



**Charter School Authorizer Evaluation Report**  
**Hamilton County Schools**  
**2023**

## Charter School Authorizer Evaluation 2023

Authorizer: Hamilton 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 (4<sup>th</sup>) 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"> <li>○ Hamilton County Schools</li> <li>○ Knox County Schools</li> <li>○ Memphis-Shelby County Schools</li> <li>○ Rutherford County Schools (beginning in 2025)</li> </ul>
Cohort 2	<ul style="list-style-type: none"> <li>○ Achievement School District</li> <li>○ Metro Nashville Public Schools</li> <li>○ Tennessee Public Charter School Commission</li> </ul>

### 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 term<sup>1</sup> 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

<sup>1</sup> The review term for this evaluation includes documentation from September 1, 2021 - August 31, 2023.

**Executive Summary**

General Information	
<b>Authorizer:</b>	Hamilton County Schools (HCS)
<b>About the Authorizer:</b>	HCS is a district authorizer in Hamilton County. HCS opened its first charter school in 2008 and its charter schools currently serve approximately 5.3% of the district's students.
<b># Operational Schools:</b>	8 schools in the 2022-23 school year
<b># Students Enrolled:</b>	2,539 students in the 2022-23 school year
<b># Approved School(s) in Development:</b> (name and planned opening year)	1 school in development <ul style="list-style-type: none"> <li>• Chatt Academy Community School (opening in 2024)</li> </ul>
<b>Closed Schools:</b> (name and year closed)	0 schools closed since September 1, 2021
Evaluation Summary	
<b>Identified Areas of Strength</b> <ul style="list-style-type: none"> <li>• The authorizer implements a rigorous application review process by engaging competent teams of internal and external evaluators to complete a thorough review of the written application and a substantive in-person interview, in addition to appropriate due diligence conducted by the decision-makers.</li> <li>• The authorizer developed and approved a performance framework that defines academic, financial, and organizational performance expectations for its charter schools.</li> <li>• The authorizer established an intervention policy that clearly states the general conditions that may trigger intervention and the types of actions and consequences that may ensue.</li> </ul>	
<b>Identified Areas for Growth</b> <ul style="list-style-type: none"> <li>• The authorizer's charter agreement negotiation and execution process must ensure appropriate term lengths in alignment with state law, clearly state the material and non-material terms, and ensure mutual understanding and acceptance of the agreement by charter school governing boards.</li> <li>• The authorizer must establish an oversight and monitoring system that is comprehensive, streamlined, and provides the necessary data to inform intervention decisions and annual charter school outcomes across all indicators on the performance framework.</li> <li>• The authorizer must define and communicate the criteria for renewal and non-renewal decisions that are consistent with the charter agreement, board policy, annual performance framework outcomes, and state law.</li> <li>• The authorizer must establish a board-approved revocation policy and a closure policy or procedure in accordance with state law and guidance.</li> </ul>	
<b>Required Follow Up Actions</b> <ul style="list-style-type: none"> <li>• Submission of a self-assessment in the 2024-25 school year, as required for all authorizers during a non-evaluation year.</li> </ul>	

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### Overall Ratings Summary:

Standard		Rating (0-4)	Average
1a	Planning and Commitment to Excellence	2.2	2.73
1b	Human Resources	2.66	
1c	Financial Resources	3.33	
2a	Proposal Information, Questions, and Guidance	3	3.1
2b	Fair, Transparent, Quality-Focused Process	3	
2c	Rigorous Approval Criteria	3	
2d	Rigorous Decision Making	3.4	
3a	Charter Agreement Negotiation and Execution	1.5	2.23
3b	Terms, Rights and Responsibilities	2.2	
3c	Performance Standards	3	
3d	Provisions for Educational Service Provider (ESP) (if applicable)	N/A	
4a	Performance Evaluation and Compliance Monitoring	1.28	2.24
4b	Respecting School Autonomy	2.33	
4c	Protecting Student Rights	2	
4d	School Intervention	3.6	
4e	Public Reporting	2	
5a	Amendments to the Charter Agreement	2.5	1.75
5b	Renewal Process	N/A	
5c	Renewal Decisions Based on Merit and Inclusive Evidence	2.5	
5d	Revocation	1	
5e	Closure	1	
<b>Overall Rating</b>		<b>2.39</b> <b>Satisfactory</b>	

<b>Standard 1a - Planning and Commitment to Excellence</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.		1			
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.		1			
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
<b>Standard Rating</b>						<b>2.2</b>

