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SARA H. MORRISON
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February 25, 2025
Shereka Roby-Grant, Director of Charter Schools
Metropolitan Nashville Public Schools
2601 Bransford Avenue
Nashville, TN 37204
VIA EMAIL: Shereka.Roby@mnps.org

Ms. Roby-Grant,

On behalf of the Tennessee State Board of Education (State Board), I am writing to inform you of the State Board's decision on February 21, 2025 to approve Metro Nashville Public Schools' (MNPS) overall rating of **"Satisfactory"** and score of **2.9 out of 4.0** on its [2024 Authorizer Evaluation](#).

In accordance with State Board Rule [0520-14-01-.08](#) and State Board Policy [6.113 – Charter School Authorizer Evaluations](#), an overall rating of "Satisfactory" shall result in the following corresponding action:

- Submission of a self-assessment during the non-evaluation year.

Self-Assessment Requirements:

As required for all authorizers in a non-evaluation year, MNPS must complete and submit a [self-assessment](#) by January 1, 2026. The self-assessment should consider the feedback received as part of the 2024 evaluation and highlight progress made since the final evaluation report.

Should you have any questions regarding this notice, please contact Ali Reid at Ali.Reid@tn.gov or (615) 837-5142.

Sincerely,

A handwritten signature in blue ink, appearing to read "Sara Morrison".

Sara Morrison, Ed.D.
Executive Director

SM:AR

Enclosure: 2024 TN Authorizer Evaluation_MNPS Evaluation Report FINAL

CC: Dr. Adrienne Battle, Director of Schools, Adrienne.Battle@mnps.org
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Charter School Authorizer Evaluation Report
Metro Nashville Public Schools
2024

Charter School Authorizer Evaluation 2024

Authorizer: Metro Nashville Public 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 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	○ Hamilton County Schools ○ Knox County Schools ○ Memphis-Shelby County Schools ○ Rutherford County Schools (beginning in the 2025-26 school year)
Cohort 2	○ 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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Authorizer: Metro Nashville Public Schools

Executive Summary

General Information	
Authorizer:	Metro Nashville Public Schools ("MNPS")
About the Authorizer:	MNPS is a district authorizer in Davidson County. MNPS's first charter school opened in 2007 and its charter schools currently serve approximately 16% of the district's students.
# Operational Schools:	27 schools in the 2023-24 school year
# Students Enrolled:	13,008 students in the 2023-24 school year
# Approved School(s) in Development:	0 schools in development
Closed Schools:	0 schools closed since September 1, 2022
Evaluation Summary	
Identified Areas of Strength - The authorizer has made positive improvements to its charter agreements by updating the terms of its agreements to better align with the quality authorizing standards and establishing a process in which the authorizer provides time for discussion of and mutual agreement to these terms with its authorized charter schools. - The authorizer refrains from directing or participating in education decisions or choices that are within the purview of its charter schools. - The authorizer promptly notifies new charter school applicants and existing operators of its authorizing decisions in writing and documents the factors that determined the decision.	
Identified Areas for Growth - The authorizer's charter application review process lacks a comprehensive review of the application, does not involve members of its authorizing staff with the greatest understanding of charter school autonomy and accountability, and four (4) of its seven (7) charter application decisions were overturned by the appellate body during the review term. - The authorizer has not defined or communicated renewal criteria to its charter schools and the lack of renewal criteria impacted a decision by the authorizer to deny renewal for one (1) of its charter schools. - The authorizer lacks a board-approved intervention policy, as required by state law².	
Required Follow Up Actions Submission of a self-assessment in the 2025-26 school year, as required for all authorizers during a non-evaluation year.	

² Tennessee Code Annotated § 49-13-122(c)

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Authorizer: Metro Nashville Public Schools

Overall Ratings Summary

Standard		Rating (0-4)	Average
1a	Planning and Commitment to Excellence	2	2.67
1b	Human Resources	2.67	
1c	Financial Resources	3.33	
2a	Proposal Information, Questions, and Guidance	3	3.25
2b	Fair, Transparent, Quality-Focused Process	3	
2c	Rigorous Approval Criteria	4	
2d	Rigorous Decision Making	3	
3a	Charter Agreement Negotiation and Execution	3.5	3.39
3b	Terms, Rights and Responsibilities	3.67	
3c	Performance Standards	3	
3d	Provisions for Educational Service Provider (ESP) (if applicable)	N/A	
4a	Performance Evaluation and Compliance Monitoring	2.57	2.62
4b	Respecting School Autonomy	3	
4c	Protecting Student Rights	2.75	
4d	School Intervention	2.8	
4e	Public Reporting	2	
5a	Amendments to the Charter Agreement	4	2.88
5b	Renewal Process	2.25	
5c	Renewal Decisions Based on Merit and Inclusive Evidence	3.16	
5d	Revocation	1	
5e	Closure	4	
Overall Rating		2.9 Satisfactory	

