



Charter School Authorizer Evaluation Report
Achievement School District
2022

Charter School Authorizer Evaluation 2022

Authorizer: Achievement School District

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 is 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 gathered feedback from operators, authorizers, and charter school stakeholders on its Quality Charter Authorizing Standards, conducted focus groups to review feedback, connected with the three (3) other states that had an established authorizer evaluation system, and established a task force that included authorizers and operators to share in the development of the evaluation process. In addition, the State Board implemented a pilot evaluation with two (2) authorizers participating voluntarily in Fall 2020. The pilot served as a valuable step to prepare the State Board and Tennessee authorizers for its high-stakes authorizer evaluations.

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 exempted 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 Unsatisfactory/Incomplete rating. An exemption or required additional evaluation does not change an authorizer’s assigned evaluation cohort.

Table 1. Cohort Evaluation Schedule

Cohort	Authorizers
Cohort 1	<ul style="list-style-type: none"> ○ Hamilton County Schools ○ Knox County Schools ○ Shelby County Schools
Cohort 2	<ul style="list-style-type: none"> ○ Achievement School District ○ Metro Nashville Public Schools ○ Tennessee Public Charter School Commission

Evaluation Process

The evaluation is based on the twenty-four standards within State Board [Policy 6.111 – Quality Charter Authorizing Standards](#). The standards are organized into six (6) categories: Agency Commitment and Capacity; Application Process and Decision Making; Performance Contracting; Ongoing Oversight and Evaluation; Revocation and Renewal Decision Making; and Advanced Standards. The authorizer’s overall rating is based on the evaluation team’s consideration of standards, with the Advanced Standards category providing the opportunity for bonus points.

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Characteristics of the Process

- Each authorizer is evaluated by an evaluation team with experience in charter school authorizing. 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.
- Evaluations focus on a two (2) year review term¹ and are limited to the review of the following: 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 which performance level best represents the authorizer’s practice. Each sub-standard is assigned a rating of zero (0) through four (4), as represented in Table 2, and each standard receives a rating representing the average of its sub-standards.
- The final product of each evaluation is a completed Authorizer 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 of the rubric and relevant feedback for the authorizer. Comments also note cases in which the authorizer did not provide relevant documents.
- While the State Board developed its evaluation process to ensure it is fair and consistent across authorizers, evaluation of the twenty-four (24) 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 0520-14-01-.08, the final Authorizer Evaluation Report will be presented to the State Board for approval at the meeting following release of the final Authorizer 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 LESS THAN 50% of the Standard	Documentation Addresses <u>and</u> Satisfies MOST of the Standard	Documentation Addresses <u>and</u> Satisfies ALL 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, 2020 through August 31, 2022.

Executive Summary

General Information	
Authorizer:	Achievement School District (“ASD”)
About the Authorizer:	The ASD is a state-level authorizer within the Tennessee Department of Education that was established by law in 2011 to serve as an intervention for some of the state’s lowest performing schools. While the ASD is considered an authorizer in Tennessee pursuant to T.C.A. § 49-13-104, the ASD operates under additional legal provisions that do not apply to other authorizers.
# Operational Schools: # Students Enrolled:	26 schools in the 2021-22 school year 8,462 students in the 2021-22 school year
# Approved School(s) in Development: (name and planned opening year)	0 schools in development
Closed Schools: (name and year closed)	0 schools closed since September 1, 2020
Evaluation Summary	
<p>Identified Areas of Strength</p> <ul style="list-style-type: none"> • The authorizer executes charter agreements with a legally incorporated governing board that defines the material terms of the agreement and allows occasional material changes to a school’s plans through amendments to the charter agreement. • The authorizer respects its schools’ authority over the day-to-day operations and refrains from directing or participating in decisions within a school’s purview. • As of July 2022, the authorizer has hired new staff members who are working to put new practices in place, including consistent communication with its schools as well as comprehensive oversight and monitoring systems. <p>Identified Areas for Growth</p> <ul style="list-style-type: none"> • The authorizer’s charter agreements lack clearly defined rights and responsibilities of the school, annual performance standards, and the criteria for renewal, non-renewal, and revocation decisions. • The authorizer lacks consistent compliance and performance monitoring systems, such as a formal site visit with stated purposes and direct alignment to performance outcomes and a comprehensive accountability and performance monitoring system to ensure student rights are protected and the terms of the charter agreement are followed. • The authorizer has not established an intervention policy that outlines and clearly communicates a problem-solving process, states the conditions that may trigger intervention, allows reasonable time for remediation, and preserves school autonomy and responsibility. <p>Required Follow Up Actions</p> <ul style="list-style-type: none"> • Submission of a corrective action plan approved by the State Board’s executive director prior to implementation, which includes the required follow-up actions stated in the attached letter. • Submission of a self-assessment in the 2023-24 school year with documentation demonstrating completion of the required follow-up actions outlined in the approved corrective action plan. 	

