



# A LOOK AT METRO NASHVILLE PUBLIC SCHOOLS

*Case Study Analysis for the  
Quality Practice Project*

The authors would like to thank the authorizing board members and staff, charter school operators, advocacy organizations, and other local actors who provided valuable data, feedback, and insight for this case study. We are also grateful to staff from Public Impact who were thought partners from the beginning of this project, led the data collection and analysis efforts on academic performance, participated in advisory panel meetings, participated in multi-day site visits with NACSA staff, and assisted in making sense of the findings. All content, errors, omissions, and conclusions are solely those of the report's authors.

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## ABOUT NACSA

The National Association of Charter School Authorizers (NACSA) is working to double the number of students in great public charter schools by advancing policies and practices that promote quality, autonomy, and choice. As an independent voice for quality charter school authorizing, NACSA uses data and evidence to encourage smart charter school growth. NACSA works with authorizers and partners to create the gold standard for authorizing and build authorizers' capacity to make informed decisions. NACSA also provides research and information that help policymakers and advocates move past the rhetoric to make evidence-based policy decisions. More at [www.qualitycharters.org](http://www.qualitycharters.org).

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# ABOUT THIS CASE STUDY

The Quality Practice Project (QPP), an initiative of the National Association of Charter School Authorizers (NACSA), is designed to build a stronger evidence base, linking authorizing practices and student outcomes. The purpose of the QPP is to test, broaden, and deepen our knowledge of how and why authorizers do their work and, above all, what authorizing perspectives and practices correlate with strong student and public interest outcomes. By studying the practices of authorizers with a range of performance profiles—with a focus on authorizers with very strong student and public interest outcomes—NACSA hopes to dramatically accelerate the adoption of practices that lead to stronger outcomes for students and communities.

## Outcome-Based Selection

This case study is one of five analyses of authorizers with strong student and public interest outcomes. It represents a description of authorizing perspectives and practices across a number of key domains. The Metropolitan Nashville Public Schools (MNPS) authorizing office was chosen to participate in the QPP and is the focus of this case study. It met a range of rigorous student and public interest outcomes. A complete description of the authorizer selection process, assessment methodology—including the measures and metrics used to assess performance—and case study process can be found [here](#).

In general, authorizers meeting those outcomes have:

- More academically high-performing schools (and associated students) than average-performing schools
- A small proportion of low-performing schools (and students in low-performing schools)
- Schools that are financially viable
- Student enrollment of key socio-demographic groups in the charter school portfolio that is similar or higher than a similarly situated group of schools
- No widespread instances of unethical behavior among schools in their portfolio
- Publicly available data on the academic, financial, and operational performance of individual schools
- No instances of first-year closures

- Closed schools with egregious academic, operational, financial, or unlawful practices
- Closed schools in the bottom 5 percent of academic performance
- Schools with high academic performance that have expanded their enrollment or have replicated to serve more students

## Case Study Generation Process

After the assessment of student and public interest outcomes and authorizer selection, a deep investigation of authorizer perspectives and practices ensued. Following the case study process as outlined by Yin (2015), researchers from NACSA and Public Impact engaged in a range of activities designed to provide a comprehensive description of the approach to authorizing, including:

- **Case Study Protocol:** Building from the domains used by NACSA to evaluate the practices of authorizers as well as the advice of an expert advisory group, researchers created a case study protocol and specific domains of inquiry. Key questions and domains of inquiry can be found [here](#).
- **Document and Artifact Review:** Researchers reviewed a range of documents and artifacts (see [here](#) for documents analyzed). This data was used both to describe authorizing practices and to more clearly focus individual interviews.
- **Interviews and Site Visits:** Researchers spent two days at each QPP site interviewing authorizers and other key stakeholders. The purpose of the site visits was to (a) get clarification on authorizing practices after examining documents and artifacts and (b) more clearly understand how and why authorizers engage in specific practices. Individual and small group interviews were conducted at each site. The majority of interviews were with authorizers (e.g., day-to-day decision makers, board members), but researchers also interviewed other key stakeholders (e.g., school operators, charter support organizations) to deepen and triangulate data analysis. The site visit for MNPS was June 8-9, 2016.<sup>1</sup>

<sup>1</sup> Data for this case study was collected and analyzed prior to the naming of Dr. Shawn Joseph as Director of Schools (and new staff he brought into the district, including to manage the Office of Charter Schools) and the MNPS school board elections in August 2016.

- **Member Check:** Draft case studies were shared with authorizers and other key stakeholders at each site. Changes were made to the case study based on feedback received from stakeholders.

## Purpose and Use of This Case Study

This is a case study of practices and perspectives of one authorizer that has a portfolio of schools achieving strong results, and caution should be used in making strong claims—good or bad—from it exclusively. Drawing causal inferences between authorizer practices and outcomes based solely on this case study are inappropriate; a high-performing sector of charter schools is inclusive of, not exclusively determined by, authorizer perspectives and practices. In addition, this case study is intentionally descriptive, not evaluative. It is not designed to evaluate authorizer practices against any standard of performance, and the case study does not comment on the degree to which an authorizer’s practices are “good” or “bad.” While this case study may be instructive to the field on its own, it is best used in conjunction with other case studies of authorizers with strong practices. We strongly encourage readers to also view NACSA’s summary of similarities and differences across QPP authorizers, found [here](#).

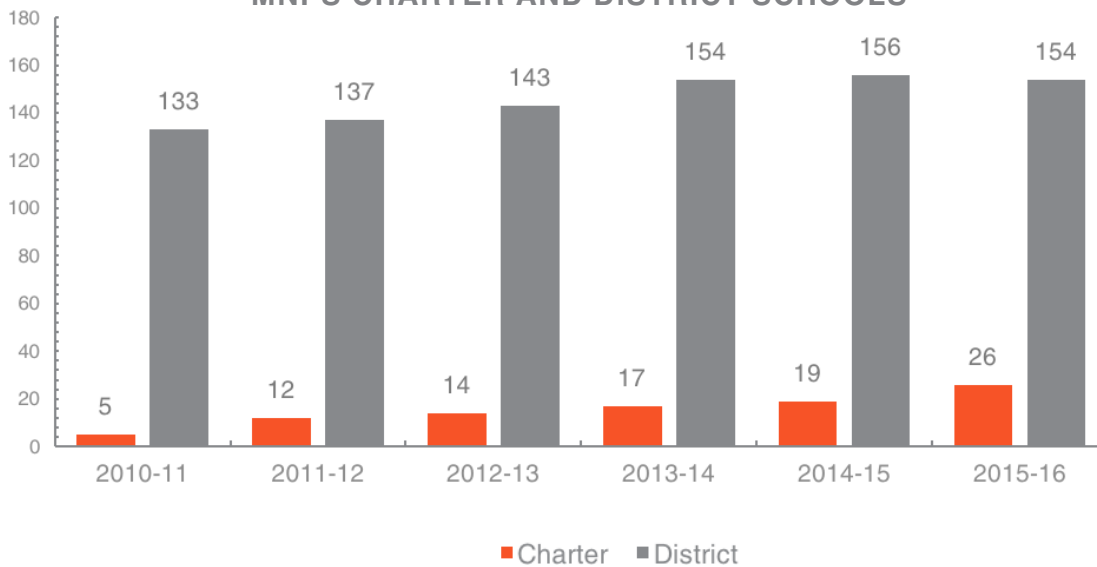
Descriptions of practices are current as of the development of this case study, typically 3-6 months after the site visit. Changes in authorizing philosophy, staff, and practices made after that time are not reflected in this case study.