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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.			2		
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.			2		
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.			2		
iv.	Implements policies, processes, and practices that streamline and systematize its work toward stated goals and executes its duties efficiently.			2		
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.			2		
Standard Rating						2
Evaluative Comments:						
i.	An email between authorizing staff and the board's liaison, staff meeting agendas with updates related to the authorizer's evaluation, and an onboarding agenda for a new member of the authorizing staff that included review the authorizer's 2022 evaluation results shows an attempt to inform decision-makers and staff of the quality charter authorizing principles and standards; however, the documentation did not include evidence of ensuring an understanding of the principles and standards for decision-makers, leadership, or all authorizing staff throughout the review term, such as trainings related to quality authorizing.					
ii.	While the documentation included evidence of the core and extended authorizing staff completing a conflict of interest ("COI") form, there were no completed forms submitted for leadership, such as the director of schools, who are partially funded by the authorizer fee. Additionally, while an email between authorizing staff and leadership states that COI forms are maintained by the election commission, no further evidence regarding the content of these forms, such as in a board policy, or evidence of all decision-makers completing the form was provided.					
iii.	The authorizer states a clear mission to "authorize excellent public schools that change lives" in its authorizing handbook. Though the authorizer's narrative states that the authorizing staff "implemented an improvement plan" based on feedback from its 2022 evaluation, no documented evidence of this improvement plan or any related goals was provided.					
iv.	Board-approved application and monitoring policies, site visit documentation, authorizer's handbook, and feedback forms provide evidence of established policies and processes; however, intervention and revocation policies are missing, processes are not streamlined, and there is inconsistent implementation of its systems and practices, as cited in standard 4 of this evaluation. Additionally, based on presentation materials from					

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a 2024-25 school year kick-off meeting, the authorizer presented four (4) goals for its portfolio that are mostly related to the academic performance of its charter schools, but these goals were not in place for most of the review term.

- v. While decisions related to its new charter applications and a renewal for the selected schools document the authorizer considering evidence, data and expertise provided by its review teams, the decisions were made without clearly stated approval criteria or consideration of the complete body of evidence. Additionally, five (5) of the authorizer's eight (8) authorizing decisions (seven new charter applications and one renewal application) that were appealed to the appellate body during the review term were overturned due to evidence demonstrating that the schools were likely to result in positive student outcomes.

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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.			2		
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.			2		
Standard Rating						2.67
Evaluative Comments:						
i.	Resumes, job descriptions, application review committees, email communication between authorizing staff and the legal department, and an organizational chart that includes core and extended authorizing staff members, demonstrates the authorizer enlists competent staff with relevant expertise in all areas essential to charter school oversight.					
ii.	Onboarding materials, a staff professional development tracker with session topics listed, and registration invoices for a national and state-level charter conference that occurred within the review term demonstrates an on-going commitment to developing and retaining most of its core authorizing staff; however, dates are not always provided to affirm when the development occurred, and the documentation lacked evidence of participation for all core and extended authorizing staff either fully or partially funded by the authorizing fee, including leadership.					
iii.	Charter newsletters, handbooks, annual kick-off meetings, and end-of-year meetings that outline roles and responsibilities of authorizing staff demonstrate the authorizer ensures authorizing is visible. School leaders expressed confidence in knowing who to reach out to with authorizing questions and cited instances in which the authorizing staff has engaged with leadership regarding charter-related issues. However, evidence of input with decision-makers is minimal as most of the documentation involves communication between authorizing staff and the board's liaison. Further, a video from a board meeting documents decision-makers limiting staff input to clarifying information only following a presentation regarding the findings of a review committee.					

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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.			2		
iii.	Annually reports the authorizing obligations fulfilled using the authorizer fee in accordance with state law.					4
Standard Rating						3.33
Evaluative Comments:						
i.	Authorizer fee reports from the 2021-22 and 2022-23 school years and authorizing office budgets for FY23 and FY24 document the authorizer's use of the \$35,000 fee collected annually from each of its authorized charter school to fulfill authorizing responsibilities, including staffing, application review consultants, and support services, in accordance with state law ³ .					
ii.	Authorizer fee reports document the authorizer's effective use of its collected funds to cover authorizer obligations and the authorizer's narrative outlines a process for efficiently spending the funds. However, the 2021-22 school year report notes a total expenditure that exceeds revenue by \$16,711.97, without identifying the funding source. Additionally, the documentation does not include evidence of transparently publishing the fee reports to its website or sharing the reports with its charter schools. School leaders confirmed that they have not received any authorizer fee reports or budgets from the authorizer and were not aware of how their funds were spent.					
iii.	Email communication with the Tennessee Department of Education and authorizer fee reports submitted during the review term were prepared on the state's required template and provide evidence of the authorizer annually reporting its authorizing obligations fulfilled using the authorizer fee.					