<b>Evaluative Comments:</b>	
i.	Certificates of completion, meeting presentation decks, and a screenshot of online training modules demonstrate that two (2) of the nine (9) authorizing staff members identified in the authorizer fee report completed professional development related to the quality charter authorizing principles and standards during the review term. A “Charter 101” presentation deck from October 2022 demonstrates that decision-makers and leadership received training on the principles and standards once during the review term; however, documentation of training for additional staff funded by the authorizer fee was not provided.
ii.	Board minutes include a disclaimer statement that is recited at the start of each board meeting, as needed, which reads, “I declare that I have a [spouse, parent, grandparent, child, sibling, aunt, uncle, nephew, niece, relation-in-law or member of my household] who works for the school system and that the Board’s vote on [budget, policies, etc.] may have an effect on my relative’s employment. Even so, I hereby certify that I will cast my vote in the best interest of the school system”; however, this statement is insufficient as it is strictly limited to board members and any relatives they have who are employed by the district and does not address external relationships, funding structures, and lines of authority to protect its authorizing functions from conflicts of interest and political influence and no documentation of a board policy was provided. The authorizer should ensure through a board policy and/or disclosure form that decision-makers disclose any personal or perceived conflicts with charter school employees, governing board members, sponsors, or charter school applicants. Additionally, the documentation does not address how leadership or staff with authorizing responsibilities disclose or address potential conflicts of interest.

- iii. The handbook states a mission for the district and recognizes high quality charter authorizing as a strategy to fulfill its mission, and annual authorizer reports include a specific mission for the charter office; however, evidence of developing goals and annually establishing plans for improvement beyond the development and completion of a required corrective action plan following the 2021 evaluation was not provided.
- iv. While the authorizer has some policies in place (i.e., intervention, renewal, charter application review) and has begun implementing site visit practices during the 2022-23 school year, the documentation does not make evident how the authorizer streamlines its work toward stated goals to ensure efficiency as no stated goals were provided. Furthermore, the documentation did not include evidence of systematizing its processes to ensure efficiency, such as through clear monitoring processes that build upon one another and are used to inform annual evaluations.
- v. As documented in the submitted application materials, evaluation evidence, and board recordings for one (1) charter school application and two (2) amendment petitions, the authorizer makes decisions that are likely to result in positive student based on evidence, data, and expertise.

<b>Standard 1b - Human Resources</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>					
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.				3	
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.				3	
<b>Standard Rating</b>					<b>2.66</b>

**Evaluative Comments:**

- i. The authorizer’s documentation included resumes and job descriptions for staff members who provide support to the charter schools, which showed staff members possess expertise in all areas essential to charter school oversight except nonprofit governance and management. The authorizer affirmed this exception during the document debrief as well.
- ii. Certificates of completion and professional development session materials serve as evidence of ongoing professional development for two (2) of the nine (9) authorizing staff members cited in the fee report; however, the documentation did not include evidence of developing and retaining additional staff or leadership funded by the authorizer fee, such as through completion of professional development relevant to their roles.
- iii. A board retreat presentation led by authorizing staff in 2022 and an email to board members with information regarding the receipt of a charter school application demonstrate that authorizing staff has the opportunity to provide some input with leadership and decision-makers. Additionally, school leaders cited instances when authorizing staff was called upon by decision-makers to provide additional information during board meetings and expressed gratitude for the visibility of the authorizing staff. However, documentation did not include evidence of opportunities to provide input more than once within the review term, and the authorizer acknowledged that 2022 was the first opportunity for authorizing staff to participate in a board retreat.



<b>Standard 1c – Financial Resources</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.				3	
iii.	Annually reports the authorizing obligations fulfilled using the authorizer fee in accordance with state law.				3	
<b>Standard Rating</b>						<b>3.33</b>
<b>Evaluative Comments:</b>						
i.	Authorizing budgets demonstrate that the authorizer determines the financial needs of the office (i.e., budgeting for support personnel, professional development, consulting services) and the 2021 and 2022 fee reports document how the collected authorizer fee funds are used to cover allowable expenses relevant to authorizing responsibilities. Both fee reports include expenditures that exceed revenues and the authorizer explained in the document debrief that any excess is absorbed by the district. While having no impact on the score, a line item representing the additional funding source should also be included in the fee report or budget.					
ii.	Authorizing budgets document a plan to effectively deploy funds to cover authorizing costs, fee reports affirm expenditures, and the authorizer’s narrative describes an efficient process for determining costs and spending. However, the documentation does not make evident how the authorizer transparently communicates spending, such as by posting fee reports on its website and directly emailing finalized reports to schools.					
iii.	The 2021 and 2022 fee reports demonstrate that the authorizer develops an annual report; however, the documentation did not include evidence of submitting both annual fee reports to the Department of Education during the review term.					

