



Charter School Authorizer Evaluation Report
Knox County Schools
2023

Charter School Authorizer Evaluation 2023

Authorizer: Knox County Schools

About the Charter School Authorizer Evaluations

In 2019, the General Assembly charged the State Board of Education (“State Board”) with conducting periodic evaluations of authorizers to determine authorizer compliance and evaluate quality. Tennessee 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 goal of the 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 2025)
Cohort 2	<ul style="list-style-type: none"> ○ Achievement School District ○ Metro Nashville Public Schools ○ Tennessee Public Charter School Commission

Evaluation Process

The evaluation is based on the 21 standards within the State Board’s Quality Charter Authorizing Standards. The standards are 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. The authorizer’s overall rating is based on the evaluation team’s consideration of evidence weighed against the standards.

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 analyzing and 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 the review of the following evidence: documents submitted by the authorizer (including corresponding documentation for randomly selected schools for 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 a rubric to determine a performance level (see Table 2) between zero (0) and four (4) that best represents the authorizer’s practice.
- 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.
- While the State Board developed its evaluation process to ensure it is fair and consistent across authorizers, evaluation of the twenty-one (21) rubric standards are conducted solely by the evaluation team and represent an independent evaluation of the authorizer’s practices in relation to the standards in the rubric.
- In accordance with State Board rule, the final Evaluation Report will be presented to the State Board for approval at the meeting following the release of the final Evaluation Report to the authorizer.

Table 2. Standard Ratings

0	1	2	3	4
Verbal evidence and/or documentation DOES NOT address <u>or</u> satisfy the standard	Verbal evidence and/or documentation addresses <u>and</u> satisfies LESS THAN 50% of the standard	Documentation addresses MOST <u>but</u> satisfies 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, 2021 - August 31, 2023.

Executive Summary

General Information	
Authorizer:	Knox County Schools (KCS)
About the Authorizer:	KCS is a district authorizer in Knox County. KCS opened its first charter school in 2015, which currently serves approximately 0.75% of the district's students.
# Operational Schools:	One (1) school in the 2022-23 school year
# Students Enrolled:	457 students in the 2022-23 school year
# Approved School(s) in Development: (name and planned opening year)	One (1) school in development <ul style="list-style-type: none"> • Knox Preparatory School (opening in 2024)
Closed Schools: (name and year closed)	Zero (0) schools closed since September 1, 2021
Evaluation Summary	
<p>Identified Areas of Strength</p> <ul style="list-style-type: none"> • The authorizer demonstrates a strong commitment to the quality charter authorizing standards and continuous improvement through ongoing professional development for staff and decision-makers and impactful improvement planning in response to regular evaluation of its work against the authorizing standards. • The authorizer implements a charter application process that is clearly defined, open, well-publicized, and transparent. • The authorizer annually evaluates its schools against a performance framework that defines the targets for academic, financial, and organizational performance. <p>Identified Areas for Growth</p> <ul style="list-style-type: none"> • The authorizer does not define the sources of organizational data within its performance framework that will form the evidence base for ongoing and renewal evaluation. • The authorizer does not have a clear process for utilizing the outcomes of its oversight and evaluation processes to determine when intervention in non-emergency situations is needed. • The authorizer does not clearly define and communicate the criteria for renewal and non-renewal decisions. <p>Required Follow Up Actions</p> <ul style="list-style-type: none"> • Public recognition and highlighting authorizer best practices by the State Board; and • Submission of a self-assessment in the 2024-25 school year, as required for all authorizers during a non-evaluation year. 	

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Overall Ratings Summary:

Standard		Rating (0-4)	Average
1a	Planning and Commitment to Excellence	3.6	3.42
1b	Human Resources	2.66	
1c	Financial Resources	4	
2a	Proposal Information, Questions, and Guidance	4	3.76
2b	Fair, Transparent, Quality-Focused Process	3.25	
2c	Rigorous Approval Criteria	4	
2d	Rigorous Decision Making	3.8	
3a	Charter Agreement Negotiation and Execution	3.5	3.22
3b	Terms, Rights and Responsibilities	3.66	
3c	Performance Standards	2.5	
3d	Provisions for Educational Service Provider (ESP) (if applicable)	N/A	
4a	Performance Evaluation and Compliance Monitoring	3.28	2.85
4b	Respecting School Autonomy	3	
4c	Protecting Student Rights	3	
4d	School Intervention	3	
4e	Public Reporting	2	
5a	Amendments to the Charter Agreement	3	2.87
5b	Renewal Process	N/A	
5c	Renewal Decisions Based on Merit and Inclusive Evidence	2.5	
5d	Revocation	3	
5e	Closure	3	
Overall Rating		3.19 Commendable	