³ Tennessee Code Annotated § 49-13-128

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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: 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.				3	
Standard Rating						3
Evaluative Comments: i. The authorizer's handbook includes information regarding the charter application process, including the authorizer's mission and links to the state's required application form and scoring rubric, and is publicly posted on its website. Additionally, the handbook includes specific timelines for the current application review cycle, including tentative dates for board decisions on the initial and amended application reviews, and details about each step in the review process, including the requirement for applicants to use the state's application form, the authorizer's use of the state's scoring rubric, and participation in a capacity interview with the review team. However, the handbook also includes information that conflicts with state law and/or State Board Rule and must be updated, such as setting an application deadline that is earlier than 11:59pm Central on February 1st, stating that the board's decision will be determined 90 days from February 1st rather than from receipt of an application, and directing applicants to appeal the board's decision via the State Board rather than the Tennessee Public Charter School Commission.						

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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.				3	
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.				3	
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.			2		
Standard Rating						3
Evaluative Comments:						
i.	The authorizer's handbook outlines an application process that aligns with its board policy 1.900 and is not restrictive, is mostly organized around the state's required timelines (with exception of conflicting details cited in standard 2a) and is publicized via the authorizer's website. However, the board policy is not transparent about the scoring criteria, only noting "recommendations shall be compliant with the board's vision for the use of charter schools as a district component of meeting district goals" without defining its vision or goals and without citing use of the state's required scoring rubric as its criteria for review, as required by state law ⁴ and State Board rule ⁵ .					
ii.	Email communication with the sponsors of selected schools A and B from each stage of the application process (i.e., receipt of the letter of intent, notice of the findings report and upcoming board vote, board decision notifications) with deadlines and next steps demonstrate that the authorizer allows sufficient time for each stage of the process.					
iii.	Review committee lists with corresponding job titles (i.e., legal, executive director of facility maintenance, executive director of exceptional education) and a biography for one (1) external reviewer for selected schools A and B document the authorizer's use of competent evaluators with relevant academic, organizational, financial, and legal expertise to review its charter applications. However, while the review teams for the selected schools included extended authorizing team members who provide charters with supports specifically related to special education and English learners, no one from its core authorizing team, who have the strongest understanding of charter school autonomy and accountability, served on					

⁴ Tennessee Code Annotated § 49-13-107

⁵ State Board Rule 0520-14-01-.01

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either review team. When asked about this decision, the authorizer stated that it was to avoid “conflicts”, though it was unclear how each new application would decidedly pose a conflict for the core authorizing team but not the extended team, all of whom have responsibilities in supporting its current portfolio of charter schools. While having no impact on the score, it is recommended that the authorizer involve multiple external reviewers without direct ties to the district.

- iv. While training presentation materials for the application review of selected schools A and B make evident that the authorizer provides orientation to reviewers and requires reviewers to complete a conflict-of-interest form prior to reviewing an application to ensure fair, unbiased treatment of applicants, neither the presentation nor other documentation demonstrates how the authorizer ensures consistent evaluation of standards, such as through group norming or application review practice with the review teams. Additionally, while attendance logs for selected school A’s reviewer training documents that all reviewers attended, attendance logs for selected school B document that only six (6) of the 10 reviewers attended their training.

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Standard 2c - Rigorous Approval Criteria Sub-standards	0	1	2	3	4
i. Utilizes the state's required application and rubric which: 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: 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: 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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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 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. d) Considers diverse educational philosophies and approaches. 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.					
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.					4
Standard Rating					4
Evaluative Comments: i. The authorizer's review of applications submitted on the state's required form and use of the state's and scoring rubric for selected schools A and B, as required by state law, make evident its use of rigorous approval criteria required by this sub-standard. ii. As demonstrated by the authorizer's capacity interview documentation for selected schools A and B, including attendance logs, email communication with the applicants, interview questions, and notes, the authorizer requires applicants to participate in a capacity interview to demonstrate evidence of capacity to execute its plan. Topics discussed during the capacity interviews included implementing the academic plan, recruiting staff, and managing the governing board. Attendance logs affirm those who will implement the plan were present at the capacity interviews.					

