



## **Titus 2 Academy: Application for SBE Approval as a Category IV Non-Public School**

Pursuant to Tennessee Code Annotated (“T.C.A.”) § 49-50-801 and State Board Rule 0520-07-02-.05, church-related schools “operated by denominational, parochial, or other bona fide [religious] organizations” may apply directly to the State Board of Education (“State Board”) for approval if they are not accredited by or members of one of the accrediting or membership agencies set forth in T.C.A. § 49-50-801(a). Schools seeking approval directly from the State Board must complete and submit an application to the State Board’s Executive Director and meet any deadlines established by State Board staff. In accordance with State Board Rule 0520-07-02-.05, State Board staff shall review any complete and timely submitted application and provide a recommendation for approval or denial of the application to the State Board.

### **Background**

Titus 2 Academy proposes to open a K-12 church-related umbrella school program whereby parents provide instruction to their own children in their home, in accordance with T.C.A. §§ 49-6-3050, 49-50-801, and State Board of Education Rule 0520-07-02-.05.

The application was submitted by members of [The Homeschool Counseling Team](#), a group of individuals who provide support to homeschooling families throughout Tennessee. The team’s goal is to help families with record-keeping services such as transcripts and diplomas and to provide such services at the best possible price. The applicant explained that having to pay separately for an umbrella program, homeschool counseling, and record-keeping is not cost-effective for families, and the school aims to solve that problem.

The school will be operated by the Words of Wisdom Family Ministry, a Christian 501(c)(3) non-profit ministry corporation owned and operated by The Homeschool Counseling Team. The school will not employ teachers or offer a physical location (i.e., room or building) to be used by students and/or school staff for schooling or school-related functions.

### **Review Process**

Members of the SBE legal team evaluated the application using SBE’s scoring rubric for Category IV schools. The reviewers notified the applicant of any initial deficiencies and provided an opportunity to correct and resubmit the application materials. The Executive Director reviewed the findings and met with the reviewers to discuss the application in order to determine her recommendation to the board.

### Summary of Reviewer Findings

Once the applicant corrected the SBE-identified deficiencies in their application materials, the reviewers determined that Titus 2 Academy's application was complete and met the requirements for SBE approval. Specifically, the applicant submitted:

- A timely application utilizing the current SBE application.
- A cover letter with its rationale for application.
- The denominational, parochial, or other bona fide religious organization's IRS 501(c)(3) status letter.
- A document outlining the religious beliefs of the denominational, parochial, or other bona fide religious organization.
- A family handbook containing policies/procedures to:
  1. Comply with the requirement of T.C.A. § 49-6-3007 that the names, ages, and addresses of all pupils in attendance be reported to the director of schools of the public school district in which the student resides.
  2. Ensure students entering Kindergarten have reached five (5) years of age on or before August 15.
  3. Maintain an operating schedule that includes at least 180 instructional days of at least 6 ½ hours.
  4. Comply with T.C.A. § 49-6-3007(d) by keeping daily reports of attendance, verified by the teacher making the record, which shall be open to inspection by the director of schools of the district in which the school is located.
  5. Comply with T.C.A. § 49-6-3007(e)(1) by providing written notice to the parent, guardian, or person having control of a student subject to compulsory attendance that the parent, guardian, or other person having control of the student must monitor the student's school attendance and require the student to attend school.
  6. Comply with T.C.A § 49-6-3009(k) by adopting a policy addressing compulsory attendance and truancy that describes the interventions that the school will employ for violations of compulsory attendance laws.

Titus 2 Academy will not maintain a physical location of any kind for tutoring, support services, meetings, office staff, etc. Therefore, reviewers determined that the following requirements do not apply:

1. Construct, remodel, renovate, expand, or model school buildings or other structures in accordance with any state and/or federal requirements applicable to the school regarding building accessibility,

which may include, but is not limited to, the Americans with Disabilities Act and Section 504 of the Rehabilitation Act of 1973.

2. Comply with all fire safety regulations and procedures promulgated by the Tennessee Fire Marshal's Office.
3. Conduct at least one (1) fire safety inspection annually based on the fire safety inspection checklist developed by the Tennessee Fire Marshal's Office, and maintain copies of the inspection reports, including findings of non-compliance and actions taken to comply, for review by the Tennessee Fire Marshal's Office.
4. Comply with all rules and regulations and codes of the city, county, and state regarding planning of new buildings, alterations, and safety.

Similarly, pursuant to SBE Rule 0520-07-02-.05(3)(e), Titus 2 Academy is not required to obtain proof of vaccinations from students because it is an umbrella home school, taught at home by a parent-teacher in accordance with T.C.A. § 49-6-3050. Likewise, the school is not required to conduct a criminal history records check for their parent-teachers who are instructing their own children (*see* Rule 0520-07-02-.05(2)(a)).

Finally, because Titus 2 Academy does not maintain a physical location, documentation of the following inspections was not required:

1. Department of Health Foodservice Environment Inspection
2. Department of Commerce and Insurance Fire/Electrical Inspection.

#### **Reviewer and Executive Director Recommendation**

Because Titus 2 Academy meets the applicable requirements for Category IV church-related schools, the reviewers recommend that the application be approved. The Executive Director concurs with the recommendation.