made a direct and intentional focus on culture and data, recognizing that a strong school environment and data-driven decision-making are foundational to sustained academic improvement. This focus on data was particularly evident in the school's response to chronic absenteeism, a close examination of attendance trends led directly to the implementation of SART, producing the single largest year-over-year attendance improvement in school history. All school leaders are formally evaluated using the state-approved TEAM Rubric for Administrators, measuring performance across instructional leadership, culture, talent management, operations, and professionalism, with mid-year and end-of-year evaluations providing structured checkpoints for growth. In 2024, Katie Davis, former Assistant Principal of Hillcrest High School, transitioned into the role of Principal at Bluff City, where she has emphasized positive school culture as a pathway to academic success and teacher retention.

8. **Describe the school's current facility and if the school anticipates any facility changes in a new charter term.**

Bluff City will maintain an adequate facility that meets educational needs, complies with all requirements, and remains accessible to families throughout the renewal term.

Bluff City High School is located at 4100 Ross Road in Memphis, TN 38115, within the Hickory Hill community, occupying a facility of approximately 74,000 square feet designed to fully support the school's educational mission. The building features 30 academic classrooms ranging from 750–950 square feet each, complemented by specialized spaces including music and arts rooms, CTE spaces, small group intervention rooms, advisory classrooms, and a modified Functional Skills instructional space with a kitchen. Common areas include a cafeteria, gymnasium (located 500 yards from the main campus property, with structured transition protocols managing safe movement during the school day), outdoor gathering space, main and administrative offices, counseling and nurse offices, teacher work rooms, and student common areas, while support spaces such as storage rooms, copy and work rooms, IT infrastructure, and restrooms are distributed throughout the building to ensure smooth day-to-day operations.

IOTA Community Schools is in the 9th year of a 30-year lease with two 10-year extensions, exercisable solely at the discretion of IOTA, for the property at 4100 Ross Road. Further, IOTA has retired all of the approximately $7.2 million in debt utilized to build and renovate the site. The retirement of this debt represents a significant financial achievement that removes a structural burden from the school's operating budget, freeing resources for direct investment in instruction, compensation, and student support during the renewal term. This level of facility security, a long-term lease, no outstanding debt, and full control over extension options, eliminates one of the most common sources of charter school instability and allows leadership to focus entirely on academic and operational improvement.

Compliance and Safety Standards

Bluff City High School's facility fully meets all required compliance standards across health, safety, and accessibility areas. The building is ADA compliant per TCA §49-13-107, featuring accessible entrances and ramps, and satisfies all Tennessee health and safety requirements including fire safety systems, emergency exits, and adequate lighting and ventilation. The facility maintains a Performance Framework rating of Meets Standard, is kept in good condition through regular inspections and prompt repairs, and ensures secure, FERPA-compliant information handling through locked confidential file cabinets and protected student records systems.

Anticipated Facility Changes

Bluff City does not anticipate any facility changes during the renewal term. The school will continue operating at 4100 Ross Road under its existing 30-year lease with IOTA, with two additional 10-year extensions exercisable solely at IOTA's discretion, providing long-term facility security that eliminates a common source of charter school instability and allows leadership to focus entirely on academic and operational improvement.

9. Explain why the school's operational condition merits renewal of its charter agreement.

Bluff City enters this renewal process with an 'Off Track' designation for organizational performance based on the Commission's criteria. The school's organizational performance over the charter term reflects periods of inconsistency, with ratings of Meets Standard in 2021–22, Does Not Meet in 2022–23, Meets Standard in 2023–24, and Does Not Meet in 2024–25. The school openly recognizes this pattern and is actively working to address it through intentional and sustained improvement efforts.

The 2022-23 "Does Not Meet" designation was driven by attendance and reporting failures that led directly to the implementation of the Student Attendance Review Team (SART). SART is now producing the single largest attendance improvement in school history, a 29.1 percentage point drop year-to-date chronic absenteeism. The 2024-25 "Does Not Meet" was also driven by teacher vacancies affecting special education compliance and credentialing.These are challenges the school is actively addressing through dedicated compliance oversight, enhanced onboarding protocols, and intentional backup systems to ensure continuity in the event of staff transitions.