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.				3	
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.				3	
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.					4
Standard Rating						3.6

Evaluative Comments:	
i.	The documentation makes evident that the authorizer held trainings that referenced the quality charter authorizing principles and standards for its decision-makers and leadership (e.g., “Authorizer Evaluations” and “Charter School 101”) and demonstrates understanding and a commitment to the standards for some authorizing staff via a professional learning log with attendees, dates, and training topics listed; however, documentation does not include evidence of all staff funded by the authorizer fee received training.
ii.	Board policy B-220 outlines the requirement for decision-makers to disclose any potential conflicts prior to a vote and to recuse themselves from voting, as necessary, and the documentation included signed conflict of interest (COI) disclosure forms for 8 of the 9 current board members. The policy also requires all supervisory personnel to annually file a COI disclosure statement with the director of schools; however, this documentation, as required in board policy, was not provided for leadership or all personnel funded by the authorizer fee.
iii.	As documented in its authorizer handbook, the authorizer’s mission is: “The Knox County Schools Chartering Authority is dedicated to effective oversight by using high-quality standards and evaluations to ensure charter schools are of exceptional caliber”. Utilizing the results of its 2021 evaluation, the authorizer developed a reflection and improvement tracker and a timeline document to identify and set deadlines for improvement. Additionally, while in draft form, the authorizer has outlined specific goals for improvement in response to its 2021 evaluation and 2022 self-assessment, which align with the tasks documented in the tracker and timeline.
iv.	Board policy I-450 and the authorizer handbook provide details about several policies, processes, and practices, including site visits, charter school applications, renewal, and general reporting timelines, which are aligned to the goals in the draft strategic plan and the charter school

purpose defined in law. Evidence of implementation, such as the site visit feedback reports, the 2021 and 2022 annual reports, and the documentation related to the charter application review for selected school A, demonstrate alignment with policies and processes. School leaders affirmed that the authorizer's processes are streamlined.

- v. The authorizer's decision to approve the charter application for selected school A was based on evidence of the application meeting the standard across indicators, and a recommendation from the review committee demonstrates that the authorizer makes decisions based on evidence, data, and expertise.

Standard 1b – Human Resources Sub-standards	0	1	2	3	4
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.		1			
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.				3	
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					2.66
Evaluative Comments:					
<p>i. While the authorizer’s fee reports document staff with responsibilities that would likely require relevant expertise for all areas essential to charter school oversight, as listed in this sub-standard, only the resumes for the two (2) staff members providing supports for English Learner (EL) and special education (SPED) related responsibilities were provided; therefore, the competence and expertise of its authorizing staff cannot be ascertained.</p> <p>ii. While the authorizer maintains a professional development log which lists attendees, topics, and dates of completed trainings, including onboarding trainings such as “Charter Authorizer Boot Camp”, only some authorizing staff funded fully or partially by the authorizer fee, as noted in the fee reports, are included. Documentation does not demonstrate that all authorizing staff and leadership who support the authorized charter schools receive professional development relevant to authorizing practices.</p> <p>iii. Board meeting minutes, a board retreat agenda, and board presentation materials related to its charter application review demonstrate that the authorizing staff has opportunities to provide input with leadership and decision-makers. School leaders affirmed that they know who to contact with authorizing questions and authorizing staff has opportunities to provide input with leadership and decision-makers as well.</p>					