# ABOUT THE AUTHORIZER

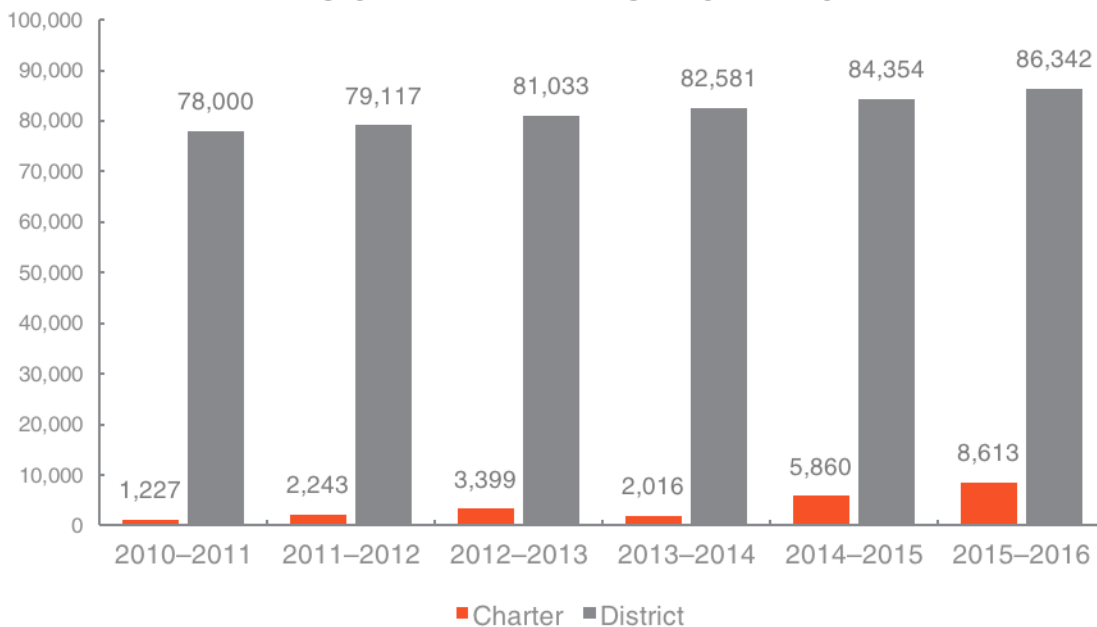
## Metropolitan Nashville Public Schools

TENNESSEE AUTHORIZERS	SCHOOLS (2015–16)
Shelby County Public Schools	46
Metropolitan Nashville Public Schools	25
Tennessee Achievement School District	23
Hamilton County Department of Education	4
Knox County Public Schools	1

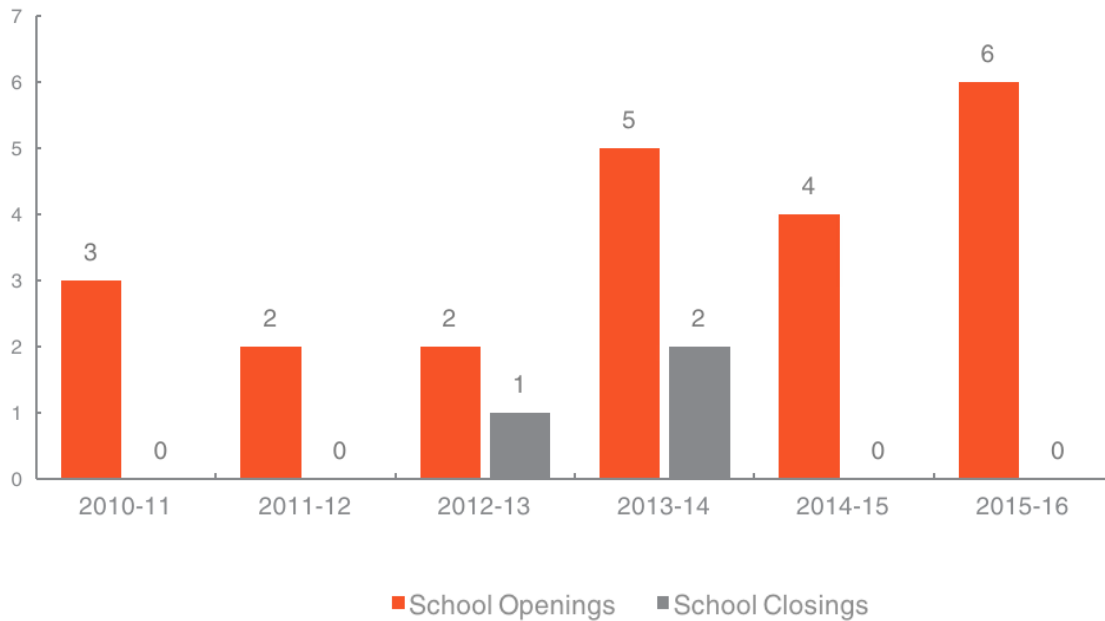
### MNPS CHARTER AND DISTRICT SCHOOLS



### MNPS CHARTER AND DISTRICT ENROLLMENT



## MNPS CHARTER SCHOOL OPENINGS AND CLOSINGS



### Key Facts on Authorizing and Policy Context

- Tennessee charter legislation passed in 2002, the 39th state to pass charter legislation.
- Tennessee’s original charter law has been described as restrictive, as it had a cap of 50 schools, had geographic restrictions on where schools could operate, allowed only students that were academically unsuccessful or were in academically unsuccessful schools to attend charter schools, and allowed only certain local school districts to be authorizers (Nashville and Memphis).
- Legislation from 2009 to 2011 included a number of sweeping educational reforms, including raising and then eliminating the cap on charter schools, expanding student eligibility to attend charter schools, and expanding authorizing, including the establishment of the Achievement School District (designed to improve the performance of the lowest five percent of schools in the state) and the Tennessee State Board of Education (on appeal of denied charter petitions only).
- Tennessee was one of 19 states to receive a federal Race to the Top Grant in 2010. A significant portion of its \$502 million award and significant amounts of national and local philanthropy were designed to grow the number and quality of charter schools in the state and in Nashville specifically.
- MNPS was one of nine inaugural cities to adopt a District-Charter Collaboration Compact in 2009.
- Use of nationally recognized authorizer standards is required by Tennessee authorizers.
- State law does not require or provide for authorizer evaluations or authorizer sanctions.
- State law calls for the automatic closure of “priority” schools (the state’s bottom-performing five percent of schools) under certain conditions. Default closure provisions become effective for schools in 2017.



# ORGANIZATIONAL CAPACITY

## Organizational Structure

**Staffing.** Since its founding in 2009, the Office of Charter Schools has had three staff members. The Office has an Executive Director that reports to the district's Director of Schools (Superintendent), a Charter Schools Coordinator who reports to the Executive Director, and an Administrative Assistant. For a period of time when the Office of Charter Schools and Office of Innovation were one office (2011 to 2014), the Executive Director also had leadership and oversight responsibilities for district innovation work and Office of Innovation staff. Office of Innovation staff were precluded, due to the nature of funding sources, from doing charter school work.<sup>2</sup>

The working relationship between the Executive Director and Charter Schools Coordinator is described as collegial and very productive with a lot of overlapping responsibility areas. The Executive Director is described as setting and anchoring the Office's vision and mission, ensuring projects were completed on time, and managing many external relationships. The Charter Schools Coordinator is tasked with managing and facilitating day-to-day authorizing work, with a special emphasis on effectively managing the schools' application processes and functions. Management systems between the two staff members include a combination of formal structures (e.g., weekly meetings, annual goal setting) and informal structures (e.g., frequent, spur-of-the-moment problem solving). The Office relies very heavily on district staff and external stakeholders for executing a number of systems, the application process in particular (described in more detail in the following section and the section on Application Systems and Processes).

**Office of Charter Schools Positioning with Metro Nashville Public Schools.** Since 2009, the Office of Charter Schools appears to be conceptualized as part of the district's central office redesign plan designed to improve student achievement across all subgroups. The office is clearly an integral part of the district, with the Executive Director reporting to the Director of Schools (Superintendent) and with frequent access to governing

board members. Key stakeholders reported that prior to 2009, chartering responsibilities were an afterthought and duties rotated: "It's your turn this year," as articulated by one stakeholder. The district's last two strategic plans, MNPS Achieves (that ran from 2009 to 2013) and Education 2018: Excellence for Every Student (that runs from 2013 to 2018), have had a significant focus on transforming district operations and more clearly position charter schools within the larger district efforts. The district's current strategic plan lists two primary district functions consistent with that re-designed district transformation model: (1) supporting school operations and developing knowledge for effective instruction and (2) accountability for school and system performance. Establishing and holding charter schools accountable are described in the second function area, along with systems to hold all schools accountable for academic performance, promoting diversity, and establishing a collaborative culture among schools and key stakeholders.

The Office has consistently requested, through the district's annual budgeting process, additional resources to expand its charter school team, including requesting resources for another coordinator and staff with expertise in finances, law/contracting, and data analysis. Those requests have not been approved by the district.

