



Charter School Authorizer Evaluation Report
TN Public Charter School Commission
2024

Charter School Authorizer Evaluation 2024

Authorizer: TN Public Charter School Commission

About the Charter School Authorizer Evaluations

In 2019, the General Assembly charged the State Board of Education (“State Board”) with conducting periodic evaluations of authorizers to determine authorizer compliance and evaluate quality. Tennessee was the fourth (4th) state in the U.S. to implement authorizer evaluations. The State Board partnered with [SchoolWorks](#), an education consulting group with experience in authorizer evaluations, to develop an evaluation system based on State Board [Policy 6.111 – Quality Charter Authorizing Standards](#).

As part of the development process, the State Board engaged with Tennessee authorizers, charter school stakeholders, and similar state agencies responsible for this work and conducted a pilot evaluation in Fall 2020. Upon the conclusion of the pilot evaluation, the State Board finalized its [Rule 0520-14-01-.08](#) and [Policy 6.113](#) on charter school authorizer evaluations and began implementing the evaluation process in Fall 2021. The State Board believes that quality authorizing leads to quality charter schools and increased educational opportunities for students, which is the State Board’s goal for authorizer evaluations.

Evaluation Schedule

Authorizers are assigned to an evaluation cohort (see Table 1) and undergo an evaluation at least biennially. If an authorizer receives an “Exemplary” rating for two (2) consecutive evaluations, the authorizer is exempt from undergoing an evaluation during the next evaluation year. If an authorizer receives an “Unsatisfactory/Incomplete” rating during an evaluation, the authorizer is required to participate in another authorizer evaluation in the school year immediately following the rating. An exemption or required additional evaluation does not change an authorizer’s assigned evaluation cohort.

Table 1. Cohort Evaluation Schedule

Cohort	Authorizers
Cohort 1	<ul style="list-style-type: none"> ○ Hamilton County Schools ○ Knox County Schools ○ Memphis-Shelby County Schools ○ Rutherford County Schools (beginning in the 2025-26 school year)
Cohort 2	<ul style="list-style-type: none"> ○ Achievement School District ○ Metro Nashville Public Schools ○ Tennessee Public Charter School Commission

Evaluation Process

Authorizers are evaluated using an evaluation rubric that is designed to assess authorizer compliance with the requirements of state law, the rules and regulations of the State Board, and to ensure alignment with the Quality Charter Authorizing Standards. The evaluation rubric is organized into five (5) categories: Agency Commitment and Capacity; Application Process and Decision Making; Performance Contracting; Ongoing Oversight and Evaluation; and Amendment, Renewal and Revocation Decision Making. An authorizer’s overall rating is based on the evaluation team’s consideration of evidence weighed against the evaluation rubric.

Characteristics of the Process

- Each authorizer is evaluated by an evaluation team with experience in charter school authorizing and/or authorizer evaluations. The State Board also enlists the support of a quality editor responsible for verifying the evidence and ratings for each standard and ensuring consistency across evaluations.

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- Evaluations focus on a two (2) year review term¹ and are limited to a review of evidence that was in place during that time, including the authorizer's corresponding documentation for randomly selected schools within each evaluation standard, an interview with school leaders from the authorizer's portfolio of schools, and a documentation debrief with the authorizer. The State Board also considers findings and recommendation reports and final decisions for any appeals that occurred within the two (2) year review term, as applicable.
- The evaluation team objectively evaluates the evidence by comparing it against the evaluation rubric to determine a rating (see Table 2) between zero (0) and four (4) that best represents the authorizer's performance.
- The final product of each evaluation is this Evaluation Report, which includes final scores and evaluative comments for each sub-standard of the rubric, an overall evaluation rating (see Table 3), and any required follow-up actions.
- Evaluative comments are provided to describe the nature of the documented evidence in relation to each sub-standard and relevant feedback for the authorizer. Comments also note cases in which the authorizer did not provide relevant documentation.
- Authorizer evaluations are conducted solely by the evaluation team and represent an independent evaluation of the authorizer's practices in relation to the 21 standards in the evaluation rubric.
- Following approval by the State Board, this Evaluation Report shall be provided to the authorizer and publicly posted on the State Board's website.

Table 2. Standard Ratings

0	1	2	3	4
Verbal evidence and/or documentation DOES NOT address <u>or</u> satisfy the standard	Verbal evidence and/or documentation addresses <u>and</u> satisfies LESS THAN 50% of the standard	Documentation addresses MOST <u>but</u> satisfies 50% OR LESS of the standard	Documentation addresses <u>and</u> satisfies MORE THAN 50% of the standard	Documentation addresses <u>and</u> satisfies 100% of the standard

Table 3. Overall Ratings

Score	Rating
3.50 – 4.00	Exemplary
3.00 – 3.49	Commendable
2.00 – 2.99	Satisfactory
1.00 – 1.99	Approaching Satisfactory
0 – 0.99	Unsatisfactory/Incomplete

¹ The review term for this evaluation includes documentation from September 1, 2022 - August 31, 2024.

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Executive Summary

General Information	
Authorizer:	Tennessee Public Charter School Commission ("Charter Commission")
About the Authorizer:	The Charter Commission is a state agency established in 2019 by Public Chapter 219 of the 111th General Assembly ("PC 219") to serve as the state's charter school appellate body and authorizer for any charter school that it approves upon appeal.
# Operational Schools:	13 schools in the 2023-24 school year
# Students Enrolled:	4,796 students in the 2023-24 school year
# Approved School(s) in Development: (name and planned opening year)	11 schools in development <ul style="list-style-type: none"> • Cornerstone Prep Lester Campus (moved to Charter Commission in 2024-25) • Rocketship Nashville Northeast Elementary (moved to Charter Commission in 2024-25) • Rutherford Collegiate Prep (new school opening in 2024-25) • Empower Memphis Career and College Prep (new school opening in 2025-26) • Encompass Community School (new school opening in 2025-26) • Invictus Nashville (new school opening in 2025-26) • KIPP Antioch Global Elementary School (new school opening in 2025-26) • LEAD Southeast Elementary School (moving to Charter Commission in 2025-26) • Nurses Middle College Nashville (new school opening in 2025-26) • Wooddale Middle School (moving to Charter Commission in 2025-26) • American Classical Academy Jackson-Madison (new school opening in 2025-26)
Closed Schools: (name and year closed)	0 schools closed since September 1, 2022
Evaluation Summary	

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Identified Areas of Strength

- The authorizer demonstrates a strong commitment to the quality charter authorizing standards and continuous improvement through ongoing professional development for all authorizing staff and decision-makers and impactful improvement planning in response to regular evaluation of its work against the authorizing standards.
- The authorizer utilizes experienced review teams in its charter application review process, prepares thoughtful rubric findings and questions for capacity interviews and public hearings, and drafts detailed, comprehensive recommendation reports.
- The authorizer incorporates a performance framework into the charter agreement and connects framework standards to compliance monitoring, site visits, and annual reporting.

Identified Areas for Growth

- The authorizer has made positive updates to its authorizing activities based on school feedback, yet there remains a level of frequency and duplication to oversight in certain areas that creates administrative burden on its schools.
- The authorizer lacks consistent evidence of only granting amendments to schools that demonstrate thorough preparation and strong academic results, as required by its approval criteria.
- The authorizer does not clearly communicate the criteria for renewal or have an established closure protocol.

Required Follow Up Actions

- Public recognition by the State Board which highlights the authorizer's best practices.
- Exemption from the 2026 evaluation as the authorizer achieved an Exemplary rating for two (2) consecutive evaluation years.
- Submission of a self-assessment during each of its non-evaluation years.