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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.				3	
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.			2		
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.			2		
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
Evaluative Comments:						

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- i. Decision notices for the initial and amended application review for selected schools A and B demonstrate that the authorizer's appointed review team utilized the state's required scoring rubric to develop summary reports with overall ratings and supporting evidence provided. However, the decision for one (1) selected school was overturned by the appellate body, which found the applicant meeting standard in all three (3) areas of the scoring rubric. The appellate body's review set forth information related to facilities, demand, schools in the proposed neighborhood, and financial management that refuted authorizer findings.
- ii. Reviewer rubrics, capacity interview notes, and summary reports for selected schools A and B demonstrate that the authorizer's review team conducts a review of the written application and a substantive in-person interview. However, the reviewer rubrics included blank sections, sections without evaluative comments, and/or comments without rating. Additionally, the financial section was completed by only one (1) reviewer, which may prevent sufficient consideration of applicant's experience and capacity necessary to successfully implement its plan. Evidence indicates that no reviewer conducted a comprehensive review of the entire application. Beyond this, board presentation materials lacked evidence of a complete evaluation that weighs the review committee's findings with due diligence conducted by staff, which can lead to uncertainty among applicants regarding how evidence is considered. In an interview with school leaders, participants shared that the process of staff providing a comprehensive recommendation on each application changed without explanation.
- iii. While training materials, a blank COI form for review team members, and email documentation between authorizing staff and the legal department regarding an employee's disclosure of a potential conflict sets the expectation that all reviewers are free from conflicts, the documentation did not include signed COI statements for 15 members of the review teams for selected schools A and B. Additionally, the completed COI statements do not include the names of the sponsor or governing body members making it difficult to ascertain if reviewers were able to fully consider all potential or perceived conflicts of interest for the applications they would be evaluating. Furthermore, as noted in standard 1aii, the documentation does not include evidence of COI forms or a policy that requires decision-makers to disclosure of any potential conflicts with applicants.
- iv. Decision letters dated one (1) day after each board vote for the initial and amended application reviews of selected schools A and B document the authorizer's prompt notification of its decision. The letters explain applicant rights to revise the initial application and appeal the final decision, and the decision notifications include a list of factors that determined the reason for denial, including negative fiscal impact to the district and proposed curricula that's prohibited in state law.
- v. The authorizer's board reports and recordings of board meetings for selected schools A and B do not provide evidence of making application decisions solely based on 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 executed charter agreement for selected school D includes signatures from the authorizer's board chair and charter school's governing board chair and demonstrates the authorizer's intentional efforts to ensure alignment with this sub-standard, the original charter agreement and a 2023 amendment for selected school C is signed by the charter school's executive director rather than the governing board chair and no documentation of delegated authority was provided, as required by this sub-standard.					
ii.	Email communication between the authorizer and the executive directors for selected schools C and D document the authorizer's practice of providing its charter schools with the opportunity to review and propose changes to the agreement prior to execution.					

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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: 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

3.67
Evaluative Comments:

- i. The charter agreement for selected school C documents the 10-year term in section 1.2 and states the authorizer's responsibility to annually report on the school's progress in relation to the performance framework and to conduct an interim review during the fifth (5th) year of the charter term in section 1.4. The charter agreement for selected school D defines the 10-year term in section 1.2 and cites the responsibility to produce an annual report and conduct an interim review during the fifth (5th) year in section 1.3.
- ii. Material terms are defined throughout the charter agreements for selected schools C and D, including requirements regarding enrollment, location, services to students with disabilities and to English learners, staffing, insurance, and governance. Additionally, section 1.1 of each agreement states that the approved application is incorporated by reference. While having no impact on the score, both charter agreements incorporate the approved application by reference and as an exhibit of the agreement, though only one method is necessary.
- iii. Section 10 of the charter agreements for selected schools C and D allow for and require approval of material changes to the agreement and includes a list of changes that do not require an amendment, such as changes to the budget or school leader. The authorizer further explained that proposed changes to the agreement are first discussed with the legal department to determine if it rises to the level of a material change before determining next steps for amending a charter agreement. While having no impact on the score, the agreements must cite, at a minimum, all material changes required in Tennessee Public Charter School Commission Rule to fully satisfy this sub-standard in all future evaluations.
- iv. While most of the seven (7) areas of the sub-standard are addressed in the charter agreements for selected schools C and D, the agreements do not define the performance standards, criteria, and conditions for renewal or intervention or state the pre-opening requirements (only required for selected school C as it is still in its first charter term). Additionally, section 2.2 of the agreement for selected school D states that the academic program shall be operated in accordance with the LEA's policies, which, without further explanation regarding the LEA policies must be followed, may infringe on charter autonomy.
- v. Section 9.2 of the charter agreements for selected schools C and D affirm that the parties may enter into separate fee-for-services agreements and that entering "such an agreement shall not be grounds for revocation or non-renewal".
- vi. Food service agreements between the authorizer and selected schools C and D document that the authorizer develops a separate agreement for its fee-based services, which respects school autonomy. However, neither the documentation nor the authorizer was able to describe a process for ensuring any service agreements between the authorizer and the charter school are equitable when compared to other district schools, as required by this sub-standard.