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Overall Ratings Summary

Standard		Rating (0-4)	Average
1a	Planning and Commitment to Excellence	1.5	1.3
1b	Human Resources	1.6	
1c	Financial Resources	1	
2a	Application Proposal Information, Questions, and Guidance	N/A	N/A
2b	Fair, Transparent, Quality-Focused Procedures	N/A	
2c	Rigorous Approval Criteria	N/A	
2d	Rigorous Decision Making	N/A	
2e	Elements for Existing School Operators or Replicators (if applicable)	N/A	
2f	Elements for Applicants Proposing to Contract with Educational Service Providers, including Charter Management Organizations (if applicable)	N/A	
3a	Charter Agreement Term, Negotiation, and Execution	3.4	2.1
3b	Rights and Responsibilities	1.5	
3c	Performance Standards	1.5	
3d	Provisions for Educational Service Provider (ESP) Contracts (if applicable)	N/A	
3e	ESP Contracts Additional Provisions.	N/A	
4a	Performance Evaluation and Compliance Monitoring	1.6	1.4
4b	Respecting School Autonomy	2.7	
4c	Protecting Student Rights	1	
4d	School Intervention	1	
4e	Public Reporting	1	
5a	Revocation	1	1.1
5b	Renewal Decisions Based on Merit and Inclusive Evidence	N/A	
5c	Cumulative Report and Renewal Application	1	
5d	Fair, Transparent Process	1.5	
5e	Closure	1	
6	Advanced Standard (Bonus)	0.5	0.5
Overall Rating		1.5 Approaching Satisfactory	

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Standard 1a - Planning and Commitment to Excellence		0	1	2	3	4
Sub-standards						
i.	Supports and advances the purposes of charter school law.		1			
ii.	Ensures that the authorizer's local board of education or authorizing board, leadership, and staff understand and are committed to the quality charter authorizing principles and standards and developing as authorizing professionals.		1			
iii.	Defines external relationships and lines of authority to protect its authorizing functions from conflicts of interest and political influence.		1			
iv.	Implements policies, processes, and practices that streamline and systematize its work toward stated goals and executes its duties efficiently while minimizing administrative burdens on schools.			2		
v.	Evaluates its work regularly against national and state standards for quality authorizing and recognized effective practices and develops and implements timely plans for improvement when necessary.			2		
vi.	States a clear mission for quality authorizing.			2		
vii.	Makes authorizing decisions that will result in positive student outcomes, in accordance with state law.	N/A				
Standard Rating						1.5
Evaluative Comments:						
i.	While the school performance framework addresses two (2) of the six (6) purposes of charter school law, the documentation does not demonstrate how the authorizer provides options for parents, encourages the use of different and innovate teaching methods, creates new opportunities for teachers, or affords parents meaningful opportunities to participate in the education of their children. Additionally, the documentation does not demonstrate advancing any of the purposes ² .					
ii.	The documentation included presentation materials for two (2) authorizer development sessions led by the State Board; however, the documentation does not make evident who attended the sessions, one of which occurred outside of the review term, and no other documentation was provided demonstrating that the authorizer ensures its leadership and staff are committed to the quality standards and developing as authorizing professionals.					

² Tennessee Code Annotated (T.C.A). § 49-13-102 states the six (6) purposes of a charter school: improve learning for all students and close the achievement gap between high and low students; provide options for parents to meet educational needs of students; encourage the use of different and innovative teaching methods, and provide greater decision making authority to schools and teachers in exchange for greater responsibility for student performance; measure performance of pupils and faculty, and ensure that children have the opportunity to reach proficiency on state academic assessments; create new professional opportunities for teachers; and afford parents substantial meaningful opportunities to participate in the education of their children.

- iii. While the narrative states that the authorizer employs a conflict of interest policy and the authorizer mentioned a policy during the document debrief, the submitted policy is from another authorizer and no other documentation was provided.
- iv. While the authorizer provided some evidence of implementation of its authorizing processes and practices (e.g., desktop monitoring manual, compliance tracker, monthly CMO meetings) that help to streamline work and minimize administrative burden, the documentation does not include evidence of implementation prior to the start of the 2022-23 school year or any stated authorizing goals or policies.
- v. While the authorizer completed a self-assessment as required for this evaluation, neither the narrative or documentation includes evidence of the authorizer developing and implementing timely plans for improvement because of its assessment nor evidence related to evaluating its work outside of this evaluation.
- vi. The school performance framework presentation includes a mission statement that reads, “The Accountability team’s mission is to support transparency into ASD school performance and recommend school and operator action decisions to ASD leadership”; however, the statement is specific to a team within the authorizer’s office rather than the authorizer, and the document is from 2015.
- vii. N/A – The authorizer did not make any new start, amendment, renewal, or revocation decisions during the review term.

Standard 1b - Human Resources		0	1	2	3	4
Sub-standards						
i.	Through intra- or inter-agency collaborations, contractual relationships and/or staff, enlists expertise and competent leadership for all areas essential to charter school oversight—including, but not limited to, education leadership; instruction; 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.			2		
ii.	Employs competent personnel at a staffing level appropriate and sufficient to carry out all authorizing responsibilities in accordance with national and state standards, and commensurate with the scale of the charter school portfolio.			2		
iii.	Demonstrates an on-going commitment to developing and retaining authorizing staff members and provides regular professional development for the agency's leadership and local board of education or authorizing board to achieve and maintain high standards of professional authorizing practice and to enable continual agency improvement.		1			
Standard Rating						1.6

Evaluative Comments:	
i.	While resumes for eight (8) of the 14 dedicated staff members and four (4) shared staff members included in the organizational chart were provided and the narrative states that the authorizer receives staffing support from the Department of Education in the areas of law, finance, federal programs oversight, and human resource management, the documentation does not include resumes for all staff members or documented evidence of staff expertise in special education, English learners, or facilities.
ii.	While the organizational chart demonstrates a staffing level appropriate with the scale of the portfolio (i.e., 14 dedicated staff members and 4 shared staff members for a portfolio of 16 schools), there are three (3) vacancies, and the documentation lacks job descriptions for ten (10) positions; therefore, it cannot be discerned if all authorizing responsibilities are fulfilled. While this did not impact the score, during the document debrief, the authorizer noted that all positions have been filled.
iii.	The documentation included presentation materials for two (2) professional development sessions; however, only one (1) occurred within the review term and the documentation does not make evident which staff members attended the session. No further evidence demonstrating an on-going commitment to developing and retaining staff or to achieving and maintaining high standards of professional authorizing practice for the authorizer's leadership and staff during the review term was provided.