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:	
i.	The 2020-21 and 2021-22 authorizer fee reports and the FY2023 and FY2024 operating budgets demonstrate that the authorizer determines the financial needs of the office, adjusts as needed, and devotes its \$35,000 in collected fees to fulfilling its authorizing responsibilities. While the 2021-22 fee report shows the authorizer’s expenses exceeding its revenue by \$5,691.70, the narrative and the fee report note that any additional expenses are absorbed by the district as an in-kind contribution. Additionally, the authorizer’s fee reports demonstrate that its expenses meet the requirements for use as outlined in law and rule, including oversight and monitoring, personnel, and support services.
ii.	The authorizer’s 2020-21 and 2021-22 authorizer fee reports and the FY2023 and FY2024 operating budgets detail the authorizer’s efficient and effective use of funds and a screenshot of the authorizer’s website with its fee report posted and a screenshot of the authorizer’s operating budget posted on the Department of Education’s website demonstrate transparency. Additionally, school leaders affirmed that they are aware of how the authorizer spends their collected fees. The narrative also described recent budget revisions between FY23 and FY24 based on an identified need.
iii.	The 2020-21 and 2021-22 authorizer fee reports, which include clear descriptions of expenditures, the amount collected from its school, and appropriate resource allocations, and the public posting of the reports to the authorizer’s website, as evidenced by a screenshot, demonstrate that the authorizer reports its authorizing obligations fulfilled using the authorizer fee in accordance with state law.

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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. 					4
Standard Rating						4
Evaluative Comments:						
i.	The authorizer’s 2022 request for proposals states a chartering mission and priorities aligned to the director of school’s four (4) priorities; the authorizer’s guidance document includes a link to the state’s required application and references use of the state’s scoring rubric; and emails between the authorizer and potential applicants demonstrate some communication regarding timelines and next steps in the process. All documents are posted on the authorizer’s website for public access, as demonstrated by a screenshot. While having no impact on the score, the authorizer should ensure that the required criteria for application review in its authorizer handbook align to the application requirements in State Board Rule. Review committees must not discontinue a review for reasons beyond those stated in State Board Rule to avoid the potential of an application being automatically approved. Additionally, the authorizer should ensure its mission statements match across documents.					

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.			2		
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.				3	
Standard Rating						3.25

Evaluative Comments:

i.	The authorizer’s charter application process is defined in board policy I-450 and aligns with the process used in its review of selected school A’s charter school application. In addition, the authorizer’s handbook, request for proposal, and email communication with the applicant demonstrate that its process is open to all interested applicants, transparent about the scoring criteria, and organized around the state’s required application timelines. The authorizer’s handbook is publicly posted on the authorizer’s website and the narrative states that several other documents, including the request for proposal and application timelines, are also posted on the authorizer’s website.
ii.	Documented email communication between the authorizer and selected school A demonstrates the authorizer’s allowance of sufficient time for each stage of the application process, as required in law and outlined in the authorizer’s board policy. Additionally, a next steps letter to the applicant following application submission outlines remaining stages in the process and evaluation criteria, citing the state rubric for guiding recommendations.
iii.	Board policy I-450 includes the authorizer’s required areas of expertise for the review committee, which include academics, organizational, financial and legal, and board meeting minutes from December 7, 2022 demonstrate the board’s discussion and approval of the review committee that met the requirements outlined in board policy. The board meeting minutes also provided rationale for the external review team member appointments, which demonstrate community knowledge, and the approval of a contract to hire a consultant to support the application review process. However, the evidence did not include documentation, such as resumes or bios, to affirm relevant academic, organizational, financial, and/or legal expertise beyond current roles within the district office.

- iv. Training materials, including a presentation deck and practice application materials, as well as email communication with the review team regarding training prior to the review of selected school A's charter application demonstrate that the authorizer provides training to its review team to ensure consistent evaluation of standards and practices. Additionally, the authorizer requires completion of a COI form from all review team members to ensure the fair and unbiased treatment of applicants. However, slide 15 of the training presentation deck lists "predictors of low performance for a new charter school," including predictors such as "intends to serve at-risk students", "does not name school leader", "intends to use a child-centered instructional model (Montessori, Paideia, etc.)", and "does not plan to hire a CMO." The slides do not include any sources for these predictors and could lead to the unfair treatment of applicants by the review team.