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Standard 3c - Performance Standards		0	1	2	3	4
Sub-standards						
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: - Objective and verifiable measures of student achievement as the primary measure of school quality, in accordance with state law; - 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; - Expectations for appropriate access, education, support services, and outcomes for students with disabilities;				3	
ii.	The performance framework includes clearly defined and measurable indicators, measures, metrics, and targets that: - Academic Performance - Define the sources of academic data that will form the evidence base for ongoing and renewal evaluation; - Set expectations for student academic achievement status or proficiency, including comparative proficiency; - Set expectations for student academic growth, including adequacy of growth toward state standards; - Incorporate state and federal accountability systems, including state grading and/or rating systems; - Set expectations for postsecondary readiness, including graduation rates (for high schools); and - 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). - Financial Performance - 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	

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2. Enable the authorizer to monitor and evaluate the school's financial stability and viability based on short-term performance; and 3. Enable the authorizer to monitor and evaluate the school's long-term financial sustainability. c) Organizational Performance 1. Define the sources of organizational data that will form the evidence base for ongoing and renewal evaluation; 2. Define the essential elements of the educational program for which the authorizer will hold the school accountable; 3. Define financial management and oversight standards based on generally accepted accounting principles; 4. Hold school governing boards accountable for meeting statutory and board-established operating and reporting requirements; 5. Ensure school compliance with student and employee rights and obligations; and 6. Establish expectations related to the school environment, including health and safety, transportation, facilities, and appropriate handling of records.					
Standard Rating					3
Evaluative Comments: i. Though the charter agreements for selected schools C and D cite the performance framework as an exhibit to the agreements, the exhibit for selected school C was not provided. While having no impact on the score, the authorizer should cross reference its cited agreements against the names of its attachments as the performance framework for selected school D is referenced as "Exhibit 3" in the agreement but is titled as "Exhibit 2" in the attachment. ii. As made evident through the incorporated performance framework for selected school D and documentation of the annual evaluation of its schools using this framework, the authorizer's performance framework meets most of the stated academic, financial, and organizational performance criteria for this sub-standard; however, neither the performance framework, annual reports, nor any additional documentation defines the sources of its financial or 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 and sets expectations for graduation.					

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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: ⁶ - 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: - 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		

⁶ 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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vii. 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; viii. Provisions for contract termination; and ix. 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: N/A – This standard is N/A as neither of the selected schools currently contracts with an ESP.	

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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.				3	
ii.	Defines and communicates to schools the process, methods, and timing of gathering and reporting school performance and compliance data.				3	
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.			2		
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.				3	
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.		1			
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						2.57
Evaluative Comments:						
i.	Section 1.6 of the charter agreement for selected school E and section 1.4 of the charter agreement for selected school F grants the authorizer broad oversight authority including collecting compliance-related documentation, conducting school visits, examining records, and interviewing employees, governing body members, students, and families. Appendix B of the authorizer’s handbook includes board policy 1.901 which loosely outlines authorizing oversight responsibilities aligned to the charter agreement and completed annual evaluations for the selected schools provide evidence of					