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Overall Ratings Summary

Standard		Rating (0-4)	Average
1a	Planning and Commitment to Excellence	3.8	3.93
1b	Human Resources	4	
1c	Financial Resources	4	
2a	Proposal Information, Questions, and Guidance	N/A	3.93
2b	Fair, Transparent, Quality-Focused Process	4	
2c	Rigorous Approval Criteria	4	
2d	Rigorous Decision Making	3.8	
3a	Charter Agreement Negotiation and Execution	3.5	3.76
3b	Terms, Rights and Responsibilities	3.8	
3c	Performance Standards	4	
3d	Provisions for Educational Service Provider (ESP) (if applicable)	N/A	
4a	Performance Evaluation and Compliance Monitoring	3.71	3.85
4b	Respecting School Autonomy	4	
4c	Protecting Student Rights	3.75	
4d	School Intervention	3.8	
4e	Public Reporting	4	
5a	Amendments to the Charter Agreement	3.25	3.48
5b	Renewal Process	3.66	
5c	Renewal Decisions Based on Merit and Inclusive Evidence	3.5	
5d	Revocation	4	
5e	Closure	3	
Overall Rating		3.76 Exemplary	

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Standard 1a - Planning and Commitment to Excellence		0	1	2	3	4
Sub-standards						
i.	Ensures that the authorizer's decision-makers, leadership, and staff understand and are committed to these quality charter authorizing principles and standards.					4
ii.	Ensures external relationships, funding structures, and lines of authority to protect its authorizing functions from conflicts of interest and political influence that might compromise its judgement in charter approval and accountability decision-making.					4
iii.	States a clear mission for quality authorizing and develops goals and timely plans for improvement in response to regular evaluation of its work against national and state authorizing standards.					4
iv.	Implements policies, processes, and practices that streamline and systematize its work toward stated goals and executes its duties efficiently.					4
v.	Makes authorizing decisions that are likely to result in positive student outcomes, based on an accumulation of evidence, data, and expertise, and in accordance with state law.				3	
Standard Rating						3.8
Evaluative Comments:						
i.	Evidence of the authorizer's presentations to decision-makers (commissioners) on topics such as authorizing roles and responsibilities, application appeals, authorizer evaluation, and annual reports, in addition to an authorizer policy on core authorizing principles, demonstrate that the authorizer's decision-makers are trained on the quality charter authorizing standards. Furthermore, according to a staff development log from September 2022 through August 2024, all authorizing staff attended trainings on quality charter authorizing principles and standards at least annually. Trainings included a presentation to all internal staff on high-quality authorizing standards and the authorizer evaluation process as well as full staff retreats where topics such as new start appeals, conflicts of interest ("COI"), and strategic planning were covered.					
ii.	The authorizer's policies 1.100 and 1.300 include requirements that all commissioners and staff complete conflict of interest statements, disclosing ownership interests, professional or lobbying affiliations, relations to employees, and other potential conflicts related to K-12 public education institutions or other entities that may be involved with the authorizer. The authorizer provided signed conflict of interest forms for 2022, 2023, and 2024.					
iii.	The authorizer states a clear mission for authorizing to "provide positive academic and life outcomes for Tennessee's students through access to high-quality public charter schools." Documentation of the action steps based on its 2022 evaluation, 2023 self-evaluation, and the strategic plan are evidence that the authorizer develops goals and plans for timely improvement in response to evaluation.					

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- iv. Commissioner-approved policies related to authorizing activities (i.e., appeals, oversight and evaluation, intervention, renewal) and local education agency (LEA) policies and procedures (i.e., special education and English learner monitoring) are implemented through documented practices (i.e., appeal recommendation reports, risk-based monitoring, annual and site visit reports, renewal recommendations). Updates to processes, including pre-opening, site visits, risk-based monitoring, and the master reporting calendar, as evident through team meeting agendas and guidance documents, align with the strategic plan goal of operational effectiveness. Biweekly newsletters, quarterly convenings, office hours, site visit feedback surveys, and ongoing responsiveness, as confirmed in school leader interviews, demonstrate practices aligned to the strategic plan goal of cultivating relationships with schools.
- v. Authorizing decisions (i.e., new school appeals, amendments, and renewals) utilize review teams with internal and external expertise, written recommendation reports, and state rubrics. Across the actions for the selected schools, commissioners made decisions in alignment with staff recommendations. However, given the amendment approval for selected school G, which received a “D” state letter grade and growth outcomes below all neighborhood elementary schools and equal to or below four (4) of five (5) middle schools, the authorizer approved an amendment request that did not align to state criteria of “academic results provide compelling support.”

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Standard 1b - Human Resources		0	1	2	3	4
Sub-standards						
i.	Through intra- or inter-agency collaborations, contractual relationships and/or staff, enlists competent staff with relevant expertise for all areas essential to charter school oversight—including, but not limited to, education leadership; instruction and assessment; local community needs; special education, English learners, and other diverse learning needs; performance management and accountability; law; finance; facilities; and nonprofit governance and management.					4
ii.	Demonstrates an on-going commitment to developing and retaining authorizing staff members and provides regular professional development for the authorizer's leadership and staff to achieve and maintain high standards of professional authorizing practice and to enable continual agency improvement.					4
iii.	Ensures authorizing is visible and the people responsible for day-to-day authorizing functions have clear opportunities to provide input with leadership and decision-makers and input is given significant weight in decision-making.					4
Standard Rating						4
Evaluative Comments:						
i.	The authorizer enlists competent staff with relevant expertise for all areas essential to charter school oversight, as supported by resumes, job descriptions, the organizational chart, and authorizer fee reports. Resumes for external reviewers demonstrate further capacity in education and authorizing expertise to assist with renewal, renewal appeal, and new start appeal decisions.					
ii.	The authorizer demonstrates an on-going commitment to developing and retaining authorizing staff members and leadership, as made evident by its professional development trackers, sample onboarding materials, staff meeting and retreat agendas and presentations, and sample Webex invitations.					
iii.	Sample authorizer newsletters to schools include points of contact for specific authorizing functions. School leaders reported knowing who to go to with authorizing questions, citing the newsletters as a source for this clarity. Furthermore, commission and committee meeting agendas and recordings, as well as executive director recommendation memos, demonstrate authorizing staff provide relevant updates and information that's given significant weight in decision-making (i.e., applications, amendments to charter agreements, budget).					

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Standard 1c – Financial Resources		0	1	2	3	4
Sub-standards						
i.	Determines the financial needs of the authorizing office and devotes financial resources to fulfill its authorizing responsibilities in accordance with national and state standards, commensurate with the scale of the charter school portfolio, and in accordance with Tennessee law, including all relevant requirements for use of the authorizer fee.					4
ii.	Deploys funds effectively, transparently, and efficiently with the public and student interests in mind.					4
iii.	Annually reports the authorizing obligations fulfilled using the authorizer fee in accordance with state law.					4
Standard Rating						4
Evaluative Comments: <ul style="list-style-type: none"> i. The authorizer fee reports, authorizing office budgets, business operations committee agendas, and organizational chart/job descriptions make evident that the authorizer determines financial needs that are commensurate with the scale of its portfolio and support fulfillment of its authorizing responsibilities. Budgets indicate use of state funding and authorizer fees for allowable expenses, including full-time employee salaries and benefits, professional services, commission meetings, staff travel for school visits, technology and data processing, and state agency services. ii. Authorizer fee reports and authorizing office budgets from the review term detail the authorizer's use of authorizer fee and state allocated funds. The authorizer fee reports and the authorizer's narrative describe a spending process informed by authorizer responsibilities (i.e., approval, oversight, renewal) and LEA responsibilities (i.e., data systems, IEP oversight). A website screenshot and letters demonstrate sharing the authorizer fee reports to the charter sector. While having no impact on the score, the review team did note a net surplus of approximately \$900,000 in the fiscal year 2023 and 2024 budgets. School leaders communicated questions regarding the use of state versus authorizer fee revenue and how important every dollar is for supporting classrooms. In the document debrief, the authorizer acknowledged the challenging nature of balancing competing demands. The authorizer may want to provide greater clarity on how determinations related to which revenue streams are used and how much authorizer fee is returned to increase transparency in the decision-making process. iii. Two (2) authorizer fee reports contain clear descriptions for the use of funds (i.e., salaries and benefits, staff development, application reviewers). E-mail communication and memos to the authorizer's school operators confirm the reports were submitted to the Tennessee Department of Education ("TDOE") by the annual December 1 deadline. Both fee reports denote returning surplus fees following the amounts used (33% in fiscal year 2022 and 22% in fiscal year 2023). 						