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

<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 use of the state’s charter school application and scoring rubric for selected school A, as required, make evident its use of the rigorous approval criteria cited in this sub-standard.</p> <p>ii. As documented by the email communication with selected school A regarding scheduling the capacity interview, the list of capacity interview questions, and notes from the capacity interview demonstrate that the authorizer requires applicants to participate in a capacity interview and covers topics such as implementing the academic plan, serving special populations, and start-up planning.</p>					

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.				3	
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.					4
v. Does not make application decisions on the basis of political or community pressure.					4
Standard Rating					3.8

Evaluative Comments:	
i.	Board meeting minutes dated April 6, 2023 and April 27, 2023 demonstrate the board’s consideration of the review committee’s recommendation to approve the application for selected school A and affirm its approval. The review committee utilized the state’s application and rubric and a capacity interview to inform its recommendation. Evidence for all these process steps (RFP, emails, completed application and rubric, capacity interview notes, board recommendation slide deck) also align with the authorizer handbook and board policy.
ii.	The authorizer conducts a rigorous evaluation process, as evidenced by the documentation for selected school A, including the review committee’s final consensus rubric and recommendation report, and notes from the capacity interview as well as the decision-makers’ thorough discussion of due diligence documented in board meeting minutes.
iii.	The authorizer demonstrates its application review process and decision-making are free from conflicts of interest through signed COI statements from board members and review committee members involved in the application review and decision for selected school A. However, while COI statements from all review team members were accounted for, the documentation did not include a COI statement from the review facilitator who was responsible for training reviewers, facilitating consensus calls with the review team, and writing the review team report, as documented in a proposal document from the consultant.

- iv. Email communication with the applicant for selected school A and the board resolution detailing the factors that determined the decision, which was delivered three (3) days after the board's vote, demonstrate prompt notification of the authorizer's decisions.
- v. Board meeting minutes dated April 6, 2023 and April 27, 2023 document evidence-based reasons for the decision and affirm that the board does not make application decisions solely on the basis of political or community pressure.

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 original charter agreement and an amended agreement executed in 2021 for selected school C includes signatures from the authorizer and a representative from the charter school, further discussions with the authorizer and school leaders revealed that the signatory for both documents was a non-voting member of the governing body, not the board chair. The documentation did not include signatures from the legally incorporated governing board or documentation of delegated authority.					
ii.	Meeting minutes from selected school C’s governing board in which governing board members discussed and approved the amended charter agreement make evident that the authorizer communicated and ensured mutual understanding and acceptance of the terms of the agreement. School leaders affirmed that, when updating language in the agreement in 2021, the authorizer engaged in significant communication and collaboration with the charter school prior to board approval.					

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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.				3	

Standard Rating

3.66
Evaluative Comments:

- i. The charter agreement for selected school C documents the 10-year term in section 1.2 with the authorizer conducting a high-stakes interim review in the 5th year and producing annual performance reports, as outlined in section 1.4 of the agreement.
- ii. Material terms are defined throughout the agreement for selected school C, such as sections 1.5 and sections 2 through 9, which define enrollment, location, services to students with disabilities and to English learners, staffing, insurance, and governance, and the approved application is incorporated by reference. While having no impact on the score, the charter agreement states that “this charter agreement includes all components of the sponsor’s application, which is incorporated herein by reference and attached hereto as Exhibit 1”; however, exhibit 1 was not provided.
- iii. Section 11 of the charter agreement for selected school C makes evident that the authorizer allows material changes to the agreement, such as changes in school location or enrollment, and does not require a formal process for modifications to non-material terms of the agreement. While having no impact on the score, the agreements must cite all minimum material changes stated in rule and aligned to the state’s required amendment petition to fully satisfy the standard in all future evaluations.
- iv. The charter agreement for selected school C as amended states the rights and responsibilities of the school and authorizer (section 2), states autonomies to which the school is entitled (sections 1.6, 2.2, 9.5, and 11), generally defines the standards for renewal, revocation, and non-renewal, states the terms for operation (i.e., nondiscrimination in enrollment, health and safety laws, staff background checks), states reasonable pre-opening requirements through an attached checklist, states the responsibility of the charter school to admit and serve all students (sections 2.1 and 2.5), and states the collective responsibilities of the charter school and authorizer in the event of closure (section 12.2). However, criteria for intervention and criteria for how documentation informs renewal, revocation, or non-renewal are not included in the charter agreement either by clearly stating the criteria or by incorporating a board policy.
- v. Section 9.2 of the charter agreement for selected school C states that any fee-based services provided by the authorizer shall not be grounds for revocation or non-renewal of the agreement.
- vi. Two (2) separate fee-based service agreements for selected school C were developed by the authorizer for food services and retirement benefits for non-certified employees. Both agreements respect school autonomy (i.e., “Eligible [school] employees shall have the opportunity to participate in the 457 Plan and the Medical Expense Retirement Plan...”) and ensure the charter school is treated equitably compared to district schools (i.e., “Knox County Schools will follow its usual policies, procedures, and practices...”). However, though the authorizer stated in the narrative that there are two (2) fee-based service agreements in place, the submitted service agreement for retirement benefits was not signed by the authorizer or the governing body.