Our track record also shows a school that has consistently identified the root causes of each deficiency and responded with concrete action. The off-track designation reflects where the school has been and the lessons the school has learned. The renewal term is dedicated to leveraging that knowledge to strengthen internal systems, build capacity, and deliver consistent, high-quality performance across all organizational indicators.

Bluff City High School's operational condition merits renewal because it demonstrates a school that has faced significant challenges with honesty, responded with urgency, and built the organizational infrastructure necessary for sustained improvement. The school's trajectory, from Tier 3 Probationary Status to Tier 2 Notice of Deficiency in 2024-25, reflects the kind of adaptive, mission-driven leadership that warrants continued investment.

Several operational strengths provide a durable foundation for the renewal term. Financial compliance has been a consistent bright spot throughout the charter term, with both Financial Reporting and Generally Accepted Accounting Principles meeting standard in every annual report, demonstrating

that fiscal oversight has remained sound and reliable regardless of the challenges occurring elsewhere in the organization. The school's facility is fully owned debt-free, with IOTA having retired approximately $7.2 million in construction and renovation debt, eliminating a structural financial burden and freeing resources for direct investment in students and staff. Governance Requirements have met standard across all reviewed years, and the Board successfully managed a full CMO transition from Green Dot to IOTA in 2024 without disrupting academic momentum. Family satisfaction reached 91.4% in 2024-25, up from 57.1% in 2021-22, reflecting deep and growing community confidence in the school's direction.

Areas of concern, particularly teacher retention and chronic absenteeism, are not minimized but are being addressed through concrete, sustained strategies. Chronic absenteeism has dropped from 66.3% in 2022-23 to 26.7% year-to-date in 2025-26, nearly a 40 percentage point reduction, through the implementation of SART, barrier-removal partnerships, and a dedicated Attendance Specialist. Teacher retention, still rated Falls Far Below Standard, is being addressed through competitive compensation including sustained retention bonuses, expanded leadership pathways, and a coaching infrastructure strong enough to produce TVAAS Level 5 growth even during periods of staffing instability.

The school operates within the comprehensive support structure of IOTA Community Schools, which provides stability across curriculum, finance, operations, special education, and talent management, ensuring Bluff City is never operating in isolation. It maintains a safe, compliant facility, strong community partnerships, and the organizational self-awareness to name its challenges publicly and address them systematically. That combination, a capable board, experienced CMO, proven improvement capacity, and a school culture anchored in accountability and care, is precisely why Bluff City merits a renewed charter term.

Section III: Financial Health

1. Progress Toward Financial Goals: Address progress toward meeting the financial goals outlined in the authorizer's performance framework and in the charter agreement, if applicable.

Bluff City High School has demonstrated clear progress toward meeting the financial expectations outlined in the Commission's performance framework and charter agreement. Most recently, the school earned an overall "Meets Standard" rating for financial performance in the 2024–2025 school-specific annual report.

This reflects meaningful improvement from earlier in the charter term, when Bluff City did not meet financial standards across several indicators. Prior results were impacted in part by a technical debt default tied to academic performance provisions within a historical loan agreement, rather than underlying financial instability. That loan has since been fully retired, eliminating the conditions that previously affected the school's financial ratings. In addition, Bluff City has strengthened its financial position by improving its cash reserves and improving enrollment forecasts, resulting in a "Meets Standard" rating across key metrics such as liquidity, cash position, debt management, and enrollment variance.

While the school did not meet standard on total margin, this metric reflects the inclusion of a significant one-time principal payment of approximately $3.3 million, which was treated as an expenditure in the framework despite not representing an operating expense. Excluding this

non-operating impact, Bluff City has generated positive net income in each of the past three years, demonstrating underlying financial stability.

Bluff City has also consistently operated in compliance with the financial provisions of its amended charter agreement, including adherence to required accounting practices, timely financial reporting, audit submission, and established oversight expectations.

2. Fiscal Management and Audit History: Report on the fiscal management of the school during the current charter term based on previously submitted audits, including A-133 audits if applicable, and financial reports.

Bluff City has maintained strong fiscal management practices throughout the charter term, as evidenced by consistent audit results and compliance with state and federal requirements. Independent audits for the entire charter term resulted in unmodified (clean) audit opinions, indicating that the financial statements were fairly presented in accordance with generally accepted accounting principles.