## Human Capital Identification and Development

As a part of MNPS, most of the Office of Charter School's human capital systems are the district's human capital systems. Hiring, promotion, and dismissal systems are all determined by district policy and procedures. The district's salary and compensation systems determine both salaries of staff members and any merit-based and/or cost-of-living salary increases; the Office has no discretion on salary and compensation decisions. Given that the Office of Charter Schools has not hired, promoted, or dismissed any staff members since 2010, no descriptions of their talent identification, retention, promotion, or dismissal systems are available to comment on.<sup>3</sup>

<sup>2</sup> The former Executive Director left the district in 2015. The Charter Schools Coordinator assumed the role of Interim Executive Director and, along with the Administrative Assistant, has been the only full-time charter school staff member at MNPS from 2015 through the development of this case study.

<sup>3</sup> The Office of Charter Schools and the Office of Innovation were one unified office until 2014. In 2014, the district elected to separate those offices.

The Office's professional development process can be described as opportunistic. Given limited resources for staff development, the Office actively encourages staff to participate in no-cost district- or state-provided development opportunities, although many of those do not fit well into the tasks associated with the Office's strategic plan. The Office does seek out other external professional development opportunities for staff, including participation in NACSA's Leaders Program and other authorizing-specific opportunities.

## Planning and Priority Setting

**Strategic Plan.** The MNPS Office of Charter Schools has been guided by detailed strategic plans since its founding in 2009. According to staff and the documents reviewed, the strategic plans have been designed to provide the Office a "disciplined approach to the management of the Office of Charter Schools." The Office typically creates strategic plans over a multi-day retreat with all staff participating. Staff are clearly aware of the strategic plan and often describe their work in relation to the goals and strategies described by that plan. Prior to the departure of the Office's Executive Director in 2015, the two primary charter staff members frequently reviewed progress on interim milestones related to their strategies and made mid-course corrections.

The Office of Charter School's 34-page strategic plan is very thorough and detailed. In addition to including a vision, mission statement, and set of beliefs/values about children, authorizing, and schools, the strategic plan also includes a comprehensive analysis of both internal and external strengths, weaknesses, opportunities, and threats. It also benchmarks and thoroughly describes MNPS charter authorizing practices against a set of nearly 100 authorizer standards.

The plan contains one goal: "Positively impact 26,000 students (30 percent of MNPS enrollment) by raising the number of students (to 30,000 or more) enrolled in high-performing schools, and reduce the number enrolled in low-performing schools (to 10,000 or fewer) by 2020." The scale of that goal clearly indicates a desire by the Office to impact not only students in charter schools, but also students in district-run schools. Four measurable strategies and targets designed to facilitate achievement toward that goal are also included:

- **Protecting and expanding the quality of existing schools.** The plan sets targets for increasing the number of seats in high-performing schools, decreasing the number of seats in low-performing schools through closure/non-renewal, and setting overall academic quality benchmarks for all schools in the portfolio.
- **Increasing demand in high-performing schools.** The plan sets targets for charter schools maintaining high utilization rates (e.g., percent enrolled compared to charter plans for enrollment each year) and increasing the number of filled seats in high-performing charter schools.
- **Ensuring equity of access to high-performing schools.** The plan sets targets for more charter schools to meet the district's definition of student diversity, which sets targets to avoid racial/ethnic, income, disability, and language diversity isolation, and sets targets for the charter portfolio overall to relatively closely mirror the district's proportion of low-income students, students with special needs, and English Learners.
- **Deepening collaboration and sharing of best practices.** The plan sets targets to formalize and expand the district-charter compact, establishing a shared practices event across sectors, and establishing an authorizer collaborative in Tennessee.

For each of these four strategies, the Office developed specific action steps, person/people responsible for executing those steps, a timeline, specific evaluation/deliverables, and success metrics.

**Financial Resources Supporting Office Goals.** The Office is financially supported through a district annual allocation, done as part of the district's annual budgeting process, and a \$500 application fee. For the most recent fiscal year (2015-16), the Office was allocated just under \$10,000 in non-staff financial resources for travel/mileage, professional development, association dues, and office supplies, and provided salaries and benefits for two-and-a-half staff members (2.5 FTE).

## Relationships with Entities Outside the Authorizing Office

**District Relationships.** The Office of Charter Schools relies heavily on non-charter school district staff, especially for the application process (see the Application Systems and Processes section for a full description of that relationship). In addition, during the last five years, the district Director of Schools (Superintendent) and Chief Operating Officer have been critical “thought partners,” helping the office navigate district systems and think through high-stakes decisions.

Stakeholders described the relationships between non-charter district staff and charter schools as mostly supportive, due in large part to three factors: (a) district staff being actively involved in the application process, (b) the intentional nature of where the Office of Charter Schools encouraged charter schools to locate, and (c) the active intervention and advocacy of Charter Office staff within the district on behalf of charter schools.

**Active involvement in application process.** Many district staff feel a sense of investment in charter school success in large part due to their active participation in application decisions to grant or deny charters. District staff reported that not only did their active involvement help in understanding charter school plans and getting to know the people interested in establishing those schools, but because Charter Office staff highly value and use their opinions in decision making, they feel that approved charters are part of the larger district’s transformation plans.

**Intentionally locating schools.** Since the founding of the Office of Charter Schools in 2009, Office staff have actively encouraged charter schools to locate in places of need as identified by staff, other district personnel (e.g., Office of Student Assignment and Development), and the district’s governing board. Office of Charter School staff have continuously had active conversations with organizations that help to start new charter schools (e.g., the Tennessee Charter School Incubator) and potential charter applicants and have found those entities receptive to staff guidance on school locations. Office of Charter School staff do not offer any incentives (e.g., facilities) aligning with their preferred locations. A more complete description of how the Office engages in this work is

described in the Strategic/Intentional Authorizing section in the Application System and Processes Domain.

### **Active intervention and advocacy when necessary.**

The ability of the two primary Charter Office staff to intervene and advocate on behalf of charter schools within the larger district is noted as key to MNPS being an effective authorizer in a school district context. The combination of Office staff being both highly respectful of school autonomy yet well respected within the district, especially by the Director of Schools, allows for the Office to “stay out of the hair of schools,” yet having “the juice to get stuff done for the schools” when barriers arise. One key stakeholder noted that the combination of upholding school autonomy and having the ability to navigate inter-district issues is “the only way for a charter office to effectively work in a district context.”

Stakeholders noted such an orientation—including district staff in application processes, being intentional in describing where it would like new schools to open, and being an active intervener in district systems when necessary on behalf of schools—has mitigated some of the animosity that non-charter staff can feel toward charter schools in a school district setting.

During the last five years, stakeholders described some growing pains between charter schools and non-charter staff and functions. Charter schools have the option to be a part of most district services and programs (e.g., food service, transportation), with relatively few areas of required participation (one notable exception is the requirement that charter schools participate in the district’s student management system for state and federal reporting requirements). When charter schools choose to use district systems, it is not always smooth and has had times of significant complication and confrontation. District staff report challenges related to fielding many more questions and having additional engagements with charter schools without additional support from the district. The increasing district-charter interactions have also required Office of Charter Schools staff to spend more time problem solving with non-charter staff on issues and questions and developing systems to address common challenges. Staff noted that there is a benefit to this, however. As staff have to engage with every part of MNPS, they probably know better than anyone in the building how the district operates.

**External Entities.** According to key stakeholders, there are a number of organizations external to MNPS that are important to the creation of a sector of charter schools achieving strong results. As described more fully in the Application System and Processes section, MNPS extensively uses community members and other external stakeholders in participating in charter school application review teams. Stakeholders indicated those people and organizations are invaluable to not only creating strong application recommendations but also engendering community support for new charter schools.