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Standard 2a - Proposal Information, Questions, and Guidance		0	1	2	3	4
Sub-standards						
i. Develops and issues a charter application information packet or request for proposals (RFP) that: <ul style="list-style-type: none"> a) States the authorizer's mission and any chartering priorities the authorizer may have established; b) Provides the state's required comprehensive application and rubric to elicit the information needed for rigorous evaluation of applicants' plans and capacities; and c) Communicates clear guidance, requirements and timelines with prospective operators regarding the application content and format, while explaining evaluation criteria. 		N/A				
Standard Rating						N/A
Evaluative Comments: This standard is N/A as the authorizer is an appellate body and does not solicit or receive new start charter applications directly.						

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Standard 2b - Fair, Transparent, Quality-focused Process		0	1	2	3	4
Sub-standards						
i.	Implements a charter application process that is defined in policy, open, well-publicized, and transparent, and is organized around clear, realistic timelines.					4
ii.	Allows sufficient time for each stage of the application and school pre-opening process to be carried out with quality and integrity and explains how each stage of the application process is conducted and evaluated.					4
iii.	Engages, for both written application reviews and applicant interviews, highly competent teams of internal and external evaluators with relevant academic, organizational (governance and management), financial, and legal expertise, as well as thorough understanding of the essential principles of charter school autonomy and accountability.					4
iv.	Provides orientation or training to application evaluators (including interviewers) to ensure consistent evaluation of standards, practices, and the fair and unbiased treatment of all applicants.					4
Standard Rating						4
Evaluative Comments:						
i.	The authorizer implements the charter application process outlined in commission rule and policies 2.000 and 2.100 and a new start appeal guidance document (i.e., notice of appeal/submission of an amended application, requests for additional information, including fiscal impact as applicable, a public hearing, capacity interview, review committee evaluation, written recommendation, and commission decision) as evidenced by completed applications, public hearing scripts, capacity interview questions and video recordings, evaluation reports with recommendations, and resolutions. These artifacts further affirm alignment with stipulated timelines, and a website screenshot confirms public availability of related rule, policy, and guidance on the authorizer's website.					
ii.	Letters from the authorizer's general counsel to selected schools A and B with a linked guidance document included demonstrate communication of timelines, stages of the appeals process (i.e., application evaluation, capacity interview, public hearing and public comment, and staff record review), and evaluation criteria (i.e., use of the state's scoring rubric, further clarity of the application, and assessment of capacity). Evidence affirms that these stages occurred in the authorizer's review of the selected schools' applications according to communicated timelines.					
iii.	As required by commission rule and policy 2.100, and confirmed by lists of review team names and resumes for selected schools A and B, the authorizer engages review team members with relevant academic, organizational, and financial expertise. Multiple members of each review team had charter school and/or authorizing experience. A member of review team A has a legal background and the authorizer's general counsel participated in the capacity interview and hearing for selected school B.					
iv.	The authorizer's policy states that training will be provided to review team members; copies of training materials from July 2022 and 2023 demonstrate training was delivered on application review, including time for norming practice. Attendance trackers demonstrate all review team					

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members received training. The authorizer also requires completion of a COI form from all review team members to ensure the fair and unbiased treatment of applicants, and completed forms were provided for all review team members for selected schools A and B.

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Standard 2c - Rigorous Approval Criteria Sub-standards	0	1	2	3	4
<p>i. Utilizes the state's required application and rubric which:</p> <ul style="list-style-type: none"> a) Requires all applicants to present a clear and compelling mission, a quality educational program, a demonstration of community support, a solvent and sustainable budget and contingency financial plans, a clear demonstration of the effectiveness of the model for the target student population and students with diverse needs, effective governance and management structures and systems, founding team members demonstrating diverse and necessary capabilities in all phases of the school's development; b) Establishes distinct requirements and criteria for applicants who are existing school operators or replicators including: <ul style="list-style-type: none"> 1. Clear evidence of their capacity to operate new schools successfully while maintaining quality in existing schools; 2. Documentation of their educational, organizational, and financial performance records based on all existing schools; 3. Explanation for any never-opened, closed, revoked, or non-renewed schools (including closed, revoked or non-renewed third-party contracts to operate schools); 4. Presentation of their growth plan, business plan, and most recent financial audits; 5. Evidence of meeting high standards of academic, organizational, and financial success to earn approval for replication; and 6. Document any current or past litigation and the resolution of such litigation. c) Establishes distinct requirements and criteria for applicants proposing to contract with educational service providers (ESPs), including charter management organizations by requiring applicants to provide: <ul style="list-style-type: none"> 1. Evidence of the service provider's educational and management success; 2. A description of the process for selecting the ESP; 3. A draft (or existing) service/management contract that sets forth proposed key terms, including roles and responsibilities of the school governing board, the school staff, and the service provider; the services and resources to be provided; performance-evaluation measures and mechanisms; detailed 					4

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<p>explanation of compensation to be paid to the provider; financial controls and oversight; investment disclosure; methods of contract oversight and enforcement; and conditions for contract renewal and termination; and</p> <p>4. Disclosure and explanation of any existing or potential conflicts of interest between the school governing board and proposed service provider or any affiliated business entities.</p> <p>d) Considers diverse educational philosophies and approaches.</p> <p>e) Requires applicants to demonstrate capacity to serve students with diverse needs, including students with disabilities or learning exceptionalities, English learners, at-risk students, and gifted students.</p>					
<p>ii. Requires all applicants to participate in a capacity interview to elicit evidence-based explanations which allow the applicant to demonstrate clear evidence of capacity to execute its plan successfully.</p>					4
Standard Rating					4
Evaluative Comments: <p>i. The authorizer's review of appealed applications that use the state's template and completed state rubrics for selected schools A and B make evident its use of the rigorous approval criteria cited in this sub-standard.</p> <p>ii. Interview questions and video recordings from the capacity interviews for selected schools A and B demonstrate the authorizer requires charter school applicants to participate in a capacity interview to demonstrate evidence of capacity to execute its plan. Topics discussed during the capacity interviews include implementing the academic plan, serving special populations, community demand for the selected schools, governance qualifications, facilities, and budget assumptions.</p>					