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 statute, including all relevant requirements for use of the authorizer fee.		1			
ii.	Structures its funding in a manner that avoids conflicts of interest, inducements, incentives, or disincentives that might compromise its judgment in charter approval and accountability decision making.		1			
iii.	Deploys funds effectively, transparently, and efficiently with the public and student interests in mind.		1			
iv.	Annually reports the authorizing obligations fulfilled using the authorizer fee in accordance with state law.		1			
Standard Rating						1

Evaluative Comments:	
i.	While the documentation included an authorizer fee budget that outlines how the authorizer intends to use the collected fee (e.g., staffing, contracted services), the budget is for fiscal year 2023 (“FY23”), which is outside the review term, and lacks clear descriptions of expenses. Additionally, none of the authorizing budgets or authorizer fee reports from the 2019-20 or 2020-21 school years were provided. Therefore, it cannot be ascertained if the authorizer’s use of its collected fee is in accordance with state law and State Board rule.
ii.	The authorizer’s documentation does not include any signed conflict of interest statements or documented evidence of funding sources and spending within the review term beyond a budget for FY23. Additionally, though the authorizer submitted a conflict of interest policy, the policy was from another authorizer; therefore, it cannot be ascertained if the authorizer structures its funding to avoid conflicts of interest. Additionally, while having no impact on the score, the school leaders discussed perceived issues in the way funding was structured across the portfolio when the authorizer operated its direct-run schools.
iii.	While the narrative describes a process for efficiently deploying funds, the documentation does not include evidence of transparently publishing funding details on its website or with its schools. Additionally, though the FY23 authorizer fee budget demonstrates that the authorizer intends to utilize all funds to cover its obligation costs effectively, the operating budgets during the review term were not provided.
iv.	While the authorizer’s narrative includes an active link to the Department of Education’s website where authorizing budgets and fee reports are posted, a screenshot documenting the budgets were posted during the review term was not provided. Additionally, state law requires two (2) funding reports (an authorizing budget and an authorizer fee report), and neither were provided. The authorizer submitted an FY23 budget, which is outside of the review term.

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Standard 2a - Proposal Information, Questions, and Guidance		0	1	2	3	4
Sub-standards						
i.	Issues a charter application information packet or request for proposals (RFP) that: a) States any chartering priorities the authorizer may have established; b) Articulates comprehensive application questions to elicit the information needed for rigorous evaluation of applicants' plans and capacities; and c) Provides clear guidance and requirements regarding application content and format, while explaining evaluation criteria.			N/A		
ii.	Welcomes proposals from first-time charter applicants as well as existing school operators/replicators, while appropriately distinguishing between the two kinds of applicants in proposal requirements and evaluation criteria.			N/A		
iii.	Encourages expansion of charter schools that demonstrate academic success, financial viability, organizational health, and capacity for growth.			N/A		
iv.	Encourages replication of charter schools that demonstrate academic success, financial viability, organizational health, and capacity for growth.			N/A		
v.	Considers diverse educational philosophies and approaches.			N/A		
vi.	Requires applicants to demonstrate capacity to serve students with diverse needs, such as students with disabilities or learning exceptionalities and English learners.			N/A		
Standard Rating						N/A
Evaluative Comments:						
N/A – Tennessee law did not allow the authorizer to accept charter school applications during the review term.						

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Standard 2b - Fair, Transparent, Quality-Focused Procedures		0	1	2	3	4
Sub-standards						
i.	Implements a charter application process that is open, well-publicized, and transparent, and is organized around clear, realistic timelines.			N/A		
ii.	Allows sufficient time for each stage of the application and school pre-opening process to be carried out with quality and integrity.			N/A		
iii.	Explains how each stage of the application process is conducted and evaluated.			N/A		
iv.	Communicates the education needs of the district, the charter authorizing processes, approval criteria, and decisions clearly to the public.			N/A		
v.	Informs applicants of their rights and responsibilities and promptly notifies applicants of approval or denial, while explaining the 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.			N/A		
Standard Rating						N/A
Evaluative Comments:						
N/A – Tennessee law did not allow the authorizer to accept charter school applications during the review term.						

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Standard 2c - Rigorous Approval Criteria Sub-standards	0	1	2	3	4
i. 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, effective governance and management structures and systems, founding team members demonstrating diverse and necessary capabilities in all phases of the school’s development, and clear evidence of the applicant’s capacity to execute its plan successfully.	N/A				
ii. Establishes distinct requirements and criteria for applicants who are existing school operators or replicators.	N/A				
iii. Establishes distinct requirements and criteria for applicants proposing to contract with educational service providers (ESPs), including charter management organizations.	N/A				
Standard Rating					N/A
Evaluative Comments:					
N/A – Tennessee law did not allow the authorizer to accept charter school applications during the review term.					