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Standard 2a - Proposal Information, Questions, and Guidance Sub-standards	0	1	2	3	4
i. Develops and issues a charter application information packet or request for proposals (RFP) that: <ul style="list-style-type: none"> <li>a) States the authorizer’s mission and any chartering priorities the authorizer may have established;</li> <li>b) Provides the state’s required comprehensive application and rubric to elicit the information needed for rigorous evaluation of applicants’ plans and capacities; and</li> <li>c) Communicates clear guidance, requirements and timelines with prospective operators regarding the application content and format, while explaining evaluation criteria.</li> </ul>				3	
<b>Standard Rating</b>					<b>3</b>
<b>Evaluative Comments:</b>					
i. The authorizer’s applicant guidance document is posted on its website and includes chartering priorities, details about the state’s required application and scoring rubric, submission requirements, and timelines for the 2022 cycle; however, the timeline does not include dates beyond the board’s vote on the initial application should an amended application review or appeal be needed. While having no impact on the score, due to the timing of changes to the evaluation standards, the authorizer should align materials with the updated submission requirements outlined in State Board rule and include the authorizer’s mission in future guidance.					

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<b>Standard 2b - Fair, Transparent, Quality-focused Process</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.				3	
iii.	Engages, for both written application reviews and applicant interviews, highly competent teams of internal and external evaluators with relevant academic, organizational (governance and management), financial, and legal expertise, as well as thorough understanding of the essential principles of charter school autonomy and accountability.					4
iv.	Provides orientation or training to application evaluators (including interviewers) to ensure consistent evaluation of standards, practices, and the fair and unbiased treatment of all applicants.			2		
<b>Standard Rating</b>						<b>3</b>

**Evaluative Comments:**

i.	Application guidance and links on the authorizer website, communications with the applicant for selected school A, and a board meeting agenda affirm an open, well-publicized, and transparent process aligned to timelines was implemented. The board policy, however, only includes information on application submission and neither references additional procedure documents, nor provides further information about the application process, such as additional timelines, details about review committees, or scoring criteria. Additionally, the board policy includes a deadline of December 1 for the letter of intent, which is incorrect and should be updated to December 3 (60 days prior to the application submission deadline on February 1) in accordance with law and State Board rule. While having no impact on the score, as a best practice, the State Board recommends updating the board policy to clearly define when authorizing staff will provide application materials to the decision-makers for their review in advance of a vote.
ii.	As documented by the application materials, capacity interview notes, and board meeting recordings, the authorizer allows sufficient time for each stage of the application process, as required in law. However, the authorizer’s guidance document states, “Applications must not exceed 350 pages including appendices, excluding the budget document and the diversity plan”, which does not align with the state’s application process as the maximum number of pages is incorrect and there are no requirements to complete a diversity plan either in the application itself or as supplemental materials submitted to the Department of Education in advance of the application review cycle.
iii.	The review team recommendation report for selected school A documents the names of nine (9) individuals, with one external reviewer and an education consultant serving on the review team, with relevant academic, organizational, and financial expertise. Additionally, the authorizer discussed in the document debrief how staff leverages district legal support throughout the application process.

- iv. A training presentation deck for the review team demonstrates that the authorizer provides training to reviewers and a conflict of interest form demonstrates that the authorizer requires reviewers to disclose any potential personal conflicts with the applicant; 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. Additionally, the training materials do not include evidence of ensuring consistent practice among reviewers, such as through application scoring practice and/or rubric norming.

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"> <li>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;</li> <li>b) Establishes distinct requirements and criteria for applicants who are existing school operators or replicators including:               <ul style="list-style-type: none"> <li>1. Clear evidence of their capacity to operate new schools successfully while maintaining quality in existing schools;</li> <li>2. Documentation of their educational, organizational, and financial performance records based on all existing schools;</li> <li>3. Explanation for any never-opened, closed, revoked, or non-renewed schools (including closed, revoked or non-renewed third-party contracts to operate schools);</li> <li>4. Presentation of their growth plan, business plan, and most recent financial audits;</li> <li>5. Evidence of meeting high standards of academic, organizational, and financial success to earn approval for replication; and</li> <li>6. Document any current or past litigation and the resolution of such litigation.</li> </ul> </li> <li>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"> <li>1. Evidence of the service provider’s educational and management success;</li> <li>2. A description of the process for selecting the ESP;</li> <li>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</li> </ul> </li> </ul>			2		