While it is beyond the scope of this analysis to identify all of the other organizations impacting the quality of MNPS charter portfolio, we focus on organizations that worked closely with the MNPS authorizing office and appear to have impacted its authorizing practices.<sup>4</sup> The most notable external entities interfacing with authorizing were organizations designed to help with financial and development support, and the creation of model authorizing policies and practices. The Tennessee Charter School Incubator, Charter School Growth Fund-Tennessee, the Tennessee Department of Education, the Tennessee State Board of Education, and the Tennessee Charter School Center were identified as important contributors to how MNPS engages in authorizing functions. These entities—and the people and other organizations they worked with, including national and local philanthropic organizations and known supply builders, such as Building Excellent Schools—impact the quality of applications MNPS receives, reduces the workload in pre-opening and start-up functions, adds to a culture of quality in Nashville, and aids in the creation of some authorizing policies. Those entities allow MNPS to focus less on supply issues, as they receive a number of high-quality applications from people associated with those entities. In addition, the Tennessee Charter Incubator includes a very rigorous internal application review process and board member training prior to submitting an application, all organized by a former authorizer, designed not only to gain authorization but also to ensure a successful school opening. In addition, stakeholders indicated that those entities and others help

to foster a culture of quality that has a meaningful impact on how stakeholders envision the growth of the charter sector. As indicated by one MNPS stakeholder, “It allowed the drumbeat of quality to dominate how we grew.”

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<sup>4</sup> The reader is encouraged to examine a 2016 report by Public Impact and the Charter School Growth Fund on the charter school sector in Tennessee: Growing a high-quality charter sector: Lessons from Tennessee available at <http://publicimpact.com/growing-a-high-quality-charter-sector-lessons-from-tennessee/>. While the report is about the state of Tennessee, it does an excellent job of describing how state and local work impacted the city of Nashville’s public charter sector including political leadership, advocacy efforts, and other talent supports likely contributing to strong sector performance.

# ORGANIZATIONAL STRUCTURE

## Basic Values

Two statements describe the values orientation of the Metropolitan Nashville School District Charter School Office (the Office). In a 2015 Strategic Plan developed by the Office's former Director, the Office sets out a mission and vision distinct from those of the district. They are both ambitious and specific:

**Vision:** All children and communities empowered through exemplary public schools.

**Mission:** Authorize excellent public schools that change lives.

A belief statement includes the following: "All students can learn and when they are not, it is the adult systems and practices that need to change."

It's this last piece that animates what could simply be lofty phrases about empowerment and changing lives. Under the last two leaders of the Office, the Office sees itself as a catalyst for change—including within the district. Collaborative but impatient, the Office feels a direct responsibility toward students that is its touchstone in relation to both the district and the schools it oversees.

## How Values and Intentions are Communicated

In what basically has been a two-person operation, a literal "office" housed in a larger organization, there are no posters announcing corporate values. The mission and values are restated in an Annual Report but are really communicated by word and deed. Several examples were provided. Office leadership used the phrase "it's all about the kids," contrasting the Office's approach with the lip service that phrase is given in some other parts of the agency and, regrettably, in some schools. Office leadership indicated they have to remind the schools constantly that "all children can learn" when they claim that "we have those kids," meaning students who are learning English, living in poverty, and so on.

Taking a firm stand on quality, early on, was key to the Office's later successes. When three schools were closed in 2012 and 2013, some skeptical school board members were impressed by the leadership and commitment of Office staff and joined "pro-charter" members to form

a solidly positive center in the school board, leading to approval of some of the strongest schools now in the portfolio.

## View of Charters and Relationship to Schools

The Office clearly leans toward two perspectives on the overall function of Nashville's charter sector, although neither is fully realized:

1. **A competitive force for change and improvement in both sectors.** For example, the MNPS portfolio (and Tennessee's Achievement School District) led to creation of Nashville's iZone.
2. **A set of schools that fills in gaps to local district programs/schools.** Although the Office has no power to mandate the type of applications it receives, Office leadership commissioned a "quality seats" survey and uses the results in public meetings and conversations to highlight urgent needs in certain areas of the city.

Stakeholders provided numerous examples of how the Office relates to schools on a day-to-day basis. The schools' interaction with MNPS district offices can be direct (virtually every office in the district engages charters), but if a problem arises they tend to go to the Charter Office first for help. District leadership said the Office is a "conduit" between MNPS and schools. Charter staff used the term "liaison." Both suggest a sort of neutral administrative function, but in fact the Charter Office is both an advocate for schools within the district system and a supportive but firm accountability agent for the schools. This dual role can attract criticism from both angles—one school board member calls the Office "charter zealots."

Given the Office's staffing (of one to three people since its inception), staff cannot be onsite in schools all that often, but there is one formal site visit a year and staff estimate being at schools every few months. So in addition to paper traffic, staff maintain a personal relationship with school leaders. The Office also sends out a weekly School Leaders Update, which is an important information source on reporting, grant opportunities, and other administrative matters.

## External vs. Internal Focus

There was no particular direction or focus—indeed, no Office—until the Office’s founding in 2009. In establishing the Office, the founding Executive Director (who is also a former school board member for MNPS) looked outside the district for guidance, undertaking what he called a “crash course” in charter authorizing. He consulted NACSA and borrowed best practices, tools, and systems from established authorizers. He eventually joined NACSA’s Board of Directors and used that to extend his understanding of issues in policy and practice.

Since 2009, the Office has benefitted from an unusually strong concentration of external partners, for most of that time with a supportive district superintendent but also prominently including former Mayor Karl Dean. He was instrumental in creating a charter school incubator, whose mission has broadened to more general support and now called the Tennessee Charter School Center. Because the Office wanted to look beyond local borders for top-flight school operators, Dean also helped assure national networks that the city would welcome them. That recruitment effort got another boost when the Charter School Growth Fund (CSGF) decided on Nashville as a priority site. CSGF’s presence provided a double bonus: not only could it encourage members of its portfolio to look at Nashville, but by doing what is arguably the most rigorous due-diligence of any funder before investing, it could guarantee that prospective operators had the capacity and track record to succeed in Nashville—which has had a strong impact on the overall quality of the MNPS portfolio.

## Role of Leadership

Multiple stakeholders noted that the Office’s founding Executive Director played an enormous role in the strength of MNPS’s charter portfolio. He had a strong vision about the possibilities of charters and what they needed to thrive (including “predictability” in processes and a wide array of voices involved in approvals and decision about school sites). He tried to think strategically from the outset: anticipating that multiple schools might want to open on the same corner, he obtained a needs assessment from the Student Assignment Office to help guide location choices. He also had a view of a mutually reinforcing relationship to the larger district; for example, he drove for approval of Nashville’s District-Charter Compact funded

by the Bill & Melinda Gates Foundation. Above all, he was eager to learn from new developments, “building this thing as we went along.” His Deputy, who subsequently became the interim successor, has continued on this path despite significant resource constraints.

Their joint tenures also illustrate the limits of leadership in an office that can be submerged when political tides shift. An example, as described by key stakeholders, can be found in the Office’s decision making around an application for a specific operator. An initial decision to turn down one operator generated a storm of controversy and a confrontation with the state Superintendent of Education. Although approved upon appeal (when the state remanded it to MNPS for reconsideration), the decision fueled support for creation of a new statewide authorizer, and eventually led to the departure of both the founding Executive Director and the Director of Schools (Superintendent) at that time. But it should be noted that the initial decision was guided by the same vision and principles that have characterized the Office since 2009: to make sure that all children are well served.

## Growth Mindset

Rather than trying to “let a hundred flowers bloom,” the 2015 Strategic Plan situates the issue of growth in the context of student need: “[W]e realize that charter authorizing is continually evolving and the Office of Charter Schools is committed to progressing in conjunction with the growth and complexity of the ever-growing student and family population that is demanding the high-quality education to which they are entitled.” “Complexity” may be the key word here: the population is not just growing but diversifying by race, income, and language, and the Office specifically commits itself to serving all those different students according to their own learning needs. Thus, having established early on that it is willing to close schools, the Office is not taking an aggressive approach to opening more schools but rather making sure there are enough to serve all students with high-quality performance.

## Entrepreneurial vs. Compliance-driven Attitude

Although the Office has developed systems for oversight (often in collaboration with other MNPS offices), it adopted an entrepreneurial stance early on, including

the external recruiting efforts mentioned above but also with a determination to create positive change within the district. Several charter-bred innovations have been adopted by the larger district. The agency's accountability office claims patrimony for the Academic Performance Framework (APF), now applied to all MNPS schools on an equal basis (but it was first used for charter oversight). Student-based budgeting was adopted by the Office of Innovation and is now the basis for resource allocation throughout the district.