Audits further confirmed:

- No material weaknesses in internal control
- No significant deficiencies or material noncompliance
- No findings or questioned costs related to federal programs

At the school level, Bluff City demonstrated improvement in financial position throughout its charter term and clean audit results, validating the school's fiscal management practices.

3. Alignment of Expenditures with Mission and Academic Priorities: Address the alignment between expenditures and the school's mission, plans for student academic growth, and staff professional development.

Bluff City's expenditures are closely aligned with its mission to create sustainable economic pathways through transformative academic programming. Resources have been intentionally directed toward extending instructional time, strengthening intervention supports, and building data-driven instructional systems. The school also prioritizes targeted services for English Learners and students with disabilities, alongside wraparound supports that engage families and address barriers to student success. Ongoing investment in teacher development and professional learning further reinforces the quality of instruction.

These investments directly support the school's college preparatory model and focus on improving student outcomes. Expenditure decisions are also responsive to evolving student needs and performance data. For example, IOTA has increased investment in strategies to address chronic absenteeism, as well as in career exploration and college and career readiness initiatives.

4. Fiscal Challenges and Responses: Review how any significant fiscal challenges were addressed during the current charter term.

Bluff City experienced several fiscal challenges during the charter term, including the phase-out of federal relief funds, periods of enrollment decline, and the fixed costs associated with debt service. These factors placed pressure on the school's budget, particularly as revenues adjusted more quickly than expenses.

In response, the school and the IOTA network made targeted adjustments to better align staffing and spending with enrollment, while also strengthening financial oversight. The organization also prioritized reducing long-term liabilities, ultimately eliminating its outstanding facility debt. As a result, Bluff City improved its financial performance from “Does Not Meet” earlier in the charter term to a “Meets Standard” rating in the most recent evaluation.

5. Financial Soundness and Transparency: Describe efforts to operate the school in a financially sound and transparent manner.

Bluff City operates in a financially sound and transparent manner in alignment with its charter agreement and all applicable laws and regulations. The school maintains consistent financial oversight through regular internal reporting, annual budgeting, and independent external audits. Established internal controls and accounting practices support accurate financial management and safeguard public funds. In addition, the school complies with all required local, state, and federal reporting requirements, ensuring that stakeholders have clear and reliable visibility into its financial performance.

6. Financial Condition and Case for Renewal: Explain why the school’s financial condition merits renewal of its charter agreement.

Bluff City’s financial condition supports the renewal of its charter agreement. The school has maintained a “Meets Standard” financial performance rating (aside from some downward pressure in recent years from the Academic related Debt Default) and has consistently received clean audit opinions with no material findings. Over time, the school has demonstrated improvement across key financial, as well as the ability to adapt its financial practices to evolving operating models and organizational structures. Together, these factors reflect a track record of responsible financial management and the capacity to sustain operations effectively in the years ahead.

Section IV: Future Plans and Projections

1. **Describe the academic plan for a new charter term and clearly outline the academic benchmarks/goals the school will use to track success.**

Bluff City High School has earned the right to make a compelling case for renewal, not through promises, but through proof. In ten years, the school moved from probationary status to meeting academic standards, achieved TVAAS composite growth from Level 1 to Level 5, the highest possible, increased math proficiency by 7.6 percentage points, and produced English Learner math outcomes that now exceed both district and state averages. These results were not accidental. They were the product of deliberate, systems-driven work: rigorous curriculum alignment, intensive teacher development, data-responsive instruction, and comprehensive wraparound supports that remove the non-academic barriers that too often predetermine outcomes for students in underserved communities. The academic plan for the renewed charter term does not ask the Commission to take a leap of faith.It asks the Commission to recognize how far students have come and how fast they are moving and to authorize the continuation of the work that is producing those results.

Academic Vision and Goals for the Renewed Charter Term

By the end of the renewed charter term, Bluff City High School will demonstrate consistent academic excellence through sustained student growth, increased proficiency approaching state averages, eliminated achievement gaps, and 100% of graduates accepted to postsecondary education or career training programs.