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<p>explanation of compensation to be paid to the provider; financial controls and oversight; investment disclosure; methods of contract oversight and enforcement; and conditions for contract renewal and termination; and</p> <p>4. Disclosure and explanation of any existing or potential conflicts of interest between the school governing board and proposed service provider or any affiliated business entities.</p> <p>d) Considers diverse educational philosophies and approaches.</p> <p>e) Requires applicants to demonstrate capacity to serve students with diverse needs, including students with disabilities or learning exceptionalities, English learners, at-risk students, and gifted students.</p>					
<p>ii. Requires all applicants to participate in a capacity interview to elicit evidence-based explanations which allow the applicant to demonstrate clear evidence of capacity to execute its plan successfully.</p>					4
<b>Standard Rating</b>					<b>3</b>
<b>Evaluative Comments:</b>					
<p>i. While documentation for selected school A included a completed charter school application using the state’s form, evidence of using the state’s scoring rubric, such as via a consensus rubric or completed individual reviewer rubrics was not provided.</p> <p>ii. Email communication with selected school A regarding the capacity interview and a list of capacity interview questions demonstrates that the authorizer requires applicants to participate in a capacity interview and covers topics such as implementing the academic plan, recruitment of certified educators, and serving special populations.</p>					

<b>Standard 2d - Rigorous Decision Making</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>					
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.			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.				3	
v. Does not make application decisions on the basis of political or community pressure.					4
<b>Standard Rating</b>					<b>3.4</b>

<b>Evaluative Comments:</b>					
i.	Recordings of board meetings document the board’s consideration of the review committee’s recommendation report summarizing the applicant’s competence and capacity, a discussion of evidence-based reasons to approve the application, and their vote to approve the application for selected school A.				
ii.	The recommendation report and board meeting recordings demonstrate the authorizer utilized the application, capacity interview, and other due diligence to inform the committee’s recommendation and decision outcome.				
iii.	While the documentation included a conflict-of-interest form for reviewers to complete, only six (6) of the nine (9) reviewer forms were submitted. Additionally, the documentation did not include evidence of ensuring its decisions are free from conflicts of interest through documentation, such as through a board policy or completed COI disclosure forms for each of the decision-makers.				
iv.	Email communication dated one (1) day after the board voted to approve the application for selected school A demonstrates that the authorizer promptly notifies applicants of its decision; however, the notification did not include the evidence-based factors that determined the decision.				
v.	The board’s approval of the application for selected school A in agreement with a recommendation to approve from the review committee demonstrate that the board does not make application decisions on the basis of political or community pressure.				

<b>Standard 3a - Charter Agreement Negotiation, and Execution</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
i.	Executes a charter agreement between the authorizer and a legally incorporated governing board independent of the authorizer.			2		
ii.	Ensures mutual understanding and acceptance of the terms of the charter agreement by the school's governing board.		1			
<b>Standard Rating</b>						<b>1.5</b>
<b>Evaluative Comments:</b>						
i.	While the charter agreement for selected school C includes signatures from the authorizer's board chair and director of schools, the agreement was signed by the executive director rather than the governing board chair and no documentation of delegated authority was provided. The charter agreement for selected school D includes signatures from the authorizer and the governing board; however, the agreement was executed more than six (6) months after board approval.					
ii.	While the authorizer provided evidence of communication with a school leader regarding the terms of its charter agreement, the school leader was not from one (1) of the two (2) selected schools for this standard.					



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<b>Standard 3b – Terms, Rights and Responsibilities</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.		1			
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.			2		
iv.	Executes charter agreements that clearly: <ul style="list-style-type: none"> <li>a. State the rights and responsibilities of the school and the authorizer;</li> <li>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;</li> <li>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;</li> <li>d. State the statutory, regulatory, and procedural terms and conditions for the school’s operation;</li> <li>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;</li> <li>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</li> <li>g. State the responsibilities of the school and the authorizer in the event of school closures.</li> </ul>			2		
v.	Ensures that purchasing any fee-based services that the authorizer provides is explicitly not a condition of charter approval, continuation, or renewal.			2		
vi.	For any fee-based services that the authorizer provides, the authorizer develops a separate services agreement that respects charter school autonomy and treats the charter school equitably compared to district schools, if applicable.	N/A				