### Process vs. Professional Judgment

The Office has created a successful, well-vetted application process that is key to the quality of the portfolio—although it has been revised and streamlined due to the burden on other offices within MNPS. With respect to oversight decisions, there are processes on the books for probation, but the actual decision to refer something to the Board is actually discretionary, relying heavily on the Director's professional judgment as to whether a particular infraction merits a frank conversation or raising the issue to the level of Board attention.

# APPLICATION SYSTEMS AND PROCESSES

Many stakeholders, including those both inside and outside of the district, indicated that the rigor of the application process and ability of staff to identify quality applicants was the most significant contribution to the relatively high-performing charter sector in Nashville. Interviewees separately described MNPS's "high-quality bar," "front-end screen," and "holding applicants to a high bar" as key components in the growth of quality charter schools. In addition, stakeholders noted that the rigor of the application process allowed the MNPS Charter School Office to streamline and be efficient with charter oversight systems, and did not have to "suck a ton of resources in overseeing bad schools like a lot of other authorizers have to do." What follows are descriptions of the MNPS application systems and processes and how they operationalized those systems.

## Priorities for New Charter School

### Authorization

MNPS has, since 2009, been intentional about new charter school authorization, although that approach has evolved over time as described below.

**2009 to 2013:** The earliest strategic vision developed for Nashville charter schools in 2009-10 identified district preferences for charter schools based on an analysis of school options in proximity to struggling schools. The Director of Charter Schools would ask the Student Assignment Office to produce a report that identified the proximity of schools of choice to schools deemed unsatisfactory (e.g., on the federal "failing schools" list) for the purpose of locating new charter schools near schools that struggled the most. While there was no formal request for proposals that outlined district preferences, the Director would relay this information to prospective applicants in public forums and share the data with operators.

**2013 to 2015:** In November 2013, the MNPS Board passed a resolution establishing priorities for deploying charter schools beginning in 2014 (and a request for proposals was developed and issued beginning in 2014).

That resolution identified two priorities: (a) in areas where schools were underperforming<sup>5</sup> and (b) where schools were overcrowded.<sup>6</sup> The resolution further directed that MNPS shall "consider fiscal impact in recommending new charter schools for approval by the Board." Proximity to struggling schools and overcrowding continue to be two primary Board considerations in identifying priority areas for charter schools. Most applicants have expressed their desire to locate in the areas the Board has defined, and applicants are currently expected to address why they are proposing a school in a particular location. In the one instance when an applicant insisted on a location outside of the priority areas defined by the Board, the application was approved but caused conflict among Board members.

**2016 to Present:** The MNPS Office of Charter Schools' 2016 Charter School Application Guide available on the state Department of Education website (but unavailable on the district website) explicitly includes a request for proposals (RFP) and identifies district priorities. According to the guide, the RFP is shaped by an analysis of the academic performance of schools, rapid enrollment growth in schools that are overenrolled, and the diversity goals of the MNPS Diversity Management Plan. The guide expresses district preferences for new school proposals that offer to do one or more of the following:

Advance academic achievement for students currently enrolled in schools that underperform over multiple years on the Academic Performance Framework (APF)

- Reduce pressure on overcrowded schools
- Add to and do not diminish the number of schools with student enrollment diversity in Nashville
- Successfully convert management and transform school performance for a school whose three-year status is "Review" or "Target" (state designations of underperforming schools) on the APF
- Demonstrate a strong record of success in improving academic achievement in reading
- Demonstrate a strong record of success in improving academic achievement for English Learners

<sup>5</sup> "Charter school applications that propose conversions of traditional schools designated as in 'target' status as of fall 2014 based on the three-year composite measure on the MNPS Academic Performance Framework"

<sup>6</sup> "Applications for new charter schools locating in cluster tiers in which capacity is projected to exceed 120% as of fall 2017 based on the MNPS School Enrollment and Capacity report"



## Application Documents and Guidance for Applicants

MNPS provides guidance to prospective charter applicants through information available on the district website and informal discussions with applicants. The following application guidance documents were provided as of 2016:

**Charter School Review Policy Document.** The charter school review policy document describes the district's philosophy of authorizing, explicitly citing NACSA's Principles & Standards. It includes a description of the annual application review cycle with relevant dates. It describes the review process and timeline in general terms from Letter of Intent submission to Board decision making.

**Charter Applications and Rubrics.** MNPS uses the state's charter school application that describes application content and format requirements in detail. MNPS also provides operators intending to replicate a supplemental application that describes additional requirements. MNPS provides to applicants sample application ratings and criteria for both the standard charter application and the replication supplement. Both rubrics describe the characteristics of strong responses in each area of application evaluation and the overall requirements for approval. MNPS also provides electronic copies of charter school application recommendation reports previously submitted to the Board that include the scored application and summary ratings.

**Diversity Management Plan Submission Guidelines.** All charter applicants must submit a Diversity Plan in order to be considered for approval. MNPS provides an outline to aid applicants in the development of their Diversity Plan.

**Office of Charter Schools Annual Report.** The Office of Charter Schools publishes on its website an Annual Report on its charter school authorizing that reports on the academic performance of its schools, articulates its authorizing mission, describes the role of charter schools in the district, and identifies characteristics of strong schools in its portfolio.

## Application Process

The Office of Charter Schools has a multi-dimensional and multi-step process for approving charter schools.

What follows is a description of the key decision-making steps of that process.

**Application Cycle.** MNPS has one application review cycle that begins with a Letter of Intent due in the Office of Charter Schools no later than 60 days prior to April 1 of the year in which an applicant will apply. Applications must then be submitted to the Office of Charter Schools no later than April 1 of each year. The MNPS Board of Education makes approval decisions within 90 days of receipt of the application. If the Board does not approve the application, the applicant has 30 days from the date of receipt of grounds for denial to submit an amended application. The MNPS Board of Education then has 30 days after the receipt of the amended application to either deny or approve that application based on the recommendation of district review teams. The applicant may appeal a denial of the amended application to the state Board of Education within 10 days. The state Board has 60 days after the receipt of the notice of appeal to make a decision.

**Letter of Intent (LOI).** MNPS requires prospective applicants to submit a Letter of Intent to apply for a charter. The Letter of Intent must include basic information about the proposed school, including name, proposed model, and contact information for the application, as well as a description of the need for the proposed school with relevant demographic data. LOI requirements align with state guidelines. The Office uses the LOI to plan for upcoming application cycles but does not make any application approval decisions based on the information provided.

**Application Submission.** All applications are submitted to the Office of Charter Schools. The Office reviews each application to confirm that they include all of the requirements. If an applicant fails to include necessary components of the application, the application is evaluated "as is." There can be no additions or corrections during the initial review process.

**Application Types.** The charter application process differs by the type of application.

- **Application for a Public Charter School from New Operators:** MNPS requires applicants seeking to open a new charter school to describe their plans in three areas: academic, operations, and finances. Each area includes sub-areas with detailed guidance and requirements. The

provided rubric describes the characteristics of a strong response in each sub-area. The application explicitly states, “Academic program capacity and past performance are the most critical factor in evaluating applications and schools. However, operational performance and financial stability directly affect a school’s ability to help students succeed in the academic program. Thus, the application should manifest alignment across each section and address the best interests of the pupils, school district, or community.”

- **Replication Applicants:** MNPS requires operators applying to replicate to complete a Replication Application Supplement. Generally, operators outside of Tennessee (or operators in the state of Tennessee that propose significant modifications to their model) must complete the New Operator Application and the Replication Supplement. Existing Tennessee charter school operators are required to submit only the Replication Supplement. Applicants seeking replication are asked for different kinds of information in the application. In their Academic Plan, applicants seeking to replicate are required to describe any features of the new school’s academic plan that will differ from the operator’s existing schools. In the Operations Plan, applicants must describe the organization’s growth plan, capacity for growth, how the network will be managed, the governance structure and staffing at the network level, and information about any school management contract (if applicable). The replication application supplement rubric describes the characteristics of a strong response in each domain. MNPS also conducts its own due diligence on the performance and quality of the network/portfolio based on information provided by the applicant and other sources. A report on this due diligence is provided to reviewers for consideration as part of the evaluation process.
- **“Conversion” Charter Applications:** Conversion applicants do not apply for a charter to convert a specific district school. If approved, the operator works with MNPS to decide which existing low-performing school currently on the district’s priority list will be converted.