Academic Pillars with Measurable Goals

Academic Pillar	End-of-Term Goal (10 years)
Academics	• Maintain TVAAS Level 4 in all tested subjects; • Subgroups will earn a TVAAS Level 3 • Growth 25 Score of 3
ELA Growth	• Increase percentage of students in Tier I in ELA by 15 percentage points from BOY to EOY annually, or increase students scoring On Track/Mastered in ELA by 10 percentage points from prior year TNReady
Math Growth	• Increase percentage of students in Tier I in Math by 15 percentage points from BOY to EOY annually, or increase students scoring On Track/Mastered in Math by 10 percentage points from prior year TNReady
Culture	• Reduce suspensions by 10% each year (all subgroups) • Reduce chronic absenteeism by 10% each year until reaching 20% • Increase ADA by 5% each year until reaching 95% • Increase graduation rate by 10% each year 75% of students graduate College and Career Ready

These pillars are not independent targets, they are mutually reinforcing. Instructional excellence drives growth. Growth drives proficiency. Proficiency eliminates gaps. And the elimination of gaps ensures that every student, regardless of background, walks across the graduation stage ready for what comes next.

Year-by-Year Academic Benchmarks

The following progressive annual benchmarks ensure consistent progress toward end-of-term goals with clear accountability measures each year. These targets are grounded in Bluff City's demonstrated capacity, specifically, 7.6 percentage points of math growth over three years (approximately 2.5pp per year) and sustained TVAAS Level 4 growth across subgroups, and set ambitious but achievable annual targets consistent with that demonstrated rate of improvement.

TVAAS Growth Benchmarks (Annual)

Year	TVAAS Target	Subgroup Target	Accountability Measure
Year 1 (2026-27)	Level 4 in ELA and Math	All subgroups Level 3 or higher	Maintain current Level 4 performance; Establish baseline for Science

Year 2 (2027-28)	Level 4 in all subjects	All subgroups Level 3 or higher	Expand growth to all tested areas; Consistent growth patterns
Year 3 (2028-29)	Level 4-5 composite	All subgroups Level 3 or higher	Movement toward Level 5 in at least one subject
Year 4 (2029-30)	Level 5 in one subject, Level 4 in others	All subgroups Level 3 or higher	Demonstrate exceptional growth in priority area
Year 5 (2030-31)	Level 5 in multiple subjects	All subgroups Level 3 or higher	Sustained high growth across all tested subjects

Note: Schoolwide Composite reflects the full TVAAS composite including all tested subjects. Subgroup targets reflect the Literacy and Numeracy TVAAS composite, the metric available at the subgroup level.

Academic Proficiency Benchmarks (Annual Targets)

Year	ELA Proficiency Target	Math Proficiency Target	Science Proficiency Target
Baseline (2024-25)	16.2%	9.0%	11.5%
Year 1 (2026-27)	26%	19%	21%
Year 2 (2027-28)	36%	29%	31%
Year 3 (2028-29)	46%	39%	41%
Year 4 (2029-30)	56%	49%	51%
Year 5 (2030-31)	66%	59%	61%

Note: *These targets represent 10 percentage points of annual growth, consistent with the school's internal goal framework and supported by subject-specific evidence of accelerating gains, Algebra I grew 6.7pp in a single year, English II grew 15pp in a single year, and the dramatic reduction in chronic absenteeism now provides students with meaningfully more instructional time than in any prior year. The school acknowledges these are aggressive targets and commits to transparent annual reporting to the Board and Commission on progress toward each benchmark.*

Instructional Strategies to Achieve Academic Goals

Bluff City High School's academic plan integrates proven, data-driven instructional systems across every layer of the school day. The curriculum is rigorously aligned with Tennessee Standards in all subjects, with IOTA Curriculum Specialists ensuring vertical alignment, continuous review, and strong implementation support. Student needs are addressed through a three-tier RTI² model using AimsWeb universal screeners three times per year, targeted small group instruction, bi-weekly and weekly progress monitoring, after-school tutoring, and interventions deliberately aligned with classroom instruction. Data drives all instructional decisions: teachers analyze results weekly in grade-level PLCs using formative and quarterly benchmark assessments to identify gaps, adjust instruction, and re-teach as needed, while AimsWeb screeners, TNReady, and EOCs provide a complete picture of student performance. IOTA Curriculum Specialists reinforce this through weekly classroom coaching, model lessons, co-planning, and just-in-time feedback. Teachers are further supported by ten paid summer PD days, twice-weekly professional learning during the school year, Wednesday network coaching sessions, content-specific training, and cross-network best-practice sharing. Extended learning opportunities , including 21st Century CLC-funded after-school tutoring, summer school, Saturday school, and twice-weekly teacher office hours, complement an already