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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.			N/A		
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, conducted by knowledgeable and competent evaluators.			N/A		
iii. Engages, for both written application reviews and applicant interviews, highly competent teams of internal and external evaluators with relevant educational, organizational (governance and management), financial, and legal expertise, as well as thorough understanding of the essential principles of charter school autonomy and accountability.			N/A		
iv. Provides orientation or training to application evaluators (including interviewers) to ensure consistent evaluation standards and practices, the elimination of real or perceived conflicts of interest, the observance of essential protocols, and the fair, unbiased treatment of all applicants.			N/A		
v. 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 reviewers or decision makers and applicants.			N/A		
vi. Approves applications that are comprised of a detailed plan for charter school opening, operation, and fiscal stability, with little substantive work left for later development.			N/A		
Standard Rating					N/A
Evaluative Comments:					
N/A – Tennessee law did not allow the authorizer to accept charter school applications during the review term.					

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Standard 2e - Elements for Existing School Operators or Applications (if applicable)	0	1	2	3	4
Sub-standards					
i. Provide clear evidence of their capacity to operate new schools successfully while maintaining quality in existing schools;			N/A		
ii. Document their educational, organizational, and financial performance records based on all existing schools;			N/A		
iii. Explain any never-opened, terminated, or non-renewed schools (including terminated or non-renewed third-party contracts to operate schools);			N/A		
iv. Present their growth plan, business plan, and most recent financial audits;			N/A		
v. Meet high standards of academic, organizational, and financial success to earn approval for replication; and			N/A		
vi. Document any current or past litigation and the resolution of such litigation.			N/A		
Standard Rating					N/A
Evaluative Comments:					
N/A – Tennessee law did not allow the authorizer to accept charter school applications during the review term.					

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Standard 2f - Elements for Applicants Proposing to Contract with Educational Service Providers, including Charter Management Organizations (if applicable)		0	1	2	3	4
Sub-standards						
i.	Evidence of the service provider’s educational and management success;			N/A		
ii.	A description of the process for selecting the ESP;			N/A		
iii.	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 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			N/A		
iv.	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.			N/A		
Standard Rating						N/A
Evaluative Comments:						
N/A – Tennessee law did not allow the authorizer to accept charter school applications during the review term.						

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Standard 3a - Charter Agreement Term, Negotiation, and Execution		0	1	2	3	4
Sub-standards						
i.	Executes a charter agreement with a legally incorporated governing board independent of the authorizer.					4
ii.	Grants charter agreements for an initial term of ten operating years with a high-stakes review every five years, in addition to annual performance reports.			2		
iii.	Defines material and non-material terms of the charter agreement.					4
iv.	Ensures mutual understanding and acceptance of the terms of the charter agreement by the school's governing board.					4
v.	Allows—and requires charter agreement amendments for—occasional material changes to a school's plans but does not require amending the charter agreement for non-material modifications.				3	
Standard Rating						3.4

Evaluative Comments:

i.	The charter agreements for the two (2) selected schools explicitly name the incorporated governing board and the authorizer in the first paragraph of the contract.
ii.	The charter agreement for selected school A. documents the agreement's 10-year term in Section 1 and states that the authorizer shall conduct an "annual audit" and "publicly report annually schools' performance" in Section 9; however, the agreement does not define a high-stakes review every five (5) years, as required in law. The charter agreement for selected school B. also documents the agreement's 10-year term in Section 1; however, while the agreement states that the authorizer "plans to conduct non-evaluative school practice reviews annually and scheduled comprehensive site visits that inform school action decisions in years three, five and nine of operation," there is no mention of an annual performance report or a high-stakes review every five (5) years, as required in law.
iii.	The charter agreements for the two (2) selected schools define the material and non-material terms in Section 3.1. Though this did not impact the score, the State Board recommends amending the charter agreements to ensure that all material terms included in the TN Public Charter School Commission's amendment petition rule, at a minimum, are defined as material changes in the charter agreement.
iv.	The charter agreements for selected schools A. and B. demonstrate mutual understanding and acceptance of the agreement's terms with the signatures of the governing board president, executive director, and the authorizer.
v.	While Section 3.1 of the charter agreement for the two (2) selected schools require material changes be reviewed by the authorizer prior to implementation and include a list of changes that require approval, the documents do not include a timeline or process for amending the agreement in alignment with state law and the Tennessee Public Charter School Commission's amendment rule. Additionally, school leaders were uncertain if they had the option to amend their agreements and were unaware of a process to do so.

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Standard 3b - Rights and Responsibilities Sub-standards	0	1	2	3	4
i. Executes charter agreements that clearly: <ul style="list-style-type: none"> a. State the rights and responsibilities of the school and the authorizer; b. State and respect the autonomies to which schools are entitled—based on statute, waiver, or authorizer policy—including those relating to the school’s authority over educational programming, staffing, budgeting, and scheduling; c. Define performance standards, criteria, and conditions for renewal, intervention, revocation, and non-renewal, while establishing the consequences for meeting or not meeting standards or conditions; d. State the statutory, regulatory, and procedural terms and conditions for the school’s operation; e. State reasonable pre-opening requirements or conditions for new schools to ensure that they meet all health, safety, and other legal requirements prior to opening and are prepared to open smoothly; f. State the responsibility and commitment of the school to adhere to essential public-education obligations, including admitting and serving all eligible students so long as space is available, and not expelling or counseling out students except pursuant to a legal discipline policy approved by the authorizer; and g. State the responsibilities of the school and the authorizer in the event of school closures. 		1			
ii. Ensures that any fee-based services that the authorizer provides are set forth in a services agreement that respects charter school autonomy and treats the charter school equitably compared to district schools, if applicable; and ensures that purchasing such services is explicitly not a condition of charter approval, continuation, or renewal.			2		
Standard Rating					1.5
Evaluative Comments:					