**Applicant Review Teams.** The Office of Charter Schools appoints teams of reviewers who independently review each charter application and render recommendations to the Office. From 2009 to 2014, review teams consisted of eight to 10 reviewers with each team handling up to three applications at a time. There were four lead reviewers. Reviewers were divided into teams with the lead reviewers, community members, charter school leaders, and members of various departments from within the district (e.g., Exceptional Education, English Learners Department, Federal Programs). Each team member read and scored every component of the application. Reviewers were not compensated for their time in reviewing applications.

From 2014 to the present, the MNPS Board wanted greater district-level accountability for recommendations, and the Office now uses four core reviewers from within the district to read every application, with non-district reviewers supplementing those reviews. Non-district reviewers (community members and satellite reviewers) provide feedback only on specific sections of the application. All satellite reviewers are trained on the application rubric.

**Interview.** The purpose of the interview is to provide applicants with an opportunity to address questions or concerns raised in the review of the written application and to evaluate the applicant’s capacity to implement the proposed program effectively. Anything that might not be clear in the application, specific weaknesses identified, and anything that requires more detail are addressed in the interview. It is possible that the team will request additional supplemental information or even an additional interview to clarify any outstanding concerns.

The Office strongly recommends that representatives of the proposed governing board, the school leader, and those individuals responsible for development of the application attend the application interview. The Office tries to limit the number of participants to three to five people from each side, but ultimately, the school decides who they want to attend. From 2009 to 2014, a team of five to six reviewers from across the district interviewed applicants. As noted previously, beginning in 2014, four core reviewers and the charter school director attend the interviews. The Director attends but does not actively participate in interviewing the applicant group.

MNPS does not have a specific interview protocol. Questions are developed by the four core review team members based on the review of the application. Interviewers decide on questions ahead of time, then rank them in order of importance. During the most recent application cycle, the office used the NACSA Interview Guide as a way to organize the questions and decide who should take the lead.

**Consensus Application Evaluation.** From the time that MNPS began authorizing charter schools, the process to send a recommendation to the MNPS Board of Education has been very structured. The Charter School Coordinator worked with the Tennessee Department of Education so that the district’s evaluation rubric was aligned with the state. Reviewers are trained on the application evaluation rubric and conduct their evaluation independent of Office input. Almost without exception, the Office’s roles have been to combine the rubric work completed by reviewers and summarize the team’s deliberations. The Office was “hands off” and “let the process work.”

Using information from the written application, feedback provided by external reviewers, and information gathered from the interview, core reviewers score and provide a rating for each section individually along with a rationale for each rating. Teams then meet to come to consensus on the ratings of each section and an overall recommendation to be sent to the Office of Charter Schools. Consensus is required on both the individual application domain ratings and the overall recommendation for approval/denial.

Stakeholders indicated that coming to consensus can be challenging but critical. Recommendations are not reached by giving points to each section and creating a composite score. Instead, schools are recommended for approval if they receive consensus ratings of “Meets or Exceeds” in every application section. If the applicant fails to receive “Meets or Exceeds” in every section, the application is recommended for denial. In some cases, applicants are interviewed a second time to resolve disputes on the team. There is evidence that the review teams evaluate applications on their merit and do not consider external factors in their decision making: in one application review, both the application reviewers and the Interim Director expected the Board to deny a strong application for a controversial charter conversion. Reviewers evaluated the application on its merits, independent of expected Board votes, and recommended

the application for approval (the application was subsequently denied by the Board).

The evaluation team submits their final recommendation to approve or deny the application to the Office of Charter Schools. The Office reviews the objective reasons with the team and readies the recommendation report for the MNPS Board of Education. The review team reviews the Office’s work and signs off. Recommendations to the Board include a summary analysis that includes an explicit recommendation to approve or deny the application, along with a rationale for the decision, and section summaries with ratings and rationales for those ratings.

**Submitting the Recommendation.** Before submitting the recommendation and supporting documentation to the Board, the Office of Charter Schools shares the recommendation with the Director of Schools (Superintendent) and district media personnel. The level of involvement of the Director of Schools in engaging the application decision has varied—from closely examining and raising questions about the application to non-involvement—but the recommendations made by the Office and review team have not been altered prior to going to the Board. The Director of Charter Schools submits the written recommendation report and supporting documentation to the Board. Each application, whether the recommendation is to approve or deny, is presented to the Board. There are Board member liaisons who keep tabs on the process to varying degrees, but there is no formalized Board supervision of, or deep engagement with, the application process.

**Board Decision Making.** During a public Board meeting, the Director of Charter Schools presents recommendations to the Board, the Board deliberates, and then votes. If the Office recommends denying a charter application, there is typically very little discussion of the recommendation and the Board votes to support the Office’s recommendation. Discussion on a recommendation for approval is more robust. Stakeholders noted that discussion of those applications has varied over the years from a conversation about the merits of the application to “politically motivated” overall opposition to any charter school. At the time of the site visit in June 2016, the Board had agreed with all but three recommendations presented by the Office of Charter Schools. While state law allows a local school board to deny an application for “substantial negative fiscal

impact”—and the Office provides the Board with a fiscal impact analysis with every charter recommendation—no application has ever been denied for fiscal impact.

**Amendment and Appeal Process.** As noted in a prior section, denied applicants have a statutory right to revise and resubmit their application. Revisions may be made only to those areas of the application that the review teams have identified as deficient. A complete rewrite of the application is not accepted. If an amended application is received, the same review team that read and made a recommendation on the initial application evaluates the amended application to determine if the deficiencies have been corrected and to make a recommendation to the MNPS Board of Education to either approve or deny the amended application. Stakeholders described the amendment process as “awkward” but also indicated that it has provided an opportunity for applicants who need a few adjustments to revise and resubmit an application and not have to wait for the next application cycle the following year.

When the district first began authorizing charter schools, the Board almost always rejected applications on the first round and sought improvements in the applications during the amendment phase. Once applicants improved at writing applications and describing their plans (and the state application improved), the Board began to approve more schools on the first round. Of the 47 applications initially denied between fall 2009 and fall 2015, 23 petitioners submitted an amended application and six were approved.

A denial of an amended application for a new (non-conversion) charter by the MNPS Board may be appealed by the applicant to the State Board of Education. From fall 2009 to fall 2015, 10 applications have been appealed to the State Board of Education. Two were remanded back to MNPS to reconsider (one of those was conditionally approved and the other denied a third time), two were approved and were chartered directly by the State Board of Education, and the State Board denied six appeals. Stakeholders indicated that the law allowing for a denied application to be chartered directly by the State Board has not impacted how the Office conducts its application process.

## Equity and Student Diversity in the Application Process

MNPS has a formal requirement for charter school applicants to align school-level diversity plans with the district’s Diversity Management Plan. Equity issues are also specifically addressed in the written charter application.

**Diversity Management Plan.** In November 2012, the Board adopted a resolution which called for all students to be “provided the benefits of learning in diverse settings” and which declared that “quality, diverse schools at all grade levels are indispensable to the civic and educational purpose” of the school district. The district views racial/ethnic isolation as an educational disadvantage since it does not effectively prepare students to contribute as adults to a diverse society. The districtwide diversity plan sets school-level student diversity targets for race/ethnicity, income, language, and disability, as well as staff diversity targets for race/ethnicity. MNPS assesses and reports on schoolwide student performance in conjunction with its assessment of each school’s diversity.

Charter schools that operate or apply to operate within the jurisdiction of MNPS are required to comply with the plan. Charter school applicants submit a Diversity Plan as part of the application process. Applicants are required to articulate the school’s race-neutral approach to advance diversity and describe how school location, student recruitment, transportation plans, grade configurations and feeder patterns, and specialized programs will advance diversity in the school. Specialized programs include English Learners (EL), differentiated instruction, special education, cultural competency, and family engagement.

### **EQUITY AND DIVERSITY REQUIREMENTS IN THE CHARTER APPLICATION**

- **Special Populations and “At-Risk” Students:** In addition to a Diversity Plan, applicants are required to provide a detailed, comprehensive plan on how the school will serve students with special needs, including but not limited to those students with federally recognized disabilities; students with Section 504 Plans; English Learners; students identified as intellectually gifted; and students at risk of dropping out.