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- the authorizer collecting information. However, while there is evidence of some accountability and compliance monitoring occurring and notices of concern demonstrate that systems can inform intervention, it is unclear how the authorizer's system informs renewal or revocation decisions.
- ii. The authorizer's handbook communicates some of its reporting requirements, such as annual reports and documentation for exiting students. A screenshot of a filesharing platform provides the method for collects additional compliance-related documentation, such as lottery certifications, governing board trainings, and safety drills. Materials for an annual kick-off meeting and weekly email newsletters communicate the timing of gathering reporting requirements, such as licensure audit timelines and formal site visits. However, some documents do not include submission timelines and reporting requirements are documented differently across multiple forms of communication.
 - iii. While the documentation includes evidence of setting some federal, state, and local performance expectations and compliance requirements (i.e., annual reporting, documentation for special populations), the authorizer's accountability system is not streamlined as there are multiple documents outlining different requirements. Surveys collected by the authorizer following the August 2024 kick-off meeting reiterate a desire for a more consolidated form of communicating forthcoming deadlines in advance. School leaders also noted that, while requirements are often communicated via weekly emails, the source of the requirement is not always clear. Furthermore, the documentation included evidence of requiring rather than offering participation in the LEA's trainings, which can infringe upon charter autonomy to conduct trainings on their own.
 - iv. A site visit survey and kick-off meeting reflections demonstrate efforts to solicit feedback from schools. Additionally, the authorizer provides technical guidance related to a variety of compliance and reporting requirements through kick-off and quarterly meetings, weekly emails, and end of year meetings with schools. However, there is no documented evidence of connecting school feedback with the content of technical guidance, and school leaders were uncertain if/how their feedback was being implemented.
 - v. The authorizer's handbook provides a timeline for two (2) formal onsite visits per year and states, "The purpose of the visits is to ensure charter schools provide the necessary information and discuss current data to ensure charter schools are equipped with the necessary knowledge to meet the metrics outlined in the Charter Performance Framework and Contractual Agreement". The onsite visit template includes a series of questions ranging from academic performance to enrollment and school culture and school leaders stated that this information is requested in advance of a visit. Feedback forms for selected schools E and F document that the authorizer conducts formal visits as described in its handbook and provides schools with a report summarizing the visit. However, there is limited written guidance as to how site visits collectively inform the annual evaluation on the performance framework, including the authorizer's use of data collected through classroom observations and data presentations.
 - vi. While the authorizer's narrative describes a process of emailing schools before each visit to communicate the purpose and any requirements, no such emails or other evidence of communication with the selected schools in advance the authorizer's documented site visits was provided. Additionally, onsite visit templates and completed feedback forms from the formal visits contain questions or feedback that can be obtained and/or discussed without needing to be on-site (i.e., demographics, attendance and attrition data, formative assessment data), and though the classroom walkthrough protocol provides a method for collecting data during observations, the protocol is incorporated into feedback from 2022-23 site visits, but not 2023-24.
 - vii. Annual performance reports for the selected schools document the authorizer's evaluation of schools' outcomes on the performance framework. Email communication for both selected schools document communicating evaluation results to school leaders in the 2023-24 school year; however, the documentation did not include evidence of communicating with school leaders during the 2022-23 school year or communicating results with the governing body during the review term.

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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.				3	
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.			2		
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						3
Evaluative Comments:						
i.	Weekly email communication and an intervention process that allows schools to make their own determinations for next steps when a deficiency is identified provide evidence of the authorizer intentionally respecting school authority over its day-to-day operations. Additionally, school leaders provided examples of instances in which the authorizer did not weigh in on a charter's decision (i.e., staffing, disciplinary issues). However, the authorizer's handbook includes examples of supports offered by the extended core team that cross into its role as the LEA (i.e., course coding and grading, process class change forms, school improvement plan support), and there is no detail regarding these reports or any related oversight and monitoring that occurs. Given that the authorizer also serves as the LEA for its charter schools, some of the supports listed in the handbook align with responsibilities of the LEA (i.e., counseling, human resources, strategic investments), which should be differentiated and communicated separately to charter schools, such as through clearly defined tables or separate handbooks.					
ii.	While weekly emails and charter meeting presentations demonstrate detailed information is shared regarding reporting requirements, the requirements do not always align across documents or provide a comprehensive list of all reporting requirements for the year, thus creating an administrative burden on schools. Additionally, while there is some understood cadence (i.e., quarterly licensure submissions, monthly drill submissions), the school leader reflection feedback following a kick-off meeting illustrates additional deadlines are communicated unexpectedly and quickly outside the weekly emails. School leaders also expressed a perception of a growing administrative burden for arbitrary requirements.					
iii.	Email communication between authorizing staff and extended district staff and documents containing suggested revisions from the legal department demonstrate the authorizer's review of compliance requirements and adjustments based on changes in law and to further streamline processes. Additionally, email communication regarding safety drill requirements demonstrate the authorizer seeks to review compliance expectations and adjust as feasible to better align with law and for the potential to increase school autonomy.					

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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.			2		
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.			2		
Standard Rating						2.75
Evaluative Comments:						
i.	Lottery verifications submitted to the authorizer on behalf of selected schools E and F and indicators on the performance framework demonstrate that the authorizer ensures schools admit students through a random selection process that is open to all and publicly verifiable; however, the documentation did not include evidence of ensuring schools do not establish undue barriers to application, such as through a review of a schools' enrollment materials or enrollment policies.					
ii.	Weekly email communication regarding educator licensure and teacher-to-student ratio reporting deadlines, materials from trainings led by extended core authorizing staff, and indicators on the performance framework demonstrate that the authorizer ensures schools provide equitable access and inclusive services to students with disabilities and English learners. However, while materials for an annual kick-off meeting includes guidance related to services for homeless students, students in foster care, and migrant students, there is no further evidence of ensuring equitable access and services are provided to these student groups. Additionally, there is no evidence of ensuring services for at-risk students and gifted students. The authorizer noted that its strategic investments team supports with monitoring for these students, but no documentation was provided to affirm this.					
iii.	Section 2 of the charter agreements for selected schools E and F state general responsibilities of the authorizer (i.e., ensure requirements of special education laws are met) and the charter school (identify students, develop, and implement individualized education programs) and the authorizer's handbook includes examples of the types of supports it provides (i.e., support lead, classroom observations, audits, professional development).					