extended school day. A daily Advisory period ensures students track their own growth on Predictive Assessments and AimsWeb, develop SMART goals, and take active ownership of their learning.

Strategies to Eliminate Achievement Gaps

Bluff City has already demonstrated that achievement gaps are not inevitable for its student population. EL students now surpass non-EL peers in HS Math by 9.7 percentage points. The internal HS English gap for EL students, while narrowing from -11.5% in 2023 to -9.6% in 2025, remains an acknowledged area of focus. The renewal term will apply the same intentionality to the subgroups where gaps persist.

Subgroup	Current Status / Goal	Targeted Strategies
English Learners (19.2%)	ELs surpass non-EL peers in HS Math by +9.7pp; HS English gap narrowing (-9.6%); Goal: Sustain math gains; eliminate ELA gap by end of renewal term	ESL specialist; on-going professional development for all content teachers on multilingual learner scaffolding beyond annual compliance training, refined co-planning process for ELA and ESL teachers, ELLevation benchmark assessments to measure language proficiency growth
Students with Disabilities (14%)	TVAAS Level 3 achieved for first time; proficiency near 0% most subjects; Goal: Sustain TVAAS at or above state average; reduce HS Math and HS English proficiency gaps by 50% by end of renewal term, with non-zero proficiency results in all tested subjects within two years	Enhanced co-teaching; specialized instruction; IEP accommodation implementation; assistive technology; inclusion focus (LRE); progress monitoring; individualized interventions
Economically Disadvantaged (48%)	ED students surpass non-ED peers in HS Math (+3.2pp); near parity in HS English (-0.9pp); Goal: Sustain gap closure; ED students grow at or above overall rate	Wraparound services (LifeDoc, Food Bank); enhanced SART protocols; after-school tutoring; technology access; summer programming; trauma-informed practices; expanded mental health and counseling services

Bluff City has already eliminated the internal economically disadvantaged achievement gap in HS Math and nearly closed it in HS English, and EL students now surpass non-EL peers in HS Math. The renewal term applies the same data-driven approach to Students with Disabilities, where TVAAS growth reached the state average for the first time and Q2 2025-26 benchmark results showing SWD at 32% Met/Exceeded, the highest rate of any subgroup, indicate the work is producing results.

College and Career Readiness Benchmarks

A charter school's ultimate measure of success is not just a test score, it is whether students graduate prepared to succeed in the world beyond high school. Bluff City's college and career readiness plan sets ambitious, measurable targets backed by concrete support structures already in place.

Metric	Current/Baseline	End-of-Term Goal
Graduation Rate	76.2% (2025)	90%+ four-year graduation rate
College and Career Ready Rate	61% (2025)	75%+ CCR rate
College Acceptance	High percentage currently	100% of graduates accepted to college or career training
Industry Credentials	CTE pathways available	90%+ students earn industry credential or college credit in high school
ACT Composite Average	14.9 (2025)	17.0+ (closing gap to state average of 18.9)

These goals are supported by comprehensive structures already embedded in Bluff City's program: Advisory focused on college and career planning beginning in 9th grade; academic counselors providing college guidance; college tours and campus visits; FAFSA completion support for all seniors; career exploration through the Be Entrepreneurial partnership; AP course offerings; CTE pathways with industry certifications and mentorship opportunities; ACT preparation integrated into instruction; college application and financial aid workshops; and alumni mentorship connecting current students with graduates

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Assessment Systems and Progress Monitoring

Bluff City's assessment and monitoring systems ensure that every benchmark in this plan is tracked, analyzed, and acted upon at the appropriate organizational level.