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; 			2		
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. 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; 				3	

<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					2.5
<p>Evaluative Comments:</p> <p>i. While section 1.4 of the charter agreement for selected school C states general academic performance expectations (i.e., “The parties agree that the most critical performance measures are the academic measures...”) and section 2.3 sets expectations for appropriate access for students with disabilities, neither the original nor amended agreement define the objective and verifiable measures of students achievement, performance targets for academic, financial and organizational standards, or incorporate a performance framework as an attachment. Board meeting minutes dated May 4, 2022 documents approval of a revised performance framework; however, the revised framework was not incorporated into the charter agreement.</p> <p>ii. A revised performance framework, as approved by the authorizer at a board meeting on May 4, 2022 and utilized in selected school C’s October 2022 evaluation, meets most of the stated criteria for this sub-standard; however, neither the current performance framework nor any additional documentation defines the sources of organizational data. While having no impact on the score because the authorizer adopted the state’s model performance framework, the framework needs to be updated to include the option to incorporate mission-specific performance measures.</p>					

Standard 3d - Provisions for Educational Service Provider (ESP) (if applicable) Sub-standards	0	1	2	3	4
i. Includes, for any school that contracts with an ESP provider for the management of its educational program, finances, or school operations, provisions within the charter agreement that: ² <ol style="list-style-type: none"> a. Clearly establish the primacy of the charter agreement over the ESP contract; b. Clearly identify the school governing board as the party ultimately responsible for the success or failure of the school, and clearly define the ESP as a vendor of services; c. Prohibit the ESP from selecting, approving, employing, compensating, or serving as school governing board members; d. Provide for sufficient transparency around the spending of public monies; and e. Require all instructional materials, furnishings, and equipment purchased or developed with public funds to be the property of the school, not the ESP, in compliance with state law. 	N/A				
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"> a. The roles and responsibilities of the school governing board and the ESP, including all services to be provided under the contract; b. 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; c. All compensation to be paid by the ESP, including all fees, bonuses, and what such compensation includes or requires; d. Terms of any facility agreement that may be part of the relationship; e. Financial reporting requirements and provisions for the school governing board’s financial oversight; f. 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.

<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:		
<p>This standard is N/A. Selected school C does not contract with an educational service provider.</p>		

Charter School Authorizer Evaluation 2023
Authorizer: Knox County Schools

Standard 4a – Performance Evaluation and Compliance Monitoring		0	1	2	3	4
Sub-standards						
i.	Implements a comprehensive performance accountability and compliance monitoring system that is defined by the charter agreement, outlined in policy, and provides the information necessary to make rigorous and standards-based renewal, revocation, and intervention decisions.			2		
ii.	Defines and communicates to schools the process, methods, and timing of gathering and reporting school performance and compliance data.					4
iii.	Implements an accountability system that effectively streamlines federal, state, and local performance expectations and compliance requirements while protecting schools' legally entitled autonomy and minimizing schools' administrative and reporting burdens.					4
iv.	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.				3	
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.			2		
Standard Rating						3.28
Evaluative Comments:						