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Standard 2d - Rigorous Decision Making		0	1	2	3	4
Sub-standards						
i.	Grants charters only to applicants that have demonstrated competence and capacity to succeed in all aspects of their particular charter school model, consistent with the stated approval criteria.					4
ii.	Rigorously evaluates each application through thorough review of the written proposal, a substantive in-person interview with each qualified applicant, and all appropriate due diligence to examine the applicant's experience and capacity.					4
iii.	Ensures that the application-review process and decision making are free of conflicts of interest and requires full disclosure of any potential or perceived conflicts of interest between applicants, the reviewers, and the decision makers.					4
iv.	Promptly notifies applicants of its application decision, explaining in writing any available rights of legal or administrative appeal through which a school may challenge the authorizer's decision and including written explanation of the evidence-based factors that determined the decision so that applicants can decide if they wish to revise their plans based in part on that information and resubmit in the future.				3	
v.	Does not make application decisions on the basis of political or community pressure.					4
Standard Rating						3.8
Evaluative Comments:						
i.	Executive director recommendation reports, sample completed rubrics, resolutions, and recorded commissioner meetings for selected schools A and B demonstrate granting charters only to applicants that meet or exceed rubric criteria and are in the best interests of students, LEA, or community as per authorizer policy and state law.					
ii.	The authorizer evaluates each applicant's experience and capacity as evidenced by sample completed rubrics, capacity interview questions and video recordings, and public hearing questions for the local district and sponsor. Executive director recommendation reports contain summaries of due diligence evidence related to the local district's evaluation process, receipt of public comment, and fiscal impact analyses as applicable. While not impacting the score, the authorizer's analysis of the substantial negative fiscal impact for selected school B fails to consider the proposed school's full enrollment at scale (144 in year one versus 432 in year five and 792 at scale), which exceeds projected and actual enrollment fluctuations in the two (2) most recent years, per the recommendation report. The analysis also does not consider the impact of federal stimulus money on the current and future financial look nor the aggregate fiscal impact of approving three additional appeals in the 2022-23 school year for the same selected school district. The authorizer should evaluate how it determines fiscal impact on a district in an appeal and how it's process for review aligns with a district's own internal review when making appeal decisions.					

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- iii. Authorizer policy requires that the application review process, review committee members, and decision-making process are free of conflicts. Signed conflict of interest statements were provided for all review committee members for selected schools A and B. Additionally, as per authorizer policy, commissioners complete an annual conflict of interest disclosure statement; signed statements were provided for commissioners for 2022 and 2023. As noted above and not impacting the score, printed names should be included on all statements moving forward to confirm signatures.
- iv. Decision letters dated within five (5) business days of the commissioners' vote for selected schools A and B demonstrate that the authorizer promptly notifies applicants of its decision. Decision letters included an explanation of the right to reapply in the future or to work with the local LEA on an agreement to authorize within 30 days. While the narrative noted incorporating the evidence-based factors that determined a denial moving forward, such factors were not included in the decision letter for selected school A.
- v. Resolutions and video recordings of commissioner meetings for selected schools A and B illustrate the decision-makers approving and denying applications in alignment with commission rule and policy. Recordings demonstrate that decision-makers reviewed application materials, listened to capacity interviews, and possessed knowledge of application contents to inform evidence-based decisions that were free from the influence of political or community pressure.

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Standard 3a - Charter Agreement Negotiation, and Execution		0	1	2	3	4
Sub-standards						
i.	Executes a charter agreement between the authorizer and a legally incorporated governing board independent of the authorizer.				3	
ii.	Ensures mutual understanding and acceptance of the terms of the charter agreement by the school's governing board.					4
Standard Rating						3.5
Evaluative Comments:						
i. While the charter agreement for selected school D is signed by the governing board and authorizer within a month of the effective date, the charter agreement for selected school C, while signed by both appropriate parties, was executed in April 2022 and not signed until January and February 2023, which is more than six (6) months later, as is an expectation of this sub-standard. ii. Documented welcome letters from the authorizer and to selected schools C and D demonstrate that the authorizer sent the charter agreement template to the schools prior to execution for their review and revision. The letters expressed that the template and waiver list would be discussed further to come to mutual agreement.						

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Standard 3b – Terms, Rights and Responsibilities		0	1	2	3	4
Sub-standards						
i.	Grants charter agreements for an initial term of ten operating years with the authorizer conducting a high-stakes review every five years and producing annual performance reports.					4
ii.	Explicitly defines material terms of the charter agreement.					4
iii.	Allows – and requires charter agreement amendments for – occasional material changes to a school’s plans but does not require a formal amendment process for modifications to non-material terms of the charter agreement.					4
iv.	Executes charter agreements that clearly: <ul style="list-style-type: none"> a. State the rights and responsibilities of the school and the authorizer; b. State and respect the autonomies to which schools are entitled—based on statute, waiver, or authorizer policy—including those relating to the school’s authority over educational programming, staffing, budgeting, and scheduling; c. Define performance standards, criteria, and conditions for renewal, intervention, revocation, and non-renewal, while establishing the consequences for meeting or not meeting standards or conditions; d. State the statutory, regulatory, and procedural terms and conditions for the school’s operation; e. State reasonable pre-opening requirements or conditions for new schools to ensure that they meet all health, safety, and other legal requirements prior to opening and are prepared to open smoothly; f. State the responsibility and commitment of the school to adhere to essential public-education obligations, including admitting and serving all eligible students so long as space is available, and not expelling or counseling out students except pursuant to a legal discipline policy; and g. State the responsibilities of the school and the authorizer in the event of school closures. 				3	
v.	Ensures that purchasing any fee-based services that the authorizer provides is explicitly not a condition of charter approval, continuation, or renewal.					4
vi.	For any fee-based services that the authorizer provides, the authorizer develops a separate services agreement that respects charter school autonomy and treats the charter school equitably compared to district schools, if applicable.					N/A

Standard Rating

3.8
Evaluative Comments:

- i. Charter agreements for selected schools C and D have charter terms that expire on June 30 of the tenth year of operation. Section 1.4 Charter School Performance of the charter agreements for selected schools C and D states that the authorizer shall at least annually monitor and report on performance framework outcomes and indicates that an interim review shall be conducted during the fifth (5th) year of a charter term.
- ii. Material terms are defined throughout the charter agreements for selected schools C and D, such as section 1.5 “location”, section 1.7 “mission”, and section 2.1 “student enrollment and retention”. The approved new-start application or renewal application is also attached as Exhibit 1 and incorporated by reference.
- iii. Charter agreements for selected schools C and D require amendments for all areas outlined in 3biii, either through explicit incorporation or legal reference to commission rule. While having no impact on the score, the authorizer may want to consider updating authorizer policies related to amendments to more clearly align with all six (6) required material change areas outlined in the Charter Commission’s Rule.
- iv. Most of the seven (7) areas of the sub-standard are addressed in the charter agreements for selected schools C and D. The agreements incorporate a performance framework and state that the performance framework will supersede all assessment measures for purposes of renewal and revocation; however, the agreements do not define what ratings or level of performance on the performance framework triggers renewal versus non-renewal, intervention, and revocation. Lastly, while there is language in section 11.3 concerning closure and cooperation between the authorizer and charter school, it does not define responsibilities of each party or link/incorporate a policy or protocol with responsible parties. While not impacting the score, selected school C’s charter agreement was signed in 2022, but incorporates the 2024 performance framework without any further documentation of the charter school accepting the updated framework. The charter agreement states that changes to the performance frameworks that are not required by state or federal law or accountability requirements, will not become binding without the charter school’s consent.
- v. Section 9.3 of the charter agreements for selected schools C and D includes the option to contract with the authorizer for services, such as for transportation or food service, and explicitly states that failure to enter into such an agreement is not a condition of revocation or non-renewal.
- vi. N/A – Selected schools C and D do not currently have any fee-based service agreements with the authorizer.