Assessment Type	Frequency	Purpose
Universal Screeners (AimsWeb)	3x yearly (Fall, Winter, Spring)	Identify students below grade level; Track growth over time; Inform intervention placement
Formative Assessments	Weekly/per unit	Check for understanding during instruction; Adjust teaching in real-time; Identify misconceptions
Benchmark Assessments (Mastery Connect)	Quarterly	Measure progress toward proficiency; Predict TNReady performance; Adjust curriculum pacing
Progress Monitoring (Tier 2/3)	Weekly/bi-weekly	Track intervention effectiveness; Adjust support intensity; Document RTI response
Summative Assessments (TNReady, EOCs)	Annual	Measure proficiency; Calculate TVAAS growth; Accountability; Program evaluation

Data Review and Action Cycles

Cycle	Process
Weekly (Teacher/PLC Level)	Review formative assessment data; Adjust upcoming lessons; Identify students needing re-teaching; Plan targeted small groups

Quarterly (School Leadership)	Review benchmark data; Evaluate RTI effectiveness; Adjust interventions; Professional development planning based on teacher needs
Three Times Yearly (IOTA/School)	Analyze universal screener data; Identify schoolwide trends; Adjust curriculum emphasis; Resource allocation decisions
Annual (Board/IOTA/School)	Review TNReady/TVAAS results; Evaluate progress toward benchmarks; Strategic planning adjustments; Budget prioritization for academic needs

Bluff City High School's academic plan for the renewed charter term is ambitious yet achievable, building on demonstrated success, TVAAS from Level 1 to Level 5, 7.6 percentage points of math growth, elimination of the internal economically disadvantaged achievement gap, and reversal of the EL math gap, while setting clear, credible targets for continued acceleration. The benchmarks are grounded in demonstrated capacity, not aspiration. The monitoring systems ensure accountability at every level. And the instructional model is already producing results for the students who need it most.

2. **Describe any organizational changes the school anticipates in a new charter term (if applicable) and the intended impact on the school.**

Bluff City High School does not anticipate significant structural organizational changes in the renewed charter term. The school will continue operating under the governance of the IOTA Community Schools Board of Directors, with Principal Katie Davis providing school-level leadership and the full IOTA network support structure, spanning curriculum, special education, EL support, finance, operations, technology, and talent management, remaining in place.

The primary organizational focus of the renewal term is not structural change but programmatic expansion and stabilization. IOTA Community Schools is committed to expanding academic programming at Bluff City to drive consistent enrollment growth toward the school's approved capacity of 616 students. Specific expansion priorities include diversified elective offerings to strengthen student engagement and retention, expanded College and Career Technical Education (CCTE) programming to increase the percentage of students earning industry credentials and college credit, enhanced athletic programming to align Bluff City with the competitive offerings of comparable high schools in the Memphis area, and continued expansion of dual enrollment and postsecondary readiness pathways.

These programmatic investments are designed to make Bluff City a more compelling choice for Memphis families, directly supporting the enrollment recovery strategy outlined elsewhere in this application. The school's strong facility, 74,000 square feet, fully compliant, with all construction debt retired, provides the physical foundation to support this expansion without additional capital investment. The organizational infrastructure is stable, the leadership is in place, and students are accelerating. The renewal term is about going further, faster.

3. **If the school is requesting an expansion of grades served or maximum enrollment within this renewal application, explain the rationale and how this will impact the school.**

Bluff City High School is not requesting an expansion of grades served or maximum enrollment within this renewal application.

4. **Describe how the school will remain financially sustainable in the new charter term.**

Bluff City High School is well-positioned to remain financially sustainable in the next charter term. The school benefits from stable public funding streams and the broader financial strength of the IOTA network, which provides centralized oversight and support. At the beginning of the charter term, IOTA secured approximately $6.6 million in financing for facility construction and has since fully repaid this obligation. The retirement of this debt reflects strong financial management and will meaningfully reduce ongoing costs, eliminating approximately $200,000–$300,000 in annual interest expenses that had previously impacted Bluff City's budget. Enrollment projections targeting 525 students in Year 1 and growing to 597 by Year 10 provide the revenue foundation for financial sustainability, with each additional enrolled student generating incremental state per-pupil funding that directly strengthens the school's operating position.