Standard Rating

**2.2**
**Evaluative Comments:**

- i. Section 5.1 of the charter agreements for selected schools C and D requires the authorizer to conduct a high stakes interim review every five (5) years; however, neither of the agreements require the authorizer to produce annual performance reports, as required by state law. Additionally, the dates included in section 5.1 of the agreement for selected school C establishes an 11-year charter term rather than 10, which is not allowable in state law. Furthermore, while selected school C's agreement was signed in May 2021, the first sentence of the agreement states that it was entered into in June 2022 after renewal of the charter.
- ii. Material terms are defined throughout the agreement for selected schools C and D (i.e., section 1.3 Governing Body, section 3.6 Reporting, section 3.7 Curriculum, Instruction and Benchmarks), with additional terms outlined in the approved application, which is incorporated by reference and as "Appendix 1". While having no impact on the score, the appendix document was not included as part of the agreement and recent amendments cite the authorizer's performance framework as "Appendix 1", which conflicts with its original agreement. The authorizer should combine all documents into one (1) file and correct the duplicated appendices.
- iii. While section 7.9 of the charter agreements for selected schools C and D states, "This agreement may be modified only by written amendment executed by all parties and their signatories hereto", the language is insufficient and should explicitly state expectations regarding the formal amendment process outlined in the Tennessee Public Charter School Commission's rule. Furthermore, section 3.1 states, "If the Governing Body seeks to amend this Charter Agreement or the Application, it shall petition the Chartering Authority as set forth in T.C.A. §49-13-110(b)", which is prohibitive and does not allow for non-material changes.
- iv. While the charter agreements for selected schools C and D address some of the criteria of this sub-standard, the agreements do not define the criteria and conditions for renewal, non-renewal, and intervention; the pre-opening requirements; or the responsibilities of the school and authorizer in the event of a closure. In addition, the agreements include sections that limit a charter school's autonomy; for example, section 3.12.3 states that charter school purchases over \$50,000 need to be "noticed" to authorizer and section 3.17 requires the charter school to seek authorizer approval for its transportation contracts.
- v. While some sections of charter agreements for selected schools C and D state that the charter school can enter into a service agreement with the authorizer (i.e., special education services, food services), the agreement does not include explicit language stating that fee-based service agreement with the authorizer shall not be a condition of approval, continuation, or renewal.
- vi. N/A – Selected schools C and D do not currently have any fee-based service agreements with the authorizer.

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"> <li>a. Objective and verifiable measures of student achievement as the primary measure of school quality, in accordance with state law;</li> <li>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;</li> <li>c. Expectations for appropriate access, education, support services, and outcomes for students with disabilities;</li> </ul>				3	
ii. The performance framework includes clearly defined and measurable indicators, measures, metrics, and targets that: <ul style="list-style-type: none"> <li>a) Academic Performance               <ul style="list-style-type: none"> <li>1. Define the sources of academic data that will form the evidence base for ongoing and renewal evaluation;</li> <li>2. Set expectations for student academic achievement status or proficiency, including comparative proficiency;</li> <li>3. Set expectations for student academic growth, including adequacy of growth toward state standards;</li> <li>4. Incorporate state and federal accountability systems, including state grading and/or rating systems;</li> <li>5. Set expectations for postsecondary readiness, including graduation rates (for high schools); and</li> <li>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.</li> </ul> </li> <li>b) Financial Performance               <ul style="list-style-type: none"> <li>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;</li> </ul> </li> </ul>				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>					
<b>Standard Rating</b>					<b>3</b>
<p><b>Evaluative Comments:</b></p> <p>i. Board documents demonstrate that the authorizer approved a performance framework as an amendment to its charter agreements at the November 17, 2022 meeting, and the performance framework is attached as an exhibit of the charter agreements for selected schools C and D. The attached performance framework sets student achievement as the primary measure of school quality and includes academic, financial, and organizational targets as well as expectations and outcomes for students with disabilities; however, neither the performance framework nor the charter agreements clearly connect performance outcomes to the conditions for renewal.</p> <p>ii. The performance framework meets most of the stated academic, financial, and organizational performance 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)	0	1	2	3	4
<p><b>Sub-standards</b></p> <p>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:<sup>2</sup></p> <ul style="list-style-type: none"> <li>a. Clearly establish the primacy of the charter agreement over the ESP contract;</li> <li>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;</li> <li>c. Prohibit the ESP from selecting, approving, employing, compensating, or serving as school governing board members;</li> <li>d. Provide for sufficient transparency around the spending of public monies; and</li> <li>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.</li> </ul>	N/A				
<p>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:</p> <ul style="list-style-type: none"> <li>a. The roles and responsibilities of the school governing board and the ESP, including all services to be provided under the contract;</li> <li>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;</li> <li>c. All compensation to be paid by the ESP, including all fees, bonuses, and what such compensation includes or requires;</li> <li>d. Terms of any facility agreement that may be part of the relationship;</li> <li>e. Financial reporting requirements and provisions for the school governing board’s financial oversight;</li> <li>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;</li> </ul>	N/A				