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Standard 3c - Performance Standards					
Sub-standards					
	0	1	2	3	4
i. Executes charter agreements with a performance framework incorporated in the agreement, commonly as an attachment, that plainly establishes the standards under which schools will be evaluated and includes: <ul style="list-style-type: none"> a. Objective and verifiable measures of student achievement as the primary measure of school quality, in accordance with state law; b. Clear, measurable, and attainable academic, financial, and organizational performance standards and targets that the school must meet as a condition of renewal, including but not limited to state and federal measures; c. Expectations for appropriate access, education, support services, and outcomes for students with disabilities; 					4
ii. The performance framework includes clearly defined and measurable indicators, measures, metrics, and targets that: <ul style="list-style-type: none"> a) Academic Performance <ul style="list-style-type: none"> 1. Define the sources of academic data that will form the evidence base for ongoing and renewal evaluation; 2. Set expectations for student academic achievement status or proficiency, including comparative proficiency; 3. Set expectations for student academic growth, including adequacy of growth toward state standards; 4. Incorporate state and federal accountability systems, including state grading and/or rating systems; 5. Set expectations for postsecondary readiness, including graduation rates (for high schools); and 6. Provide schools an option to incorporate mission-specific performance measures for which the school has presented valid, reliable, and rigorous means of assessment approved by the authorizer (optional). b) Financial Performance <ul style="list-style-type: none"> 1. Define the sources of financial data that will form the evidence base for ongoing and renewal evaluation, including the school's annual financial audit conducted by a qualified independent auditor; 					4

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<p>2. Enable the authorizer to monitor and evaluate the school's financial stability and viability based on short-term performance; and</p> <p>3. Enable the authorizer to monitor and evaluate the school's long-term financial sustainability.</p> <p>c) Organizational Performance</p> <p>1. Define the sources of organizational data that will form the evidence base for ongoing and renewal evaluation;</p> <p>2. Define the essential elements of the educational program for which the authorizer will hold the school accountable;</p> <p>3. Define financial management and oversight standards based on generally accepted accounting principles;</p> <p>4. Hold school governing boards accountable for meeting statutory and board-established operating and reporting requirements;</p> <p>5. Ensure school compliance with student and employee rights and obligations; and</p> <p>6. Establish expectations related to the school environment, including health and safety, transportation, facilities, and appropriate handling of records.</p>					
Standard Rating					4
<p>Evaluative Comments:</p> <p>i. Academic, organizational, and financial performance frameworks that establish standards for evaluation are attached as Exhibit 2 in the charter agreements for selected schools C and D. The academic framework contains objective and verifiable measures of student achievement (i.e., TDOE's accountability grades, TVAAS composite scores). Targets are set for "falls far below standard", "does not meet standard", and "meets standard" across academic, organizational, and financial standards and outcomes on said standards align with annual oversight systems, supplemental framework guidance, and annual reporting. The organizational framework addresses the rights of students with disabilities under the education program and includes assessment of equitable access and opportunity to enroll, identification and referral, implementation of IEPs and 504 plans, discipline due process, and other compliance protections.</p> <p>ii. The academic, organizational, and financial performance frameworks attached as Exhibit 2 within each selected charter agreement (non-high schools) contain all the relevant performance indicators set forth in 3cii. Academic performance defines data sources (i.e., TDOE grades, TVAAS) and selected schools C and D have measurable, mission-specific goals incorporated. Nine near-term and sustainability financial measures are calculated, each with an audit data source noted. Lastly, six (6) organizational indicators, each with sub-measures, encompass all required areas and embed data sources</p>					

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(i.e., complying with governance requirements through board bylaws, policies, and membership review). While having no impact on the score, the framework needs to be updated to include expectations for graduation as this is no longer part of the state's letter grade calculation.

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Standard 3d - Provisions for Educational Service Provider (ESP) (if applicable)	0	1	2	3	4
Sub-standards					
i. Includes, for any school that contracts with an ESP provider for the management of its educational program, finances, or school operations, provisions within the charter agreement that: ² <ol style="list-style-type: none"> Clearly establish the primacy of the charter agreement over the ESP contract; Clearly identify the school governing board as the party ultimately responsible for the success or failure of the school, and clearly define the ESP as a vendor of services; Prohibit the ESP from selecting, approving, employing, compensating, or serving as school governing board members; Provide for sufficient transparency around the spending of public monies; and Require all instructional materials, furnishings, and equipment purchased or developed with public funds to be the property of the school, not the ESP, in compliance with state law. 			N/A		
ii. Reviews the proposed ESP contract with the charter school's governing board to ensure that it is consistent with applicable law, authorizer policy and the public interest, and requires, prior to contract execution, the contract between the ESP and the charter school's governing board to articulate: <ol style="list-style-type: none"> The roles and responsibilities of the school governing board and the ESP, including all services to be provided under the contract; The performance measures, consequences, and mechanisms by which the school governing board will hold the SEP accountable for performance, aligned with the performance measures in the charter agreement; All compensation to be paid by the ESP, including all fees, bonuses, and what such compensation includes or requires; Terms of any facility agreement that may be part of the relationship; Financial reporting requirements and provisions for the school governing board's financial oversight; All other financial terms of the contract, including disclosure and documentation of all loans or investments by the ESP to the school, and provision for the disposition of assets in accordance with law; 			N/A		

² The standard does not apply to contracts with ESPs that do not have substantial responsibility for education, operational, and financial operations such as for payroll, textbooks, curriculum, etc.

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<ul style="list-style-type: none"> g. Assurances that the school governing board, at all times, maintains independent fiduciary oversight and authority over the school budget and ultimate responsibility for the school's performance; h. Provisions for contract termination; and i. Respective responsibilities of the governing board and ESP in the event of school closure, including transparency in the school's revenues and expenditures, as well as those managed by the ESP. 	
Standard Rating	
N/A	
Evaluative Comments: This standard is N/A as selected schools C and D do not contract with an educational service provider.	

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Standard 4a – Performance Evaluation and Compliance Monitoring					
Sub-standards					
	0	1	2	3	4
i. Implements a comprehensive performance accountability and compliance monitoring system that is defined by the charter agreement, outlined in policy, and provides the information necessary to make rigorous and standards-based renewal, revocation, and intervention decisions.					4
ii. Defines and communicates to schools the process, methods, and timing of gathering and reporting school performance and compliance data.					4
iii. Implements an accountability system that effectively streamlines federal, state, and local performance expectations and compliance requirements while protecting schools' legally entitled autonomy and minimizing schools' administrative and reporting burdens.				3	
iv. Solicits feedback from its schools and utilizes the results to provide clear technical guidance to schools as needed to ensure timely compliance with applicable rules and regulations.					4
v. Conducts at least one formal on-site review to each school annually, uses the evidence collected to inform the school's annual evaluation, and provides schools with a report summarizing the review.					4
vi. Proactively communicates the purpose of any proposed on-site visit and ensures visits are used for collecting data that cannot be obtained otherwise and in accordance with the contract, while ensuring that the frequency, purposes, and methods of such visits respect school autonomy, minimize administrative burdens, and avoid operational interference.					4
vii. Evaluates each school annually on its performance and progress toward meeting the standards and targets stated in the charter agreement, including essential compliance requirements, and clearly communicates evaluation results to the school's governing board and leadership.				3	
Standard Rating					3.71
Evaluative Comments:					