- **Student Discipline:** Applicants are also required to provide the student discipline policy for their school. This policy must include the specific practices the school will use to promote good discipline, including both penalties for infractions and incentives for positive behavior; a list and definitions of the offenses for which students in the school must and may be suspended or expelled; the procedures for due process; an explanation of how the school will protect the rights of students with disabilities; and a description of individuals responsible for carrying out the discipline policies.
- **Marketing, Recruitment, and Enrollment:** Applicants are required to describe how students will be given an equal opportunity to attend the school. Specifically, applicants must describe any plans for outreach to families in poverty, academically low-achieving students, students with disabilities, English Learners, and other students at risk of academic failure.

# PERFORMANCE MANAGEMENT

## Pre-opening Systems and Practices

MNPS developed the Pre-Opening Charter Accountability Workbook in 2010 to formalize requirements and to assist leaders and board members of new charter schools to prepare for the opening of school. MNPS adapted the Workbook from a variety of sources, and most directly credits the Charter School Institute of the State University of New York (SUNY). The Workbook describes the specific “Pre-Opening Actions” the school is required to take, as well as the process by which the MNPS Office of Charter Schools visits the school and conducts further follow-up to ensure that all Pre-Opening Actions have been taken.

The Workbook is structured as a comprehensive checklist outlining the necessary procedures that must be followed, policies that must be adopted, and documentation to be turned in within the first year of a new charter school’s operation. Per the terms of the Charter Agreement, no school may commence instruction until and unless the Office of Charter Schools issues a letter to the school (“Pre-Opening Action Letter”) that confirms satisfactory completion of Pre-Opening Actions.

The MNPS Charter School Office focuses on helping schools to open successfully and reports to be in close communication with school leadership during the pre-opening year. There is no formal schedule, but every school has at least one individual meeting to discuss the process and answer questions, followed by other meetings at the school or at the MNPS Office, as deemed necessary. For some schools, especially first time approvals, MNPS establishes monthly meetings to ensure plans are on track. The Charter Office conducts a “Pre-Opening Action Visit” during the late spring or early summer in order to verify school completion of items on the checklist and to remediate any identified problems. The Charter Office provides some leeway to schools to complete the action list during the first year of operation but requires completion of all items prior to August 1 following the first year of school operation in order to avoid recommendation for immediate revocation. MNPS reserves the right to delay the anticipated date of opening as deemed necessary to protect student health or safety and to ensure a sound education.

**Important Attributes of MNPS Pre-Opening Systems and Practices.** While the Workbook and Charter

Agreement formalize the requirements and procedures for school opening, MNPS Charter Office staff identified several factors that have contributed to successful school openings:

- **Organizational Readiness.** The rigorous application approval process identifies teams and organizations that demonstrate awareness and capability to complete the many tasks necessary for new school opening.
- **Third-Party Technical Assistance.** The Tennessee Charter School Center has provided valuable resources and technical assistance to new MNPS charter schools during the pre-opening year. Specific services include:
  - » Facility identification, acquisition, and renovation
  - » Board recruiting and development
  - » Funding for personnel prior to school opening
- **Start-Up Planning Time.** New charter schools have typically received charter application approval in late summer (August) with a full year to plan for school opening. This amount of time is deemed essential to support successful start-up.
- **Start-Up Funding for New Schools.** In the five-year period between 2011 and 2015, new charter schools and charter management organizations (CMOs) in Tennessee (including Nashville) had access to an expanded pool of start-up funding. In addition to state-administered federal funding through the Charter Schools Program (CSP) grant, many new Nashville charter schools received financial support through the \$30 million Tennessee Charter School Growth Fund, a private-public fund that included federal Race to the Top funds, and philanthropy from local and national funders. Fifteen Nashville charter schools that opened during this time period were part of a CMO that received scale-up grants from the CSGF Tennessee Fund, and five other new, non-networked Nashville charter schools received support from the Tennessee Charter School

Incubator (also funded by the Charter School Growth Fund). CMOs typically received between \$2-\$5 million to provide staff and resources to successfully open new schools. (See *Growing a High-Quality Charter Sector*<sup>7</sup> for more details about the Fund and impact on the Tennessee charter sector.)

## Performance Framework

MNPS worked with the National Association of Charter Schools (NACSA) to develop a Performance Framework that sets the academic, organizational, and fiscal standards by which MNPS evaluates charter school performance and sustainability. Charter agreements clearly identify the Performance Framework as the basis for renewal and revocation decisions, and supersede all performance measures included in the charter school application.

The current version of the Academic Performance Framework (APF) was adopted in 2013 and is used consistently to evaluate the quality of all charter and district-managed MNPS schools. The APF is organized around four indicators: Academic Progress (50 percent), Attainment and College Readiness (30 percent), Achievement Gap (5 percent), and School Culture (15 percent). Indicators include multiple measures, and each measure is weighted to provide an overall cumulative rating for the school. Measures are differentiated for schools serving high school vs. K-8 students, but the weighting for each of the four indicators are consistent for all types of schools (see percentages above). For each measure, a school receives one of five ratings (Excelling, Achieving, Satisfactory, Review, Target) that are based on the school's performance relative to other schools in the district that serve similar student grade levels. MNPS uses the same rating categories to provide an overall rating for the school from all measures of the APF. Every school receives an annual score, as well as a cumulative three-year average score.

MNPS uses its Financial Performance Framework as a red-flag indicator to identify concerns related to financial viability and sustainability. The indicators and measures are directly aligned with NACSA's model Performance

Framework and are based on data from the annual independent audit that schools must submit on or before December 31.

The indicators and measures in the Operational Performance Framework are also closely aligned with NACSA's model Performance Framework. The MNPS Charter Office completes the Operational Framework as part of its annual site visit process and has developed an Operational Performance Rubric to clarify criteria for "meeting standards" on each of the organizational indicators. Schools that fail to meet standards on either the Operational or Financial Framework may receive "Notices of Concern" or "deficiency" as outlined in the Procedures for Sub-Standard Performance of a Charter School (see below).

**Important Attributes of the MNPS Performance Framework.** MNPS views its Performance Framework as a critical tool for tracking and reporting on the success of its charter school portfolio. MNPS leaders identified the following factors as contributing to an effective performance framework:

- **Districtwide Performance Framework.** By applying the Academic Performance Framework to all schools (district and charter), MNPS has established an evaluation system that is broadly viewed as a fair and credible measure of school quality.
- **Focus on Performance Framework for Accountability Decisions.** By exclusively focusing on the Performance Framework as the basis for renewal and revocation decisions, MNPS is able to communicate and evaluate charter schools against a consistent set of performance expectations rather than a tailored set of performance goals established in charter applications.
- **Multi-year Measures:** Since many of the academic performance measures can vary significantly from year to year, MNPS uses multi-year measures in critical decisions (e.g., renewal and revocation) to smooth out annual variance in performance levels.
- **Accessibility of Top Performance Ratings.** MNPS has constructed the APF so that the top performance category ("Excelling") is within reach

<sup>7</sup> <http://publicimpact.com/growing-a-high-quality-charter-sector-lessons-from-tennessee/>

of any school, regardless of socio-economic factors. For example, in the 2015 APF results for K-8 schools, schools in the top “Excelling” category serve student populations that range from 11 percent economically disadvantaged (ED) to 91 percent ED, with a healthy mixture of schools at all levels.

## Performance Accountability

Tennessee Charter School Law requires district authorizers to grant 10-year charter agreements for schools and to conduct a five-year interim review during the charter term. Tennessee law provides that a charter agreement may be revoked or denied renewal if the chartering authority determines that the charter school committed a material violation of any of the standards, conditions, or procedures set forth in law or failed to meet generally accepted standards of fiscal management. Tennessee law also requires authorizers to revoke or deny renewal if the school is identified as a “priority school,” performing in the lowest 5 percent on the state accountability system, unless the school was authorized by the Achievement School District or is a conversion charter school and has not been identified as a priority school for two consecutive cycles.

During the 2015-16 school year, MNPS implemented a 10-year renewal process for the first time. The current renewal process guidelines are described in the MNPS Charter Renewal Policy, but since only one school has gone through the process to date, the primary focus for performance accountability has been the MNPS annual review process. Key elements of the MNPS performance accountability process are described below.