Looking ahead, the school will continue to prioritize disciplined budgeting, ongoing financial monitoring, and strategic planning to ensure long-term stability, while also working to strengthen school-level operating performance.

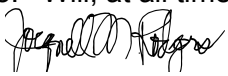
Revenue Source	Description and Sustainability
State Per-Pupil Funding	Primary revenue source based on ADM; Predictable annual allocation per TN funding formula; Enrollment of students generates stable base funding
School Wide Pool	Percentage of economically disadvantaged students qualifies for Title I; Supports interventions, PD, extended learning; Consistent federal funding stream
Federal IDEA Funds	14% students with disabilities generates IDEA funding; Supports special education services, staff, resources; Ongoing federal special education allocation
Title III (EL) Funds	19.2% English Learners qualifies for Title III; Supports EL services, materials; Predictable federal EL funding
21st Century CLC Grant	Funds comprehensive after-school program; Academic tutoring and enrichment; Multi-year grant with renewal potential; Reduces burden on operating budget
Philanthropic Support	IOTA Director of External Relations and Grants Writer secures grants and donations; Foundation grants supplement operating budget; Individual donor contributions; Corporate partnerships; Annual fundraising
In-Kind Partnerships	Mid-South Food Bank provides food assistance; Community partners provide mentoring, enrichment at low or no cost; Reduces operational expenses

Assurances

As the authorized representative of a public charter school applying to renew a charter agreement in Tennessee, I hereby certify that the information submitted in this application is true to the best of my knowledge and belief, realizing that any misrepresentation could result in disqualification from the renewal process or revocation after award; and if awarded the renewal for the charter agreement, the school must comply with all assurances within this section, and all applicable state and federal laws and regulations related to public charter schools.

I affirm that the public charter school:

1. Will operate as a public, nonsectarian, non-religious public school, with control of instruction vested in the governing body of the school under the general supervision of the authorizer and in compliance with the charter agreement and the Tennessee Public Charter Schools Act;
2. Will follow all federal, state, and local laws and regulations that pertain to the operation of a public school, unless waived according to T.C.A. § 49-13-111(p);
3. Will provide special education services for students as provided in T.C.A. Title 49, Chapter 10, Part B of the Individuals with Disabilities Education Act, Title II of the Americans with Disabilities Act of 1990, and Section 504 of the Rehabilitation Act of 1973;
4. Will adhere to all provisions of federal law relating to students who are limited English proficient, including Title VI of the Civil Rights Act of 1964 and the Equal Educational Opportunities Act of 1974, that are applicable to it;
5. Will offer a curriculum that meets all requirements including that it is aligned to Tennessee state standards (T.C.A. § 49-6-2202), does not include prohibited concepts (T.C.A. § 49-6-1019), and is not aligned to the Common Core State Standards (Chapters 205 and 471 of the Public Acts of 2021);
6. Will follow all federal and state laws and constitutional provisions prohibiting discrimination on the basis of disability, race, creed, color, national origin, religion, ancestry, or need for special education services;
7. Will comply with all provisions of the Tennessee Public Charter Schools Act, including, but not limited to:
    a. employing individuals to teach who hold a license to teach in a public school in Tennessee;
    b. complying with Open Meetings and Open Records laws (T.C.A. §§ 8-44-101 et seq.; 10-7-503, 504) (guidance is available from the Office of Open Records Counsel);
    c. not charging tuition, except for students transferring from another district to the school pursuant to the local board's out-of-district enrollment policy and T.C.A. § 49-6-3003;
    d. notwithstanding subdivision 8c, not charging registration fees, enrollment fees, or tuition to the students enrolled in an Opportunity Public Charter School;
    e. following state financial (budgeting and audit) procedures and reporting requirements according to T.C.A. §§ 49-13-111, 120, and 127;
    f. requiring any member of the governing body, employee, officer, or other authorized person who receives funds, has access to funds, or has authority to make expenditures from funds, to give a surety bond in the form prescribed by T.C.A. § 8-19-101; and
8. Will, at all times, maintain all necessary and appropriate insurance coverage.



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Signature of Authorized Applicant Representative | **Date**

Jocquell Rodgers

Printed Representative Name

Intellistack

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