- i. The charter agreements for selected schools E and F outline elements of a performance accountability and compliance monitoring system in section 1.4, including (1) basing amendment, renewal, and revocation decisions on applicable law, rule, policy, and the attached performance frameworks, (2) conducting an annual monitoring visit, (3) investigating complaints, (4) interviewing stakeholders, (5) providing a master reporting calendar, and (6) reporting at least annually on performance framework progress. These pieces are reiterated in the authorizer's oversight and evaluation policy. The authorizer implements this system as evidenced by a site visit internal protocol and reports, annual reporting calendars, quarterly review letters, federal programs monitoring guidebook and other monitoring procedures, and school-specific annual reports aligned to the performance framework. School leaders confirmed execution of various facets of oversight, including the reporting calendar, quarterly reviews, annual site visits, and annual reports.
- ii. The authorizer defines and communicates its process, methods, and timing of gathering school performance and compliance data through its annual reporting calendar. It uses Microsoft Teams for data and document collection. The authorizer's narrative, and a supporting presentation, demonstrate the authorizer communicates expectations related to the reporting calendar during pre-opening and reiterates reporting expectations through quarterly newsletters, of which samples were provided. Sample quarterly review letters for selected schools E and F demonstrate the authorizer provides feedback on organizational framework indicators based on reporting requirements, other monitoring, and site visits four (4) times per, in addition to the annual authorizer report.
- iii. Evidence of the authorizer implementing annual routines within its accountability system include (1) the master reporting calendar, which streamlines compliance requirements, (2) annual reports, which share outcomes for each school on performance framework indicators, and (3) annual site visit reports. While the authorizer has taken documented steps to minimize the administrative and reporting burden (i.e., requesting only one (1) policy for all charter management organization schools rather than a policy for each school, half day site visits with less logistical planning), there remains a level of frequency and duplication that continues to foster administrative burden. For example, asking for duplicative documents in the master calendar and site visit protocol, requesting monthly or quarterly personnel submissions, reviewing English learner and special education files during site visits, as well as through quarterly or monthly desktop monitoring as per procedure documents and quarterly review letters. Furthermore, as indicated in the document debrief presentation, school improvement plan progress monitoring is part of quarterly reviews and site visits; special population file monitoring is part of quarterly reviews, results-based monitoring, and site visits. During the school leader interview, some school leaders described ongoing requests every month and that all compliance expectations, be it specific language in a policy or student outcomes, were seen as equally important.
- iv. The authorizer holds quarterly stakeholder meetings, as evidenced by agendas and presentations, which include technical guidance related to compliance and provided evidence of how feedback from stakeholders informs process changes and technical assistance (i.e., developing a pre-opening checklist and protocol for schools in response to a request for feedback on the authorizer's pre-opening process). The authorizer also sends out bi-monthly newsletters, which contain authorizer updates, training opportunities, office hour opportunities, and TDOE updates and reporting requirements.
- v. A site visit protocol and three (3) site visit reports (two (2) for selected school E, one (1) for selected school F due to an interim review year) demonstrate the authorizer conducts one (1) formal on-site review annually, which aligns with charter agreement expectations, and produces a report summarizing the review. The site visit protocol states that the site visit and site visit report will gather, and articulate evidence aligned with certain performance framework elements, including mission, student performance, student recruitment and retention, financial monitoring, governance, and other compliance requirements. While not impacting the score, the site visit protocol also extends beyond the framework in other areas through observations and interviews, including curriculum and assessments, student engagement, family engagement and satisfaction, and

students' social and emotional needs. The authorizer may seek to further clarify in what ways these insights observed during site visits directly inform performance framework evaluation and in what ways they supplement and for what purpose.

- vi. A site visit protocol, emails related to scheduling, quarterly charter school stakeholder meeting agendas, and site visit kick off webinars demonstrate sharing information about site visits. The purpose ("to augment data that cannot be obtained otherwise through the Charter School Performance Framework" and methods (classroom observations, interviews, document review) are outlined in the site visit protocol. Charter agreements for selected schools E and F provide authority to conduct an annual comprehensive site visit and state that specific documentation will be requested in advance, which is outlined in the protocol.
- vii. School-level performance framework results in authorizer annual reports for selected schools E and F demonstrate the authorizer's annual evaluation of its schools. While annual reports are available on the authorizer website, as a screenshot confirms, and emails provide evidence of communicating results to the selected schools' governing boards and leadership during the 2023-24 school year, there is no further evidence of communicating the 2021-22 annual report with selected school F during the 2022-23 school year.

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Standard 4b - Respecting School Autonomy		0	1	2	3	4
Sub-standards						
i.	Respects the school's authority over its day-to-day operations by refraining from directing or participating in educational decision or choices that are within a school's purview under the charter law or contract and does not conflict with the authorizer's additional responsibilities as the local education agency.					4
ii.	Collects information from the school in a manner that minimizes administrative burdens on the school, while ensuring that performance and compliance information is collected with sufficient detail and timeliness to protect student and public interests.					4
iii.	Regularly reviews compliance requirements and evaluates the potential to increase school autonomy based on flexibility in the law, streamlining requirements, demonstrated school performance, or other considerations.					4
Standard Rating						4
Evaluative Comments: <ul style="list-style-type: none"> i. The authorizer's reporting calendar, policies and LEA procedures, performance framework and authorizer reports, site visit reports, and bi-monthly newsletters demonstrate a focus on performance outcomes and compliance and restraint from directing educational choices within a school's purview. A sample notice of probationary status communication affirms a charter school's ownership over development of the corrective action plan and responsibility for remedying the deficiencies. The letter notes that a suggestion document for developing the corrective action plan will be provided, but optional to use. While not impacting the score, school leaders provided mixed feedback related to respecting school autonomy with some citing no involvement in educational decisions and others stating the authorizer has, at times, overreached into decisions concerning scheduling and programmatic decisions. ii. The annual master reporting calendar, published in advance of each school, use of Microsoft Teams (verified through snapshots), and training on the calendar and Teams during pre-opening (verified through training materials) provides centralized guidance and collection on reporting requirements with sufficient detail and advanced notice. iii. Feedback from end-of-year close-out meetings, as verified through agendas, informs updates to the authorizer's requirements. For instance, based on feedback regarding the pre-opening process, pre-opening checklists were differentiated for various entry types (i.e., brand new school versus a school transitioning from the Achievement School District) with removed requirements as warranted, as evidenced through authorizing staff meeting agendas, updated checklists, and the authorizer interview. Additionally, site visit feedback and survey responses informed a change to half day visits for eligible schools and the amount of pre-visit preparation time put on schools. 						

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Standard 4c - Protecting Student Rights		0	1	2	3	4
Sub-standards						
i.	Ensures that schools admit students through a random selection process that is open to all students, is publicly verifiable, and does not establish undue barriers to application (such as mandatory information meetings, mandated volunteer service, or parent contracts) that exclude students as provided by federal, state, and local law.				3	
ii.	Ensures that schools provide equitable access and inclusive services to all students as required by applicable federal and state law, including, but not limited to, students with disabilities, English learners, homeless students, students in foster care, migrant students, at-risk students, and gifted students.					4
iii.	Ensures clarity in the roles and responsibilities of all parties involved in serving students with disabilities.					4
iv.	Ensures that schools' student discipline policies and actions are legal, fair, and equitable and that no student is suspended, expelled, or counseled out of a school outside of that process, and that schools have a clear process for addressing parent/community grievances.					4
Standard Rating						3.75
Evaluative Comments:						
i.	Enrollment policies are collected by the authorizer for all schools, as evidenced in the reporting calendar, and whether policies are designed to ensure fair and equitable enrollment is included in the performance framework and annual reports. While enrollment lottery certifications were provided for selected school F, they were not for selected school E. Furthermore, there is no additional evidence of authorizer-led compliance reviews regarding enrollment, such as reviewing a charter school's enrollment materials, waitlist, and/or enrollment requirements to ensure alignment with law.					
ii.	The authorizer ensures that schools provide equitable access and inclusive services to all student groups above as documented in procedural documents for special populations, charter agreements for the selected schools, in site visit protocols (file audits) and reports, desktop audits, results-based monitoring, memos, and training materials.					
iii.	The authorizer ensures clarity in the roles and responsibilities of all parties involved in serving students with disabilities as stated in section 2.3 of the charter agreements for selected schools E and F and as documented in the authorizer's LEA procedures for special education monitoring. Results-based monitoring materials indicate the authorizer's communication with schools regarding procedures, roles, and responsibilities for serving students with disabilities.					
iv.	Authorizer policy 6313, regarding student discipline, sets forth expectations for charter school's discipline policy/code of conduct. These expectations can be evaluated through review of student and parent handbooks, as well as zero tolerance policies, which are submitted annually to the authorizer, as verified in the master reporting calendar. Furthermore, a quarterly stakeholder presentation confirms that authorizer policy 1200, related to					