- i. While the charter agreements for selected schools A. and B. state some of the requirements of this sub-standard, the agreements do not address the schools' authority over its educational programming, staffing, and scheduling; do not define the performance standards for renewal, intervention, revocation, or non-renewal; do not state pre-opening requirements or conditions for schools prior to opening; do not state the responsibility of admitting and serving all eligible students while not expelling or counseling out students except pursuant to a legal discipline policy approved by the authorizer; and do not state the responsibilities of the school and the authorizer in the event of closure.
- ii. While the charter agreements for selected schools A. and B. included a section (3.2.1.e) regarding fee-based services, the agreement did not clearly state that the service is not a condition of approval or renewal.

Standard 3c - Performance Standards Sub-standards	0	1	2	3	4
i. Executes charter agreements that plainly: <ul style="list-style-type: none"> a. Establish the performance standards under which schools will be evaluated, using objective and verifiable measures of student achievement as the primary measure of school quality, in accordance with state law; b. Define clear, measurable, and attainable academic, financial, and organizational performance standards and targets that the school must meet as a condition of renewal, including but not limited to state and federal measures; c. Include expectations for appropriate access, education, support services, and outcomes for students with disabilities; d. Define the sources of academic data that will form the evidence base for ongoing and renewal evaluation, including state-mandated and other standardized assessments, student academic growth measures, internal assessments, qualitative reviews, and performance comparisons with other public schools in the district and state; e. Define the sources of financial data that will form the evidence base for ongoing and renewal evaluation, grounded in professional standards for sound financial operations and sustainability; f. Define the sources of organizational data that will form the evidence base for ongoing and renewal evaluation, focusing on fulfillment of legal obligations, fiduciary duties, and sound public stewardship; and g. Include clear, measurable performance standards to judge the effectiveness of alternative model schools, as defined by state law—requiring and appropriately weighting rigorous mission-specific performance measures and metrics that credibly demonstrate each school’s success in fulfilling its mission and serving its special population. 		1			
ii. Sets detailed performance standards. Performance standards enable schools and authorizers to know the outcomes for which authorizers will hold schools accountable. They are the basis for school evaluation and should be incorporated in the charter agreement, commonly as an attachment. Academic, financial, and organizational performance standards should include clearly defined and measurable indicators, measures, metrics, and targets that: <ul style="list-style-type: none"> a) Academic Performance <ul style="list-style-type: none"> 1. Set expectations for student academic achievement status or proficiency, including comparative proficiency; 			2		

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<ul style="list-style-type: none"> 2. Set expectations for student academic growth, including adequacy of growth toward state standards; 3. Incorporate state and federal accountability systems, including state grading and/or rating systems; 4. Set expectations for postsecondary readiness, including graduation rates (for high schools); and 5. 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. <p>b) Financial Performance</p> <ul style="list-style-type: none"> 1. Enable the authorizer to monitor and evaluate the school’s financial stability and viability based on short-term performance; and 2. Enable the authorizer to monitor and evaluate the school’s long-term financial sustainability. <p>c) Organizational Performance</p> <ul style="list-style-type: none"> 1. Define the essential elements of the educational program for which the authorizer will hold the school accountable; 2. Define financial management and oversight standards based on generally accepted accounting principles; 3. Hold school governing boards accountable for meeting statutory and board-established operating and reporting requirements; 4. Ensure school compliance with student and employee rights and obligations; and 5. Establish expectations related to the school environment, including health and safety, transportation, facilities, and appropriate handling of records. 					
Standard Rating					1.5

Evaluative Comments:

- i. Section 3.9 of the charter agreements for selected schools A. and B. set general school performance expectations (e.g., completion of an annual threshold test, meeting school accountability goals to remain authorized) and references a school performance framework with indicators, metrics, and targets. However, while the agreement for selected school A. refers to the school performance framework as Exhibit 4, it was not attached, and the agreement for selected school B. included a hyperlink to the school performance framework that was inaccessible. Furthermore, the agreements do not define the sources of academic, organizational, or financial data to inform ongoing evaluation.
- ii. While the performance framework set forth in the charter agreement for both selected schools was not included with the agreement, the authorizer provided a school performance framework presentation from 2015 and a report template for the 2019-20 school year. Within the performance framework documentation, the academic, financial, and organizational performance standards meet most of the expectations stated in this sub-standard; however, indicators that set academic comparative performance expectations and mission-specific performance measures, define financial management and oversight standards (e.g., reporting and generally accepted accounting principles), hold governing boards accountable (e.g., governance requirements, accountability, reporting), and establish expectations related to all aspects of the school environment (e.g., transportation, records) are not measured by the framework.

Standard 3d - Provisions for Educational Service Provider (ESP) Within Charter Agreement (if applicable) Sub-standards	0	1	2	3	4
i. Includes, for any school that contracts with an ESP provider for the management of its educational program, finances, or school operations, contractual provisions that: ³ <ol style="list-style-type: none"> a. Clearly establish the primacy of the charter agreement over the ESP contract; b. Clearly identify the school governing board as the party ultimately responsible for the success or failure of the school, and clearly define the ESP as a vendor of services; c. Prohibit the ESP from selecting, approving, employing, compensating, or serving as school governing board members; d. Provide for sufficient transparency around the spending of public monies; and e. Require all instructional materials, furnishings, and equipment purchased or developed with public funds to be the property of the school, not the ESP, in compliance with state law. 	N/A				
Standard Rating					N/A
Evaluative Comments:					
N/A – The authorizer’s charter schools do not have the option to contract with an ESP provider.					