- i. The authorizer handbook articulates a comprehensive performance accountability and compliance monitoring system, including annual performance monitoring and reporting using the performance framework, annual site visits, a charter school reporting timeline aligned to the framework, and information related to intervention, interim reviews, revocation, and renewal. However, this system is neither defined in the charter agreement nor included in the board charter school policy. While general grounds for intervention, renewal, and revocation are articulated in the handbook, the documentation does not make evident how outcomes on the performance framework inform these decisions. Additionally, while having no impact on the score, the authorizer's board policy should reference state law rather than the Tennessee Public Charter School Commission.
- ii. Weekly email communication with selected school F, the authorizer handbook, and the compliance monitoring timeline serve as evidence of the authorizer defining and communicating the process, methods, and timing of gathering school performance and compliance data. Additionally, site visit feedback reports and an interview with school leaders affirmed that the authorizer defines and communicates reporting expectations.
- iii. As documented in the authorizer handbook (pages 11-13, 18, 19), the authorizer implements an accountability system that streamlines performance expectations and compliance requirements. In addition, the authorizer is piloting a tracking method this school year that is aligned to the expectations outlined in the authorizer handbook and utilizes opportunities throughout the year, such as through email communication, weekly internal staff check-ins, and site visits, to ensure it is protecting school autonomy and minimizing administrative and reporting burdens. School leaders affirmed that the authorizer holds its school accountable and has made changes to further streamline requirements.
- iv. While monthly meetings with selected school F may be used as an opportunity for informal feedback, the authorizer did not provide evidence of a formal feedback structure that is used to inform technical guidance needs. The authorizer does however provide technical assistance through email, as requested, and through reminders and resources shared via a weekly newsletter.
- v. Site visit feedback reports for selected school F demonstrate that the authorizer conducts at least one (1) formal on-site review annually and provides schools with a report summarizing the review and Appendix B of the authorizer handbook states that the purpose for the visit is to "[...] gather information defined in the Performance Framework", which informs the school's annual evaluation.
- vi. As documented in site visit protocols included as Appendix B of the authorizer handbook, the authorizer conducts two (2) site visits per year and details the frequency, purposes, and methods for data collection. Email communication and the authorizer handbook demonstrate that the authorizer communicates the purpose and schedules the visit in advance in accordance with the charter agreement (section 1.4) while respecting school autonomy and avoiding operational interference. While having no impact on the score, the authorizer should consider the level of feedback that is provided after a site visit to ensure it is not deemed as being directive or too specific and, therefore, infringes upon the charter school's autonomy.
- vii. Meeting agendas between the authorizer and selected school F, performance reviews signed by both parties, and the authorizer's 2021 and 2022 annual reports make evident that the authorizer evaluates schools annually. However, the 2021 report does not include essential compliance requirements and there is no evidence of communicating the 2021 report with the school. Additionally, there was no evidence that the 2021 or 2022 reports were shared with the school's governing board.

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.				3	
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.			2		
Standard Rating						3

Evaluative Comments:	
i.	An email regarding the monthly meeting agenda, which allows for collaboration on the topics discussed, and emails regarding offers to opt into district-wide trainings demonstrate that the authorizer respects the school's authority over its day-to-day operations. School leaders affirmed that the authorizer's communication and feedback is respectful of the charter school's authority in its educational decisions and choices.
ii.	While the authorizer handbook contains an annual reporting timeline, which is shared with schools via email at the beginning of the year, and submissions generally align with the performance framework, there is not sufficient detail on due dates, what specifically is needed in all instances (i.e., late September, evidence of compliance with educational requirements, evidence of compliance of reporting requirements), or how the requirements align to and inform outcomes on the performance framework.
iii.	Notes from weekly internal staff check-ins and the decision to pilot a new compliance tracking system demonstrate the authorizer's ongoing review of compliance requirements at the start of the 2022-23 school year; however, the documentation does not include evidence of regular review prior to the start of the 2022-23 school year or evidence of the authorizer evaluating the potential to increase school autonomy.

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.				3	
iii.	Ensures clarity in the roles and responsibilities of all parties involved in serving students with disabilities.				3	
iv.	Ensures that schools' student discipline policies and actions are legal, fair, and equitable and that no student is suspended, expelled, or counseled out of a school outside of that process, and that schools have a clear process for addressing parent/community grievances.				3	
Standard Rating						3

Evaluative Comments:	
i.	As documented by an email from selected school F to the authorizer, the reporting requirements table in the authorizer handbook (pg. 18), and an indicator on the authorizer's performance framework, the authorizer uses the annual submission of a lottery certification to ensure schools admit students through a selection process in accordance with law. However, the documentation does not include evidence of additional compliance reviews beyond the lottery certification, such as reviewing the charter school's enrollment application and enrollment requirements to ensure alignment with law.
ii.	Site visit protocols and feedback reports document the authorizer's review of selected school F's processes for identifying student service needs and ensuring the rights of all students, including for those who receive special education services, who are English learners, who receive gifted services, who are migrants, and who are homeless. In addition, the authorizer discussed in its document debrief, and school leaders affirmed, that optional special populations trainings and weekly supports are offered, though documented evidence of these practices was not provided. Additionally, while the authorizer discussed conducting document reviews for special populations of students, such as individualized education plans, 504 plans for special education students, and individualized learning plans for English learners, no documentation affirming these actions was provided. Furthermore, the documentation did not include evidence that the authorizer ensures the charter school provides appropriate services for students who are in foster care or who are at-risk.