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grievances and complaints, is reviewed through an annual audit and the authorizer noted reviewing policy and parent complaints that come to the commission during the document debrief. Additionally, student discipline is included in the framework and framework evaluations. While not impacting the score, the authorizer confirmed review of discipline-related data during the document debrief but may want to consider how to further evaluate a school's implementation of its policies (i.e., due process) to ensure discipline actions are legal, fair, and equitable.

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Standard 4d - School Intervention		0	1	2	3	4
Sub-standards						
i.	Establishes and clearly communicates to schools at the outset an intervention and problem-solving policy that states the general conditions that may trigger intervention and the types of actions and consequences that may ensue.					4
ii.	Utilizes ongoing oversight and evaluation processes to determine when intervention in non-emergency situations is needed.					4
iii.	Provides clear, evidence-based, and timely notice of contract violations or performance deficiencies that are aligned to the intervention policy and is communicated to the school leaders and governing board.					4
iv.	Allows schools reasonable time and opportunity for remediation in non-emergency situations.					4
v.	Engages in intervention strategies that clearly preserve school autonomy and responsibility (identifying what the school must remedy without prescribing solutions) while clearly stating possible consequences for noncompliance.				3	
Standard Rating						3.8
Evaluative Comments:						
i.	The authorizer's intervention policy 3.400 contains conditions warranting authorizer intervention (i.e., "falls far below standard" on performance framework areas), actions (i.e., letter to the governing board, submission of a corrective action plan), and consequences (i.e., continued failure to meet performance targets or improve financial weaknesses raises the status level up through possible revocation). The policy is linked in quarterly performance reviews as verified by samples.					
ii.	Notices of probationary status for continued failure to meet performance targets with submission of a corrective action plan and a notice of concern for compliance violations demonstrate that the authorizer utilizes its oversight, intervention, and evaluation processes to determine when intervention is needed. These conditions, actions, and consequences align with the authorizer's intervention policy.					
iii.	The notices of probationary status were timely in July in advance of the 2022-23 and 2023-24 school years to allow for goal setting and action planning in the summer as part of the corrective actions plans; letters are addressed to the school board chair and provide evidence of ongoing meeting and communication with the school leader. The notice of concern is addressed to the board chair and executive director, also following a reporting cycle, and includes specific compliance violations for resolution. As noted above, these instances align with the authorizer's intervention policy.					
iv.	Formal notices submitted by the authorizer specifically detail next steps and reasonable time and opportunity for issue resolution.					
v.	The notices of probationary status identify areas off track from the interim report, recognizes the school's autonomy to remedy deficiencies, and provides an optional suggestion document for developing the corrective action plan, which is driven by the school. The notice of concern, which is largely based on organizational and financial compliance violations, contains required compliance remedies; however, it also requires attending					

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certain financial and special education trainings, which prescribes activities that push against autonomy, rather than communicate and hold the school accountable for satisfying the compliance expectation.

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Standard 4e - Public Reporting		0	1	2	3	4
Sub-standards						
i.	Produces and communicates to its decision-makers, charter school leaders, and the public an annual authorizer report that: <ul style="list-style-type: none"> a. Provides clear, accurate performance data for the charter schools it oversees; b. Reports on individual school and overall portfolio performance according to the framework set forth in the charter agreement in accordance with state law; and c. Reports on the authorizer's performance in meeting its goals. 					4
Standard Rating						4
Evaluative Comments: <ul style="list-style-type: none"> i. The 2023 and 2024 authorizer annual reports present academic, financial, and organizational performance data and ratings aligned to the performance framework set forth in the charter agreement. Each report contains an overall school performance summary table with overall rating in each of the three performance areas. The 2023 annual report represents the first year of outcomes with authorized schools and acknowledges the strategic plan adopted in 2022; the subsequent annual report shares that the authorizer was on track for meeting established benchmarks aligned to strategic plan priorities. Authorizer newsletters, sample end-of-year meeting agendas, a screenshot of the authorizer's website, and committee agendas and presentation materials demonstrate that the annual reports are communicated with decision-makers, school leaders, and the public. 						

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Standard 5a – Amendments to the Charter Agreement		0	1	2	3	4
Sub-standards						
i.	Establishes and clearly communicates to schools an amendment process that's aligned to the charter agreement and state law, utilizes the state's required application, and follows the state's required timeline and approval criteria.					4
ii.	Promptly notifies a school of its amendment decision, including written explanation of the evidence-based reasons for the decision and explains in writing any available rights of legal or administrative appeal through which a school may challenge the authorizer's decision.			2		
iii.	Grants amendments only to schools with a petition that demonstrates alignment to the school's mission and goals and provides specific, evidence-based information that shows thorough preparation and viability of the plan.				3	
iv.	Does not make amendment decisions on the basis of political or community pressure.					4
Standard Rating						3.25
Evaluative Comments:						
i.	The authorizer has adopted two (2) charter agreement amendment-related policies (3.100 and 3.900), which are publicly available on the authorizer's website, require amendments for material changes, and outline steps in the process (i.e., submission of supporting documentation, interview, written recommendation and commission decision), and incorporate an expectation to meet requirements outlined in the TDOE amendment petition application. The charter agreement references material changes and timelines concerning amendments in accordance with State Board Rule. Email and calendar invitations demonstrate ongoing communication between the authorizer and selected schools regarding amendments. Regarding implementation, the state's letter of intent, application, and rubric were used, and timelines were met. School leaders confirmed a general awareness of the steps and timelines in the amendment process.					
ii.	While the authorizer provided email communication for selected school H of negotiating amended language to the charter agreement prior to commission approval, there is no documented evidence, outside of amended agreements themselves, of promptly notifying either selected school of the amendment decisions and the evidence-based reasons for the decision. The authorizer did note that representatives from both selected schools were present at the meeting approving the amendments.					
iii.	Both approved amendment applications met or exceeded standard on the state rubric and executive director recommendation reports provide analysis of mission alignment, budget and facility planning, and support for the plan. However, for selected school G, academic outcomes do not support the approval criteria of "academic results provide compelling support for the proposed amendment." The school (K-6 in the 2022-23 school year) had a 2022-23 composite TVAAS (2) below all neighborhood elementary schools and a letter grade (D) below six (6) of seven (7) neighborhood elementary schools; TVAAS and letter grade results were the same or worse than four (4) of five (5) neighborhood middle schools. While					

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commissioners cited clear goals school leadership has set and accountability for academic performance moving forward, per commission meeting video recording, future goals are not a record of results as required by the approval criteria.