³ 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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Standard 3e - Provisions for ESP Contract	0	1	2	3	4
Sub-standards					
i. The roles and responsibilities of the school governing board and the ESP, including all services to be provided under the contract;			N/A		
ii. The performance measures, consequences, and mechanisms by which the school governing board will hold the ESP accountable for performance, aligned with the performance measures in the charter agreement;			N/A		
iii. All compensation to be paid to the ESP including all fees, bonuses, and what such compensation includes or requires;			N/A		
iv. Terms of any facility agreement that may be part of the relationship;			N/A		
v. Financial reporting requirements and provisions for the school governing board's financial oversight;			N/A		
vi. 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		
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;			N/A		
viii. Provisions for contract termination; and			N/A		
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.			N/A		
Standard Rating					N/A
Evaluative Comments:					
N/A – The authorizer's charter schools do not have the option to contract with an ESP provider.					

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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 and provides the information necessary to make rigorous and standards-based renewal, revocation, and intervention decisions.			2		
ii. Defines and communicates to schools the process, methods, and timing of gathering and reporting school performance and compliance data.				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.				3	
iv. Provides clear technical guidance to schools as needed to ensure timely compliance with applicable rules and regulations.					4
v. Visits each school as appropriate and necessary 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			
vi. 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			
vii. Requires and reviews annual financial audits of schools, conducted by a qualified independent auditor.		1			
viii. Communicates regularly with schools as needed, including both the school leaders and governing boards, and provides timely notice of contract violations or performance deficiencies.		1			
ix. Provides an annual written report to each school, summarizing its performance and compliance to date and identifying areas of strength and areas needing improvement.		1			
x. Articulates and enforces stated consequences for failing to meet performance expectations or compliance requirements.		1			
Standard Rating					1.6

Evaluative Comments:

- i. The desktop monitoring guidance outlines an accountability and compliance monitoring system that consists of 11 indicators, potential documentation evidence, and a year-long monitoring timeline. Additionally, the compliance tracker demonstrates how the authorizer monitors school compliance and corrective actions, as needed; however, there is limited evidence of implementation as these processes began at the start of the 2022-23 school year, as confirmed by the authorizer during the document debrief. Additionally, it is unclear how the desktop monitoring indicators align with the performance framework or how the information gathered informs revocation or intervention decisions. Furthermore, the documentation does not include evidence from the selected schools for this standard.
- ii. The monthly CMO meeting agenda documents that the authorizer defines and communicates the process, methods, and timing of gathering and reporting school compliance data outlined in the desktop monitoring guidance. However, the documentation does not include evidence of gathering and reporting performance and compliance data prior to the start of the 2022-23 school year or any documentation from the selected schools for this standard.
- iii. The desktop monitoring guidance cites the state and federal requirements aligned to each of its monitoring indicators and was included as an agenda item during the August CMO meeting, thus providing schools with advance notice to minimize administrative burden. However, the documentation does not include evidence of implementation prior to the 2022-23 school year.
- iv. The migrant and foster care manuals and monthly meeting agendas demonstrate ways in which the authorizer provides technical guidance to schools to ensure timely compliance. School leaders also shared that the authorizer provides support to schools, such as preparing for a state-monitoring visit.
- v. While the school leaders provided examples of school visits conducted by the authorizer and the authorizer described monthly in-person meetings and regular classroom visits during the document debrief, there was no documented evidence of the authorizer establishing a process for school visits or conducting school site visits during the review term. While this did not impact the score, monthly in-person meetings (with some including classroom visits) for each school can create operational interference and an administrative burden on the schools.
- vi. While the narrative states that the authorizer formally evaluates the schools in its portfolio annually and the authorizer shared during the document debrief that schools receive quarterly progress updates, there is no documented evidence of the reports or evidence of communication with school leaders regarding performance during the review term. Additionally, school leaders noted that annual evaluations have been conducted inconsistently throughout the review term.
- vii. While the performance framework includes an indicator that evaluates the annual financial audit of a school and a copy of a school's financial audit was provided, the audit is for a school outside of the selected schools for this standard. Additionally, there is no evidence of the selected schools for this standard, or any schools within the portfolio, being evaluated against the framework, though school leaders acknowledged that this does inconsistently occur.
- viii. Though the August CMO meeting agenda demonstrates some communication with schools, the agenda is the only form of evidence provided that occurred within the review term, and there is no documentation demonstrating communication with the selected schools for this standard. Furthermore, while a letter of non-compliance was submitted, the letter was dated outside of the review term, and no further documentation was included to demonstrate how the authorizer communicates notice of contract violations or performance deficiencies.
- ix. While the narrative states that schools receive an annual written report, the documentation did not include any annual reports or other documents summarizing charter schools' performance and compliance to date. Additionally, the documentation did not make evident how the authorizer identifies areas of strength and/or needing improvement for the selected schools or any school within the authorizer's portfolio.

- x. While a letter of non-compliance stated the possibility of escalated consequences for failing to ensure all teachers are fully licensed, the letter was dated outside of the review term, and no further evidence of articulating and enforcing any failure to meet expectations was provided.