- iii. Section 2.3 of the charter agreement for selected school F outlines the specific responsibilities for the authorizer (i.e., oversee procedural compliance, collaborate with the school in the identification and referral process and in conducting initial evaluations, etc.) and the charter school (i.e., special education services will be delivered by individual or agencies licensed to provide special education services, have a qualified special education coordinator, etc.) in serving students with disabilities. However, while the authorizer affirmed during the document debrief that its school is supported through regular meetings with special education staff, the evidence does not include clear documentation of the roles and responsibilities that are used in practice and school leaders shared that the roles and responsibilities of each party are unclear.
- iv. The authorizer handbook's reporting timeline makes evident that the authorizer requires annual submission of the student handbook, site visit documentation includes notes indicating time for discussing discipline and school culture, and the performance framework includes indicators on suspension and discipline practices which require annual review. However, evidence of reviewing the student handbook submitted by the school, such as through an annual policy review, was not provided.

Standard 4d - School Intervention		0	1	2	3	4
Sub-standards						
i.	Establishes and clearly communicates to schools at the outset an intervention and problem-solving policy that states the general conditions that may trigger intervention and the types of actions and consequences that may ensue.				3	
ii.	Utilizes ongoing oversight and evaluation processes to determine when intervention in non-emergency situations is needed.				3	
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.	N/A				
iv.	Allows schools reasonable time and opportunity for remediation in non-emergency situations.	N/A				
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.	N/A				
Standard Rating						3
Evaluative Comments:						
i.	The authorizer’s board policy AP-I-450 outlines its intervention process that states the general conditions that may trigger intervention (i.e., minor infractions, weak performance, underperforming, etc.) and the types of actions that may ensue (i.e., notice of deficiency, notice of probation, revocation review, etc.). Though the policy is posted on the authorizer’s website and is included in the authorizer handbook, school leaders shared that they are unfamiliar with any intervention process or policy.					
ii.	The authorizer handbook, site visit reports, compliance monitoring timeline, and 2021 and 2022 annual reports demonstrate ongoing oversight and evaluation. While there have been no documented issues of non-compliance beyond an email communication regarding a retirement audit during the review term, as confirmed by the authorizer and school leaders, selected school F’s performance framework outcomes from 2021 and 2022 documents the same seven (7) academic indicators scoring “does not meet standard” or “falls far below” without evidence of any follow up or documented intervention from the authorizer. During the document debrief, the authorizer shared that low performance outcomes would be discussed during an annual meeting with its charter school to review results on the performance framework, though evidence of this was not provided. Additionally, neither the submitted documentation nor the document debrief with the authorizer revealed a clear process for determining when performance framework outcomes would trigger intervention.					
iii.	N/A – The authorizer did not implement its intervention process during the review term.					
iv.	N/A – The authorizer did not implement its intervention process during the review term.					
v.	N/A – The authorizer did not implement its intervention process during the review term.					

Standard 4e - Public Reporting Sub-standards	0	1	2	3	4
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. 			2		
Standard Rating					2
Evaluative Comments:					
i. The 2021 and 2022 annual reports, email communication, and screenshots of the authorizer’s website demonstrate that the authorizer annually produces and publicly communicates an authorizer report. However, the reports do not include reflections on the authorizer’s performance in meeting its goals and do not align with a framework set forth in the charter agreement. Additionally, there is no evidence of directly communicating the authorizer reports to the school.					