<sup>2</sup> 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"> <li>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;</li> <li>h. Provisions for contract termination; and</li> <li>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.</li> </ul>		
<b>Standard Rating</b>		<b>N/A</b>
<b>Evaluative Comments:</b>		
<p>This standard is N/A. Selected schools C and D do not contract with an educational service provider.</p>		

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<b>Standard 4a – Performance Evaluation and Compliance Monitoring</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.		1			
ii.	Defines and communicates to schools the process, methods, and timing of gathering and reporting school performance and compliance data.			2		
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.		1			
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.		1			
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.		1			
<b>Standard Rating</b>						<b>1.28</b>
<b>Evaluative Comments:</b>						

- i. While adopting the state performance framework, conducting bi-annual site visits, and producing authorizer reports are improvements from its 2021 evaluation, the authorizer has not yet established and implemented the necessary procedural steps to access documentation and data necessary to evaluate indicators on its framework and inform renewal, revocation, or intervention decisions. There is also limited information in the agreement regarding monitoring and neither a draft nor approved board policy on oversight and monitoring was provided.
- ii. Outside of email communication regarding site visits that occurred during the 2022-23 school year and charter newsletters with deadlines to submit an annual report and fiscal audit, the documentation does not include further evidence of defining and communicating performance and compliance data reporting requirements to schools in alignment with all areas of the performance framework.
- iii. While charter newsletters, site visit materials, and screenshots documenting access to data platforms (i.e., academic dashboard, TNPulse, school website searches) demonstrate that the authorizer minimizes administrative burdens, the documentation did not include evidence of streamlining the requests, such as developing a reporting calendar or documenting all annual reporting deadlines in the handbook. Additionally, it is unclear how evidence gathered through email requests or during site visits is used to inform outcomes on the performance framework.
- iv. School leaders and authorizing staff described an ongoing informal solicitation of feedback to inform updates to authorizing work. However, there is no documented evidence of soliciting feedback to inform technical guidance, and the authorizer affirmed that this is a goal for their office.
- v. Documentation from site visits during the 2022-23 school year, such as schedules, interview questions, and a classroom observation notes template, make evident that the authorizer conducts formal on-site visits to its schools; however, the documentation does not include evidence of site visits from the 2021-22 school year or demonstrate how the data collected is used to inform the school's annual evaluation. Furthermore, while documents labeled as feedback for the site visits were provided, the documents included a list of notes from site visit interviews with no actionable feedback from the authorizer provided.
- vi. While a newsletter dated February 7, 2023 communicates the purpose of the spring site visit, there is no evidence of this type of communication occurring ahead of the fall site visit during the 2022-23 school year or any communication regarding site visits during the 2021-22 school year. Additionally, the documentation does not include evidence of ensuring visits are used for collecting data that cannot be obtained otherwise, and there is no mention of site visits in the charter agreement. Furthermore, while the authorizer's site visit protocol defines the frequency of the site visits (twice per year), neither the purpose nor methods the authorizer uses are defined.
- vii. While the authorizer's annual reports demonstrate that each school is evaluated, the documentation does not make evident how or when individual evaluation results are communicated to school governing boards and leadership, such as through an annual end-of-year meeting or a review of the performance framework outcomes with each school. Additionally, the 2021 report does not align with a performance framework, as a framework was first established in 2022. Furthermore, the 2022 annual report does not include finalized financial performance outcomes.



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<b>Standard 4b - Respecting School Autonomy</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.			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.		1			
<b>Standard Rating</b>						<b>2.33</b>
<b>Evaluative Comments:</b>						
i.	Email invitations for school leaders to attend optional district-wide trainings and the charter agreements for selected schools E and F make evident that the authorizer respects the school's authority over its day-to-day operations. School leaders affirmed that the authorizer respects the operational authority of its charter schools.					
ii.	The authorizer collects information via email (i.e., fiscal audits, annual reports) and during site visits (i.e., interviews with parents, board members, school leaders) and requests are communicated to school leaders in advance of any submission deadlines or scheduled visits. However, the documentation does not make evident a regular cadence for information collection, which can create administrative burdens, and it is unclear how the information collected provides sufficient detail to inform indicators on its performance framework.					
iii.	While the authorizer stated that it reviews compliance requirements and evaluates the potential to increase school autonomy, no documentation affirming this process, such as a year-end review staff agenda or otherwise, was provided.					