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Additionally, the authorizer conducts annual meetings to review requirements and supports provided by the extended team involved in serving students with disabilities.

- iv. While the performance framework includes an indicator that evaluates a school's discipline hearings, suspension and expulsion practices, the documentation does not include evidence of how, when, or what documentation is used to determine this. Additionally, though materials for an annual kickoff meeting includes discipline guidance and policy recommendations, the documentation does not include evidence of ensuring its schools' policies and actions are legal, fair, and equitable or that schools have a clear process for addressing grievances, such as through a school policy review. Furthermore, email communication from the authorizer to a charter school leader dated May 3, 2024 notes a change in the LEA's expulsion expectations stating that students cannot be expelled for any reason beyond zero-tolerance infractions effective April 29, 2024 and states "for non-zero tolerance infractions, schools should use disciplinary processes outlined in [the school's] parent and student handbook"; however, it is unclear what led to this change in policy and requiring this shift for charter schools, unless mandated by state law, infringes upon their autonomy.

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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.		1			
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.				3	
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						2.8
Evaluative Comments:						

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- i. While the authorizer’s handbook contains an intervention process that states general conditions that may trigger intervention (i.e., non-compliance, poor academic performance) and the types of actions that may follow (i.e., memo of non-compliance, notice of concern), the intervention process is not documented in board policy. State law requires that authorizers “adopt a progressive intervention policy⁷”; it is insufficient to document this policy in a handbook rather than in a board-approved policy.
- ii. An internal feedback form used by the extended authorizing team to identify and report issues of non-compliance and onsite visit documentation include evidence of the authorizer monitoring processes and documenting deficiencies. A notice of concern issued in response to teacher licensure, an email addressing enrollment violations, and English learner feedback forms demonstrate instances in which the authorizer’s monitoring identifies non-compliance. However, with various documentation names and methods of communication that exist outside of the authorizer’s intervention process, it is difficult to ascertain how these processes are consistently used to determine when intervention is needed. Additionally, annual performance reports provide evidence of the selected schools receiving “falls far below standard” across multiple academic outcomes for at least two (2) consecutive school years without documented evidence of any follow up, making it unclear when instances of academic underperformance would trigger intervention.
- iii. A notice of concern dated November 7, 2023, documents a teacher licensure concern and an email exchange between the authorizer and school leadership from October 2022 documenting the school’s enrollment count provide timely, clear and evidence-based notice of contract violations that are aligned the authorizer’s intervention process. However, the email communication includes conflicting next steps in response to the enrollment issue by citing language from the charter agreement which states that increases in enrollment requires a material change while simultaneously informing the school that the authorizer will not provide funding for any enrollment beyond the maximum amount allowable in the charter agreement. Furthermore, the documentation does not include evidence of communication with the governing board, as required by this substandard.
- iv. The notice of concern and email correspondence involving enrollment allow reasonable time and opportunity for remediation in these non-emergency situations.
- v. Email communication and a notice of non-compliance demonstrate that the authorizer engages in strategies that preserve school autonomy and responsibility; however, the notice does not contain possible consequences for continued noncompliance.

⁷ Tennessee Code Annotated § 49-13-122(c)

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Authorizer: Metro Nashville Public Schools

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:			2		
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.					
Standard Rating						2
Evaluative Comments: i. Two (2) annual reports contain performance data aligned with the performance framework. While the 2022-23 report contains an overall summary page and description of meeting the authorization evaluation goal, no summary page or goals were included in the provided 2022-21 report. A screenshot confirms the report is publicly posted on the authorizer's website; however, no documentation of sharing reports with the authorizer's decision-makers or charter school leaders was provided.						

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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.	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						4
Evaluative Comments:						
i.	The authorizer's handbook and board policy 1.900 establishes and communicates its amendment process that's aligned to the charter agreement and state law, requires the use of the state's amendment petition materials (as documented by a screenshot of the authorizer's website which links the state's materials), documents the required timeline for fall, spring, and emergency petitions, and acknowledges use of the state's required approval criteria.					
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.					
v.	N/A – The authorizer did not receive an amendment petition during the review term.					