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.				3	
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.	N/A				
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.	N/A				
iv.	Does not make amendment decisions on the basis of political or community pressure.	N/A				
Standard Rating						3
Evaluative Comments:						
i.	Section 11 of the charter agreement for selected school C documents the charter school’s right to amend the charter agreement and the conditions in which a formal amendment process would be required, and email communication demonstrates that the authorizer communicates the state’s timeline and application for charter schools considering an amendment. While the right to amend the agreement is included in board policy I-450 (“Should adjustments or amendments to the Charter Agreement be needed, the governing body may apply to the authorizer for any amendment to or deviation from the Charter Agreement”), the process outlined in the authorizer handbook is limited, and school leaders were unable to clearly articulate a process to amend the agreement.					
ii.	N/A – The authorizer did not receive an amendment petition during the review term.					
iii.	N/A – The authorizer did not receive an amendment petition during the review term.					
iv.	N/A – The authorizer did not receive an amendment petition during the review term.					

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. 			N/A		
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.			N/A		
iv.	Requires any school seeking renewal to complete the state’s renewal application and follows the renewal application timeline required in state law.			N/A		
Standard Rating						N/A
Evaluative Comments:						
i.	N/A – The authorizer did not have a school in the renewal process during the review term. In the spirit of continuous improvement, the State Board reviewed the interim review documentation submitted by the authorizer and noted that outcomes presented in the interim report did not clearly connect to the charter school’s annual review on the performance framework and the documentation lacked evidence of clearly communicating the results to the charter school.					
ii.	N/A – The authorizer did not have a school in the renewal process during the review term.					
iii.	N/A – The authorizer did not have a school in the renewal process during the review term.					
iv.	N/A – The authorizer did not have a school in the renewal process during the review term.					

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.				3	
ii.	Defines and communicates with its schools the criteria for renewal and non-renewal decisions that are consistent with the charter agreement.			2		
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.	N/A				
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.	N/A				
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.	N/A				
vi.	Does not make renewal decisions on the basis of political or community pressure or solely on promises of future improvement.	N/A				
Standard Rating						2.5

Evaluative Comments:	
i.	The authorizer has a renewal policy incorporated into board policy I-450 that is consistent with the charter agreement for selected school F. Email communication and meeting agendas document that the authorizer communicates additional details about its renewal policy, including access to the state’s renewal application, general criteria, a connection to the body of evidence defined by the performance framework, and a timeline that’s consistent with law. Additionally, school leaders could articulate a general process for renewal and stated that they have already started meeting with authorizing staff to discuss their upcoming renewal. However, neither the policy nor handbook reference use of any data collected beyond the performance framework, such as the interim review, cumulative report, or renewal application, or how the comprehensive evidence will be analyzed.
ii.	While the authorizer handbook details general criteria for renewal, such as meeting academic goals, adherence to mission and charter design, and fiscal stability, the handbook does not define specific metrics or criteria. Additionally, board policy does not fully align with what is in law, which requires renewals to also include a review of a school’s annual progress reports and the renewal application. School leaders also shared that, though hopeful that their annual renewal status that is included in each annual report would be considered, they were uncertain what criteria would be used to inform the renewal decision.

- iii. N/A – The authorizer did not have a school in the renewal process during the review term.
- iv. N/A – The authorizer did not have a school in the renewal process during the review term.
- v. N/A – The authorizer did not have a school in the renewal process during the review term.
- vi. N/A – The authorizer did not have a school in the renewal process during the review term.

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.				3	
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						3
Evaluative Comments:						
i.	While board policy I-450 and the authorizer handbook list reasons for revocation and both documents are publicly available on the authorizer's website, as made evident by a screenshot, the stated reasons are inconsistent across the two (2) documents and do not exactly align with the reasons for revocation in law. While having no impact on the score, it is recommended that the requirement of authorizers to notify a school of the intent to revoke 30 days prior to any decision is included in the board policy.					
ii.	N/A – The authorizer did not implement a revocation during the review term.					
iii.	N/A – The authorizer did not implement a revocation during the review term.					
iv.	N/A – The authorizer did not implement a revocation during the review term.					
v.	N/A – The authorizer did not implement a revocation during the review term.					

Standard 5e - Closure Sub-standards	0	1	2	3	4
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. Section 12.2 of the charter agreement acknowledges the obligation to fulfill all areas outlined in this substandard. The authorizer handbook, which is sent to schools annually and posted on the authorizer’s website, states that the authorizer will follow the closure action plan available on the TDOE’s website in the event of a closure, though the specific requirements are not as clearly stated in the handbook as they are in the charter agreement. The authorizer did not oversee a school closure during the review term.					