<b>Standard 4c - Protecting Student Rights</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.			2		
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.		1			
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	
<b>Standard Rating</b>						<b>2</b>

<b>Evaluative Comments:</b>	
i.	While documentation for one (1) of the two (2) selected schools demonstrates participation in the district's lottery process and an indicator within the performance framework requires the evaluation of a school's enrollment policies and practices, the documentation does not include evidence of additional compliance reviews beyond the option to participate in the district's lottery, such as reviewing the charter school's enrollment application and enrollment policies to ensure alignment with law. Additionally, though the narrative states that the authorizer reviews the websites and admissions policies of its charter schools, documented evidence of this practice was not provided.
ii.	Site visit documentation demonstrates that the authorizer observes English language learner classes during scheduled visits, email communication documents that the authorizer provides special education supports to charter schools when questions arise, a screenshot of TNpulse documents the authorizer's access to individual education program data for special education students, and the authorizer's performance framework includes indicators that assess the extent to which a school is protecting the rights of students with disabilities and English language learner students. However, the documentation does not make evident how and when the authorizer is ensuring services to all students, such as through a monitoring schedule or document audits during a site visit, or ensuring appropriate services for homeless students, students in foster care, migrant students, at-risk students, and gifted students.
iii.	Section 3.7.1 of the charter agreements for selected schools E and F states some responsibilities of the charter school regarding students with disabilities and allows charter schools to contract with the authorizer for services; however, the agreements do not include any responsibilities of the

authorizer and no further documentation was provided clearly stating the roles and responsibilities all parties involved in serving students with disabilities.

- iv. Section 3.11 of the charter agreements for selected schools E and F state, “No student shall be expelled or transferred involuntarily from the charter school [...]”, and an indicator on the performance framework requires the authorizer to assess school discipline policies and practices; however, the documentation does not include evidence of the authorizer ensuring its schools have a process for addressing parent/community grievances or evidence of reviewing student handbooks submitted by the school, such as through an annual policy review.

<b>Standard 4d - School Intervention</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
i.	Establishes and clearly communicates to schools at the outset an intervention and problem-solving policy that states the general conditions that may trigger intervention and the types of actions and consequences that may ensue.					4
ii.	Utilizes ongoing oversight and evaluation processes to determine when intervention in non-emergency situations is needed.			2		
iii.	Provides clear, evidence-based, and timely notice of contract violations or performance deficiencies that are aligned to the intervention policy and is communicated to the school leaders and governing board.					4
iv.	Allows schools reasonable time and opportunity for remediation in non-emergency situations.					4
v.	Engages in intervention strategies that clearly preserve school autonomy and responsibility (identifying what the school must remedy without prescribing solutions) while clearly stating possible consequences for noncompliance.					4
<b>Standard Rating</b>						<b>3.6</b>

**Evaluative Comments:**

i.	A board policy on intervention and the charter handbook establishes and communicates an intervention and problem-solving policy to schools. The policy states general conditions that may trigger intervention, such as weak performance, failure to comply with state laws or district policies, and failure to meet objectives in a performance improvement plan and includes the types of actions and consequences that may ensue, including charter review and revocation.
ii.	A notice of concern regarding a federal designation demonstrates that the authorizer follows its intervention process and the authorizer noted that this was the only instance of intervention during the review period. However, there were multiple other instances of outcomes in the 2022 annual report of sub-performance (e.g., a school fell far below standard for suspension and teacher retention rates; a school fell far below standard for all achievement areas and chronic absenteeism) and the authorizer was unable to articulate a clear process for determining when ongoing monitoring and oversight conducted by the authorizer or performance framework outcomes would trigger intervention.
iii.	A notice of concern regarding a federal designation clearly stated the academic concern, was issued in a timely manner following the release of the federal designation, and was aligned with the authorizer’s intervention policy. The notice was addressed to the governing board and email communication documents that the notice was sent to school leaders.
iv.	A notice of concern regarding a federal designation set a reasonable timeline of one year for improvement with quarterly check-ins required to discuss progress. While having no impact on the score, intervention notices should also clearly state what information will be reviewed during any check points requested by the authorizer.

- v. A notice of concern regarding a federal designation offered appropriate supports to the charter school while refraining from prescribing solutions and stated that it will determine if a further designation is necessary upon release of new state scores in the following year.

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"> <li>a. Provides clear, accurate performance data for the charter schools it oversees;</li> <li>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</li> <li>c. Reports on the authorizer’s performance in meeting its goals.</li> </ul>			2		
<b>Standard Rating</b>					<b>2</b>
<b>Evaluative Comments:</b>					
i. The 2021 and 2022 annual reports and a screenshot of the authorizer’s website demonstrate that the authorizer produces and publicly shares a report that provides clear and accurate performance data for its schools and reports on individual school and overall portfolio performance; however, because the authorizer first established a performance framework in 2022, the 2021 annual report outcomes were not aligned to a framework set forth in the charter agreement. Additionally, the annual reports did not include a reflection on the authorizer’s performance in meeting its goals.					