- iv. Executive director recommendation reports outline related information for each of the approval criteria outlined in law and decision makers approved each selected amendment in alignment with the recommendation. While not impacting the score, selected school G filed an emergency petition, which is supposed to be used for an “unanticipated extraordinary circumstance” and not for grade level and/or enrollment expansions, per commission amendment appeal rule. The recommendation report cites pressing construction deadlines and an eventual seamless transition for their middle schoolers for the emergency petition. However, a charter school deciding to move forward with construction and financing plans prior to authorizer approval is not unanticipated, particularly when the same request was denied months earlier as part of an appeal process.

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Standard 5b - Renewal Process		0	1	2	3	4
Sub-standards						
i.	Conducts a high-stakes interim review of each school in the fifth year of the current charter term and clearly communicates the results to the school in accordance with Department of Education guidelines.	N/A				
ii.	Provides to each school, in advance of the renewal decision using the timeline specified in state law, a cumulative performance report that: <ul style="list-style-type: none"> a. Summarizes the school's performance record over the charter term; and b. States the authorizer's summative findings concerning the school's performance and its prospects for renewal. 				3	
iii.	Allows the school meaningful opportunity and reasonable time to respond to the cumulative report; to correct the record, if needed; and to present additional evidence regarding its performance.					4
iv.	Requires any school seeking renewal to complete the state's renewal application and follows the renewal application timeline required in state law.					4
Standard Rating						3.66
Evaluative Comments:						
i.	N/A – This sub-standard is N/A, as the authorizer did not authorize either selected school during the fifth year of the charter term.					
ii.	An email regarding selected school I confirms sharing a cumulative performance report that includes academic, financial, and organizational performance outcomes over the charter term and on- and off-track status for each indicator within these areas. However, with a mix of on- and off-track outcomes and no further statement regarding prospects for renewal, the school's prospects for renewal are unclear.					
iii.	An email for selected school I sharing the cumulative performance report, states that the school may address any items deemed off-track in the renewal application. The renewal application further affords the opportunity to more broadly describe the school's academic achievement and growth results over the course of the current charter term.					
iv.	The authorizer's renewal policy and renewal protocol demonstrate that the authorizer requires schools seeking renewal to complete the state's required application and that the process will follow the state's renewal timeline. In the case of selected school I, the cumulative report and renewal application were submitted within three (3) months of commission approval to transition the school and the renewal was approved by February 1, as evidenced by a January 26 recommendation report and commission meeting recording.					

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Standard 5c - Renewal Decisions Based on Merit and Inclusive Evidence		0	1	2	3	4
Sub-standards						
i.	Establishes and clearly communicates a renewal policy which requires the thorough analysis of a school's comprehensive body of objective evidence defined by the performance framework and consistent with the charter agreement and state law, including any policy changes thereto.					4
ii.	Defines and communicates with its schools the criteria for renewal and non-renewal decisions that are consistent with the charter agreement.				3	
iii.	Grants renewal only to schools that have achieved the standards and targets stated in the charter agreement, are organizationally and fiscally viable, and have been faithful to the terms of the contract and applicable law.					4
iv.	Promptly notifies a school of its renewal decision, including written explanation of the evidence-based reasons for the decision and any available rights of legal or administrative appeal through which a school may challenge the authorizer's decision.			2		
v.	Promptly communicates renewal decisions to the school community and public within a time frame that allows parents and students to exercise choices for the upcoming school year.					4
vi.	Does not make renewal decisions on the basis of political or community pressure or solely on promises of future improvement.					4
Standard Rating						3.5
Evaluative Comments:						
i.	The authorizer's renewal policy 3.600 requires an analysis of a school's comprehensive body of evidence (i.e., renewal application, renewal review committee report, the renewal site visit, and the public hearing). The email communication to selected school I sharing the renewal protocol and cumulative performance report, incorporates renewal policy 3.600. School leaders who recently underwent renewal expressed that the process was clear and that the authorizer worked collaboratively with them to manage data constraints.					
ii.	For selected school I, renewal criteria were communicated via the cumulative performance report email and included seven (7) applicable academic performance indicators, two (2) applicable financial performance indicators, and four (4) applicable organizational performance indicators. While the selected school was transitioning from a different authorizer between Years 9 and 10, for other schools in the authorizer's portfolio, it is not clear in charter agreements, the performance framework, or annual reports what level of performance is necessary to be renewed. During the document debrief, the authorizer acknowledged focusing on more recently transitioned renewals and needing to turn to establishing clearer renewal criteria under the current performance framework.					

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- iii. Executive director recommendation reports and the meeting recording for selected schools I and J demonstrate that renewal was granted based on considering the academic, financial, and organizational strengths of the schools and what was in the best interest of the students. In the case of school J, final rubrics for the renewal review team demonstrate the school met or exceeded standard in academic success, operational stability, and financial health.
- iv. An email communication to selected school J demonstrates prompt notification of renewal, yet the communication does not include brief evidence-based factors for the decision. Representatives from selected school I were present at the authorizer's renewal meeting, as confirmed in the meeting recording, but there is no further evidence of providing written communication of the renewal decision.
- v. Authorizer website screenshots demonstrate that the authorizer publicly communicates its meeting minutes and recordings, as well as executive director renewal recommendations and reports via its website.
- vi. Executive director recommendation reports and the meeting recordings support the authorizer making renewal decisions based on a comprehensive body of evidence.

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Standard 5d - Revocation		0	1	2	3	4
Sub-standards						
i.	Establishes and clearly communicates a revocation policy with criteria for charter revocation decisions that are consistent with the charter agreement and state law, including any policy changes thereto.					4
ii.	Revokes a charter during the charter term only if there is clear violation in accordance with the reasons set forth in state law.	N/A				
iii.	Promptly notifies each school of its revocation decision, including written explanation of the reasons for the decision and any available rights of legal or administrative appeal through which a school may challenge the authorizer's decision.	N/A				
iv.	Promptly communicates revocation decisions to the school community and public within a timeframe that allows parents and students to exercise choices for the upcoming school year.	N/A				
v.	Does not make revocation decisions on the basis of political or community pressure.	N/A				
Standard Rating						4
Evaluative Comments:						
i. The authorizer's revocation policy 3.500 contains all the reasons for revocation and timelines in accordance with state law. This aligns with the charter agreement, which also affirms following revocation procedures set forth in law. Quarterly review sample letters from 2024 includes a footnote linking all commission rules and policies available on the authorizer website. ii. This sub-standard is N/A, as the authorizer did not revoke any charter agreements during the review period. iii. This sub-standard is N/A, as the authorizer did not revoke any charter agreements during the review period. iv. This sub-standard is N/A, as the authorizer did not revoke any charter agreements during the review period. v. This sub-standard is N/A, as the authorizer did not revoke any charter agreements during the review period.						

Charter School Authorizer Evaluation 2024

Authorizer: TN Public Charter School Commission

Standard 5e - Closure		0	1	2	3	4
Sub-standards						
i.	Establishes and clearly communicates to schools a closure policy or procedure that is consistent with the charter agreement and requires the authorizer to oversee and work with the school governing board and leadership in carrying out a detailed closure protocol that ensures timely notification to parents; orderly transition of students and student records to new schools; and disposition of school funds, property, and assets in accordance with law.				3	
Standard Rating						3
Evaluative Comments: i. While the authorizer's revocation policy 3.500, available on the authorizer's website and linked in quarterly review letter samples, states that the authorizer will develop a closure protocol in alignment with state law; no such protocol was provided. Additionally, while section 11.3 of agreements for selected schools A-J requires authorizer and school cooperation in the event of closure, including parental notification, records transfer, and disposition of assets and funds, these expectations are not set forth in policy or procedure and there is no mention of requirements regarding personnel records, a school audit, and the location for submission of student and personnel records.						