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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.		1			
ii.	Provides to each school, in advance of the renewal decision using the timeline specified in state law, a cumulative performance report that: 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.		1			
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						2.25
Evaluative Comments:						
i.	While the authorizer's narrative described its interim review process, the authorizer confirmed that an interim review was not conducted for selected school G during the fifth (5 th) year of its charter term, as required in state law ⁸ .					
ii.	The cumulative report for selected school G, shared in accordance with the timeline established in state law (as evidenced by email communication), includes a snapshot of the school's academic performance for each year of its charter term and provided a comparison to district-level data, as well as a summary statement for the school's organizational and financial performance record noting that there were no major concerns in these areas during the charter term. While the report state summative findings, the report does not state the school's prospects for renewal, as required by this sub-standard.					
iii.	While the cumulative report for the selected school includes a closing statement inviting the school to "reach out to the MNPS Charter Schools Office if you have any questions or concerns"; this is insufficient as it does not provide the school with a meaningful opportunity and time to respond to the cumulative report. The renewal application, however, does allow the school to present additional evidence regarding its performance.					
iv.	Email communication between the authorizer and selected school G outlines the renewal process by providing an overview and details about information required within each section of the renewal application. The authorizer's handbook includes links to the state's required renewal application and outlines the timeline for each step of the renewal process, and a completed application demonstrates alignment with this process.					

⁸ T.C.A. 49-13-121(k)

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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.		1			
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.			2		
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.					4
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						3.16
Evaluative Comments:						

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- i. Appendix A of the authorizer’s handbook includes its renewal policy, which requires an analysis of a school’s comprehensive body of evidence through review of a renewal application, annual progress reports, and the renewal (cumulative) performance report, in accordance with state law. The board’s policy is consistent with the terms of the charter agreement for selected school G, which incorporates the policy in section 11.1 of the agreement. The authorizer’s handbook is posted on its website and shared with schools at the start of the school year.
- ii. While the charter agreement states the general process for renewal and the authorizer’s policy provides further details, including a timeline and corresponding actions, the documentation does not clearly define the criteria for renewal decisions. School leaders stated that the criterion for renewal is “fuzzy” and were unable to explain how renewal decisions are made. While having no impact on the score, it should be noted that the charter application process and renewal processes are different and, as it relates to charter renewal, state law only requires use of the state’s renewal application. While the Tennessee Department of Education also provides a scoring rubric, the scoring rubric is a model and is not required for use. The renewal process is intentionally broad to allow authorizers the autonomy to clearly define its own criteria for renewal that fairly assesses its authorized schools and considers the comprehensive body of evidence – review of a renewal application, annual progress reports, and the renewal (cumulative) performance report.
- iii. The renewal report, board meeting presentation materials, and a recording of the board’s vote to deny the renewal application for selected school G demonstrate that the authorizer considers whether its schools have achieved their academic targets and are organizationally and fiscally viable. However, the documentation does not demonstrate the review of a school’s comprehensive body of evidence, as required in the authorizer’s policy, and reflected in prior evaluative comments. Additionally, among the reasons for denial, the authorizer cited a memo of non-compliance that noted a lack of timely reimbursement requests from the selected school for use of its ESSER II funds; however, though the memo was issued in April 2022, the concern was not cited in the authorizer’s cumulative performance report issued in January 2023 or documented as a concern prior to the board’s renewal decision. Furthermore, the board meeting recording also made evident that funds and resources for its traditional schools, rather than for charter schools, was a priority consideration in its decision to non-renew, which does not align with the quality authorizing requirements of this sub-standard.
- iv. A decision letter dated one (1) day after the board’s vote to deny the renewal of selected school G included the authorizer’s reasons for denial, and the right to appeal its decision to the appellate body.
- v. As documented by links and screenshots, the authorizer live-streams its board meetings for public viewing and publishes decisions via meeting recordings and minutes to its website.
- vi. While there were deficiencies in the lack of clearly established renewal criteria and what to weigh as significant for renewal, there was no evidence of political or community pressure.

Charter School Authorizer Evaluation 2024

Authorizer: Metro Nashville Public Schools

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.		1			
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						1
Evaluative Comments:						
i.	While the authorizer's intervention process includes revocation as an option for addressing charter deficiencies, the documentation does not include a draft or board-approved version of a standalone revocation policy outlining the process, timeline, and reasons for revocation that is aligned to the performance framework, charter agreement, and state law. Additionally, the authorizer's board policy 1.901 grants authority to the director of schools to "allow charter agreements to be recommended for revocation if fiscal jeopardy to MNPS is likely [...]", which is not a permissible reason for revocation under state law ⁹ .					
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.					

⁹ Tennessee Code Annotated 49-13-122(b)

Charter School Authorizer Evaluation 2024

Authorizer: Metro Nashville Public Schools

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.					4
Standard Rating						4
Evaluative Comments:						
i.	The authorizer handbook, which is sent to schools annually and posted on the authorizer's website, states the purpose and general process for closure (i.e., work with the school's governing board, establish agreed upon completion dates, ensure a transparent and smooth closure) and provides a link to the Tennessee Department of Education's closure guidance, which contains all required actions of this standard. The authorizer did not oversee a school closure during the review term.					