Standard 4b - Respecting School Autonomy		0	1	2	3	4
Sub-standards						
i.	Respects the school's authority over its day-to-day operations.					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.	Periodically 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			
iv.	Refrains from directing or participating in educational decisions or choices that are appropriately within a school's purview under the charter law or contract.					4
Standard Rating						2.7

Evaluative Comments:	
i.	There is no documented evidence of the authorizer compromising its schools' operational authority. While this did not impact the score, school leaders shared an opinion that previous authorizing staff had infringed on school authority, though school leaders stated that this has not occurred since the new authorizing staff joined in July 2022. Additionally, during the document debrief, the authorizer described revising discipline-related documents to provide schools with more autonomy than the previous authorizing staff allowed.
ii.	While desktop monitoring guidance provides details about required performance and compliance information, the documentation did not include evidence of collecting information from the selected schools for this standard. Additionally, school leaders shared opinions that the authorizer creates an administrative burden by requesting documentation beyond what is included in the guidance document.
iii.	There is no documented evidence of the authorizer periodically reviewing compliance requirements or evaluating the potential to increase school autonomy within the review term. However, during the document debrief, the authorizer described revising discipline-related documents to provide its schools with more autonomy than the previous authorizing staff allowed.
iv.	There is no documented evidence of the authorizer directing or participating in educational decisions that are within the school's purview. The documentation includes a school improvement plan that allows schools to make their own decisions about their annual goals and action steps in alignment with the district's plan.

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.		1			
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, and gifted students.		1			
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.		1			
Standard Rating						1

Evaluative Comments:	
i.	While the authorizer's family handbook outlines its enrollment and lottery processes, the documentation does not make evident that the authorizer ensures its schools follow these practices, such as through a school policy audit or school handbook review.
ii.	While the migrant and foster care manuals demonstrate that the authorizer provides support information for these subgroups of students and the desktop monitoring guidance demonstrates that the authorizer intends to collect data to ensure schools provide equitable access and services to all students, the collection dates occur outside of the review term and evidence of ensuring services for gifted students was not submitted.
iii.	Though the authorizer's family handbook generally discusses some of the school's responsibilities for serving students with disabilities (IEP monitoring, placement, services, discipline), the documentation does not make evident how the authorizer ensures clarity in the roles and responsibilities of charter schools and authorizing staff in serving students with disabilities, such as through a manual or policy. Additionally, while the narrative states that the roles and responsibilities are clearly outlined in the charter agreement, the agreements for selected schools C. and D. were not provided for review.
iv.	While the authorizer's family handbook, remand and appeals process, and discipline policy address student discipline, the discipline policy is in draft form and there is no evidence of the authorizer evaluating the discipline policies, due process, or a parent/community grievance process for the selected schools or any schools in the authorizer's portfolio. Additionally, while the charter agreements for selected schools A. and B. set expectations for discipline, due process and a grievance process, the agreements for selected schools C. and D. were not provided for review.

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.	Gives schools clear, adequate, evidence-based, and timely notice of contract violations or performance deficiencies.		1			
iii.	Allows schools reasonable time and opportunity for remediation in non-emergency situations.		1			
iv.	Applies professional discretion when intervention is needed and considers context and a range of effective solutions.		1			
v.	Where intervention is needed, 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.		1			
Standard Rating						1

Evaluative Comments:	
i.	While the school performance framework presentation outlines the general conditions, actions and consequences used in response to a school's rating (e.g., "A school in its first 3 years of operation that receives a "Does Not Meet" rating in years 2 and 3 of operation will be replaced" and a table with action steps in response to non-compliance), the document is dated outside of the review term and no further evidence of establishing or communicating an intervention policy to schools was provided. During the document debrief, the authorizer affirmed that an intervention policy has not yet been codified, though the authorizer indicated that they have begun implementing intervention steps such as quarterly monitoring, issuance of letters of non-compliance, and the creation of a corrective action template.
ii.	A letter of non-compliance regarding teacher licensure included clear, evidence-based, and timely notice of the contract violation; however, the letter was dated outside of the review term, and no additional documentation was provided.
iii.	A letter of non-compliance regarding teacher licensure allowed the school seven (7) days to respond to the documentation request; however, there is no documentation of remediation or resolution, the letter was dated outside of the review term, and no additional documentation was provided.
iv.	In the absence of an intervention policy, a letter of non-compliance was the only documented evidence demonstrating a form of intervention. However, the documentation does not make evident if the authorizer applies professional discretion when intervention is needed or considers a range of solutions. Additionally, the letter was dated outside of the review term and no additional documentation was provided.
v.	While the letter of non-compliance preserved school responsibility and noted the possibility of escalation should the school remain out of compliance, the letter was dated outside of the review term, and no additional documentation was provided.

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Standard 4e – Public Reporting		0	1	2	3	4
Sub-standards						
i.	Produces an annual public report that provides clear, accurate performance data for the charter schools it oversees and reports on individual school and overall portfolio performance according to the framework set forth in the charter agreement in accordance with State law.		1			
Standard Rating						1
Evaluative Comments:						
i.	Though the narrative form states that an annual report is provided to schools at the end of the school year and is based on their performance on the school performance framework, the documented evidence did not include any annual reports produced within or outside of the review term. The authorizer submitted an annual report for one of its charter schools, which is different from the annual authorizing report required in law.					