**Annual Report Card.** MNPS publishes an Annual Report Card for all charter schools in October that includes up to five years of Performance Framework data. The Annual Report also includes a statement about renewal, with three possible outcomes: Full Renewal, Conditional Renewal, and Non-Renewal. Renewal status is based primarily on performance on the Academic Performance Framework, although MNPS renewal and revocation actions can also be triggered by notices of concern and deficiencies associated with indicators and measures on the Financial and Operational Frameworks. The MNPS provides schools with notice of operational and financial deficiencies well in advance of each Annual Report, and if

issues are resolved in advance of the Annual Report Card being distributed, MNPS adjusts the Annual Report Card findings to reflect improvements.

**Annual Site Visit.** Consistent with the MNPS Renewal Policy and the Operational Framework, the Office of Charter Schools conducts formal evaluation visits multiple times during each school's initial charter year and at least once per year in each of the subsequent years until the charter contract comes up for renewal after 10 years. Site visit reports focus on school performance on the Operational Framework and provide feedback to assist schools in meeting performance expectations. MNPS views the reports as an important mechanism for keeping boards, staff, parents, and community members informed about school performance. The Charter School Evaluation Visit Guide for School Leaders provides a detailed description of the site visit process, including details regarding pre-visit preparation, site visit logistics, document review, and content for the site visit report.

**Procedures for Sub-Standard Performance.** MNPS has published its Procedures for Sub-Standard Performance of a Charter School to articulate its procedures for taking action when a charter school is not meeting standards, up to and including a closure recommendation. The Procedures document describes tiered actions (“notices”) for communicating performance deficiencies, including “notice of concern,” “notice of deficiency,” “notice of probation,” “charter review,” and “charter revocation.” The document describes “triggers” and “actions/consequences” for each level. The levels generally correspond to the magnitude of the performance deficiency and the school’s failure to correct reported deficiencies over time. The MNPS Charter School Office staff indicate that notices are used judiciously in order to preserve their influence to spur corrective action by charter schools.

**Charter School Renewal Policy.** MNPS has published its Charter School Renewal Policy and Benchmarks to describe its process for reviewing charter applications for 10-year renewals. The renewal process requires schools to submit a renewal application by April 1 of the year prior to the year in which the charter expires. The renewal policy provides for a tiered renewal application process that requires differentiated levels of documents predicated on the charter school’s performance over the previous contract period. By February 1 of the following year, MNPS



must issue a written renewal decision. Charter school boards may appeal a non-renewal decision to the State Board of Education within 10 business days. If the State Board of Education upholds the denial, that decision is final and there is no appeal. As noted above, MNPS has implemented only one 10-year renewal process since it began authorizing schools in 2005, so the renewal process has not been a prominent component of its authorizing practices. MNPS is scheduled to implement three more renewals over the next four years, but starting in 2020, MNPS will begin to see a steady volume of renewal applications (approximately four to five per year.)

**Charter School Closure Policy.** There are three ways a charter school can be closed: the charter school board can voluntarily surrender its charter, MNPS can choose not to renew a charter, or MNPS can revoke the charter. MNPS has closed four schools through revocation during its first 10-year period of charter authorization. Although performance on the annual school report card is the primary mechanism for identifying schools that may be subject to non-renewal or revocation, MNPS has not published specific decision criteria for recommending school closure to the MNPS Board of Education. Tennessee charter law and MNPS charter authorization policies do include automatic closure expectations for a charter school in the bottom 5 percent of the state's academic accountability system and labeled as a priority school.

The MNPS *Charter School Closure Procedures Manual* documents the process for initiating school closures and is focused on three goals:

1. Providing educational services in accordance with the charter contract until the end of the school year or the agreed-upon date when instruction will cease
2. Reassigning students to schools that meet their educational needs
3. Addressing the school's financial, legal, and reporting obligations

The document outlines the framework and timeline for managing the school closure process, including a School Closure Action Plan that serves as a checklist that details key actions, responsible parties, and targeted completion dates.

## MNPS Approach to Charter

### School Intervention

The MNPS Office of Charter Schools seeks to be collaborative in its approach to supporting school success. Its primary mechanism for providing support is to provide a consistent and fair approach to proactively communicate notices of concern and deficiencies that can lead to eventual revocation or non-renewal and by publishing school annual reports that provide a clear view of school performance measures that will inform school closure decisions. Although multiple offices within MNPS provide operating services and supports for charter schools, MNPS does not recommend nor provide intervention services to address academic and operational deficiencies.

While it is the policy of the Charter School Office to be collaborative with the charter schools and to encourage their success, charter schools exist to achieve meaningful results for their students as demonstrated by a sound body of evidence. Charter schools that cannot deliver results showing significant student achievement gains must be closed. The Charter Schools Office has a responsibility to the students, parents, stakeholders, and the broader public to ensure that a school that is not performing is closed and those students affected are transferred to schools where they can be successful.

### Important Attributes of the MNPS Performance Accountability System

In summary, the distinguishing characteristics of the MNPS performance accountability system include the following elements that are most influential on the quality of MNPS charter schools:

- **Focus on annual evaluation and report.** MNPS relies on the school Annual Report Cards to clearly communicate whether charter schools are meeting performance expectations and to signal whether a school is at risk for non-renewal or revocation.
- **Tiered response for performance feedback.** The MNPS process for communicating notices of concern/deficiencies provides a clear mechanism to spur actions and consequences related to school performance deficiencies.

- **Limited impact of renewal process (so far).** Unlike many charter authorizers, the MNPS charter renewal process has not yet played a key role in ensuring quality of the charter portfolio. The renewal process is documented but has not yet been fully built out to accommodate a higher volume of annual renewals that will begin in the 2020-21 school year.
- **Low intervention authorizer.** MNPS takes a hands-off approach to providing intervention supports and recommendations to schools. MNPS instead focuses on communicating school performance and the need to make corrections to operational and academic deficiencies.
- **Early school closure experience built public confidence.** Charter Office staff noted that the decision and closure procedures that took place in the early years of charter authorization was an important step for building confidence in the accountability system with the public and the MNPS Board of Education. The relatively quick and smooth closure of a school in 2010 communicated MNPS's commitment to school quality and its capacity to close schools without significant disruption to students, families, and communities.

## Replication and Growth

MNPS created its *Policy Framework for Charter School Replication* in September 2012 in order to differentiate and improve its process for reviewing and approving new school applications submitted by a school management organization that operates multiple schools in Nashville or in other communities within or outside of Tennessee. Policies related to approval of replication applications are further described in Application Systems & Processes section of this case study, but are primarily focused on a differentiated application that allows MNPS to better understand the applicant's capacity to successfully replicate a proven school model rather an active approach by MNPS to encourage replication applications. MNPS has also established specific policies related to the oversight and evaluation of replication schools:

Each school within a charter management organization (CMO) will be assessed on its own student achievement data, not based on an aggregation of data across multiple schools in the organization. Each individual school will

continue to face high-stakes closure decisions in alignment with MNPS Renewal and Closure Practices.

CMOs are not allowed to avoid closure proceedings by merger (restart) with a higher-performing CMO, unless approved by the MNPS Board of Education.

## Equity Policies

The MNPS Board of Education approved a resolution in 2012 that identifies “racial/ethnic isolation as an educational disadvantage since it does not effectively prepare students to contribute as adults to a diverse society and is, indeed, an especially inappropriate setting for education in this richly diverse school system.” In order to operationalize this policy, MNPS adopted a Diversity Management Plan that defines diversity related to race/ethnicity, family income, language, and learning disabilities. The plan sets metrics for achieving student diversity related to these demographic characteristics and communicates a commitment toward “progress across time” in achieving diversity metrics.

The MNPS Charter Office uses three mechanisms to support the achievement of diversity goals for Nashville charter schools:

**Charter Application Questions.** As part of the charter application process, the application review panel requires applicants to submit responses to Diversity Plan Questions that are incorporated into the evaluation process.

**Equity Measures on School Report Cards.** The annual charter school Report Card includes diversity measures related to race/ethnicity, as well as measures of income, language, and student disability. Charter Office staff report that the primary goal is to see improvement over time with these measures.

**Ongoing Monitoring and Oversight.** Although not yet formalized in MNPS policies and procedures, the Charter School Office reports that it monitors for irregularities in student enrollment patterns that might signal deficient practices for ensuring fair and equitable access to all students. This data is shared during quarterly meetings with leaders of MNPS charter schools as a means to raise awareness of outlier schools and practices that are counter to MNPS school diversity goals.