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<b>Standard 5a – Amendments to the Charter Agreement</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.		1			
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.				3	
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.			2		
iv.	Does not make revocation decisions on the basis of political or community pressure.					4
<b>Standard Rating</b>						<b>2.5</b>

**Evaluative Comments:**

- i. Email communication between the authorizer and selected school G document a discussion of some steps (i.e., a link to the required application and a general timeline to approve or deny) in the authorizer’s amendment process, but the documentation does not include evidence that these process steps have been communicated with all schools. Additionally, while the charter handbook states that amendments are allowable and provides a link to the Department of Education’s website, the link is inactive and specific details regarding the authorizer’s amendment process, such as the requirement to use the state’s rubric, details about the process timeline, or approval criteria, are not included.
- ii. Notification emails to selected school G in 2021 and 2023 demonstrate that the authorizer promptly notifies a school of its decision within five (5) days. While the notification emails state that the reasons for the decision are included in an attached letter, only the 2021 attachment was provided.
- iii. Though the completed rubric for selected school G’s 2021 amendment petition documents that the petition did not meet all standards of the rubric (i.e., lacking community support and a sufficient description of facilities space), authorizing staff recommended approval and the amendment was approved by the decision-makers. Additionally, while selected school G’s 2023 amendment petition differed from the 2021 petition, the completed rubric contained the same notes from authorizing staff, was recommended for approval and was approved by the decision-makers. However, an explanation of why the completed rubrics were nearly identical was not provided. Therefore, though the authorizer granted amendments to the selected school in 2021 and 2023, the documentation does not clearly demonstrate that the petitions met the criteria of this sub-standard.
- iv. Board meeting minutes document the decision-maker’s votes to approve the 2021 and 2023 amendment petitions for selected school G in accordance with staff recommendation demonstrate that the authorizer does not make amendment decisions based solely on political or community pressure.

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<b>Standard 5b - Renewal Process</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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"> <li>a. Summarizes the school’s performance record over the charter term; and</li> <li>b. States the authorizer’s summative findings concerning the school’s performance and its prospects for renewal.</li> </ul>			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		
<b>Standard Rating</b>						<b>N/A</b>
<b>Evaluative Comments:</b>						
This standard is N/A. The authorizer did not have a school in the renewal process during the review term.						



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<b>Standard 5c - Renewal Decisions Based on Merit and Inclusive Evidence</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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				
<b>Standard Rating</b>						<b>2.5</b>
<b>Evaluative Comments:</b>						
i.	Board policy provides an overview of the renewal process, and the charter handbook outlines a renewal process that requires a thorough analysis of a school’s comprehensive body of objective evidence, including the renewal application, cumulative report, renewal site visit, and satisfaction surveys. However, there is no information related to renewal in the charter agreement nor is there language connecting the performance framework standards and renewal in the agreement.					
ii.	While the handbook states, “Renewal recommendations are made based upon a body of evidence around the school’s academic and organizational performance” and includes a list of evidence collected, the documentation does not include specific criteria for renewal and non-renewal decisions. Additionally, the handbook’s statement is inconsistent with the charter agreement as the agreement is limited to a requirement that schools submit a renewal application consistent with state law and the authorizer renew for 10 years if “the application is approved”. In the absence of specific criteria, the handbook language appears to prevail and require “meeting” performance expectations as the basis for renewal though this is not clearly defined, and school leaders were unable to articulate how the authorizer makes renewal decisions.					
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.

<b>Standard 5d - Revocation</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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				
<b>Standard Rating</b>						<b>1</b>
<b>Evaluative Comments:</b>						
i.	While the intervention policy approved by the board in 2023 includes revocation as an option for addressing charter deficiencies, the documentation does not include a draft or 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.					
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.					

<b>Standard 5e - Closure</b>		<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
<b>Sub-standards</b>						
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.		1			
<b>Standard Rating</b>						<b>1</b>
<b>Evaluative Comments:</b>						
i.	While the handbook states three (3) primary goals to accomplish in the event of a closure, neither the handbook nor any other documentation clearly establish a closure process that outlines the responsibilities of the charter school and authorizer, such as timely notification to parents, orderly transition of student records, and disposition of funds, to ensure alignment with this sub-standard, state guidance, and state law. The authorizer did not oversee a school closure during the review term.					