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Standard 5a – Revocation		0	1	2	3	4
Sub-standards						
i.	Revokes a charter during the charter term if there is clear evidence of extreme underperformance or violation of law or the public trust that imperils students or public funds, in accordance with state law.		1			
ii.	Does not make revocation decisions on the basis of political or community pressure.	N/A				
Standard Rating						1
Evaluative Comments:						
i.	While the school performance framework presentation includes the option to revoke a charter because of three (3) years of noncompliance, it is unclear how this action step aligns with the reasons for revocation named in state law and no further documentation, such as a full revocation policy, was provided.					
ii.	N/A – The authorizer did not make any revocation decisions during the review term.					

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Standard 5b – Renewal Decisions Based on Merit and Inclusive Evidence		0	1	2	3	4
Sub-standards						
i.	Bases the renewal process and renewal decisions on thorough analyses of a comprehensive body of objective evidence defined by the performance framework in the charter agreement.			N/A		
ii.	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		
iii.	Does not make renewal decisions on the basis of political or community pressure or solely on promises of future improvement.			N/A		
Standard Rating						N/A
Evaluative Comments:						
N/A – The authorizer did not implement a renewal process during the review term.						

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Standard 5c – Cumulative Report and Renewal Application		0	1	2	3	4
Sub-standards						
i.	Provides to each school, in advance of the renewal decision, a cumulative performance report that: <ul style="list-style-type: none"> a. Summarizes the school’s performance record over the charter term; and b. States the authorizer’s summative findings concerning the school’s performance and its prospects for renewal. 	N/A				
ii.	Requires any school seeking renewal to apply for it through a renewal application, which provides the school a 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			
Standard Rating						1
Evaluative Comments:						
i.	N/A – The authorizer did not implement a renewal process during the review term.					
ii.	While the 2021 school transition guide provides information on how a school may exit the district, the documentation is in draft form, and no further documentation aligned to this sub-standard, such as a renewal policy, was provided. Additionally, school leaders affirmed that there is not a formalized renewal process or transition plan at the end of the 10-year charter term, which several schools are either approaching or beyond.					

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Standard 5d – Fair, Transparent Process		0	1	2	3	4
Sub-standards						
i.	Clearly communicates to schools the criteria for charter revocation, renewal, and non-renewal decisions that are consistent with the charter agreement, including any policy changes thereto.		1			
ii.	Promptly notifies each school of its renewal (or, if applicable, revocation) decision, including written explanation of the reasons for the decision.	N/A				
iii.	Promptly communicates renewal or revocation 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				
iv.	Explains in writing any available rights of legal or administrative appeal through which a school may challenge the authorizer’s decision, including appeal to the Tennessee Public Charter School Commission.	N/A				
v.	Regularly updates and publishes the process for renewal decision making, including guidance regarding required content and format for renewal applications.			2		
Standard Rating						1.5
Evaluative Comments:						
i.	While the 2021 school transition guide and school performance framework presentation includes criteria for a school to exit the district, the guide is in draft form and criteria stated within the presentation is vague. The documentation does not make evident how the authorizer communicates to schools the criteria for revocation, renewal, and non-renewal.					
ii.	N/A – The authorizer did not renew any schools during the review term.					
iii.	N/A – The authorizer did not renew or revoke any schools during the review term.					
iv.	N/A – The authorizer did not renew or revoke any schools during the review term.					
v.	The 2021 school transition guide documents the authorizer updating the process for its renewal decisions in accordance with state law; however, the document is in draft form and no evidence of publishing the process was provided.					

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Standard 5e - Closure		0	1	2	3	4
Sub-standards						
i.	In the event of a school closure, oversees and works 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			
Standard Rating						1
Evaluative Comments:						
i.	While the 2021 school transition guide discusses the option for school closure, cites where closure is detailed in state law, and references the charter agreement for closure requirements, and the authorizer described during the document debrief a general process it follows when closing a school, the transition guide is in draft form and no other documentation, such as a closure policy or protocol outlining the required steps in the event of a school closure, was provided. Additionally, though the authorizer closed a school during the review term, documentation of the closing was not provided.					

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Standard 6 - Advanced Standards (Bonus)		0	1	2	3	4
Sub-standards						
i.	Ensures authorizing is visible, adequately resourced, and the people responsible for day-to-day authorizing functions have input over decision making.		1			
ii.	Articulates and implements an intentional strategic vision and plan for chartering, including clear priorities, goals, and time frames for achievement.	0				
iii.	Evaluates its work regularly against its chartering mission and strategic plan goals and implements plans for improvement when falling short of its mission and strategic plan.		1			
iv.	Provides an annual public report on the authorizer's program and performance in meeting its strategic plan goals.	0				
v.	Broadly invites and solicits charter applications while publicizing the authorizer's strategic vision and chartering priorities, without restricting or refusing to review applications that propose to fulfill other goals.	N/A				
Standard Rating						0.5
Evaluative Comments:						
i.	Based on the outcomes of the relevant sub-standards to assess 6i, the authorizer did not satisfy any of the selected sub-standards and addressed less than half ⁴ .					
ii.	The documentation does not include evidence of a strategic vision and plan for authorizing charter schools.					
iii.	While the authorizer completed a self-assessment as part of this evaluation, no further documentation was provided demonstrating that the authorizer evaluates its work regularly against its chartering mission, a strategic plan, or goals or implements plans for improvement.					
iv.	The documentation does not include evidence of an annual public report on the authorizer's program and performance in meeting its strategic plan goals.					
v.	N/A – The authorizer does not currently have the option to invite or solicit charter applications, per state law.					

⁴ The relevant sub-standards used to assess 6i include 1avi, 1avii, 1ci, 2bi, 2biv, 2di, 5aii, and 5bi.