
BEFORE THE TENNESSEE STATE BOARD OF EDUCATION

IN RE:) State Board of Education Meeting
"THE" ACADEMY ALL GIRLS CHARTER SCHOOL) October 20, 2017
Charter School Appeal)
)

**FINDINGS AND RECOMMENDATION REPORT
OF THE EXECUTIVE DIRECTOR**

Pursuant to Tennessee Code Annotated (T.C.A.) § 49-13-108, sponsors proposing to open new charter schools may appeal the denial of their amended application by a local board of education to the State Board of Education ("State Board"). On September 2, 2017, "THE" Academy All Girls Charter School appealed the denial of its amended application by Shelby County Schools ("SCS") Board of Education to the State Board.

Based on the following procedural history, findings of fact, and Review Committee Report attached hereto, I believe that the decision to deny the "THE" Academy All Girls Charter School's amended application was not "contrary to the best interests of the pupils, school district, or community."¹ Therefore, I recommend that the State Board affirm the decision of SCS to deny the amended application for "THE" Academy All Girls Charter School.

STANDARD OF REVIEW

Pursuant to T.C.A. § 49-13-108 and State Board policy 2.500, State Board staff and an independent charter application review committee ("Review Committee") conducted a de novo, on the record review of the "THE" Academy All Girls Charter School's amended application. In accordance with the Tennessee Department of Education's charter application scoring rubric, "applications that do not meet or exceed the standard in all sections (academic plan, operations plan, financial plan, and, if applicable, past performance) . . . will be deemed not ready for approval."² In addition, the State Board is required to hold a public hearing in the district where the proposed charter school seeks to locate.³

In order to overturn the decision of the local board of education, the State Board must find that the local board's decision to deny the charter application was contrary to the best interests of the pupils,

¹ T.C.A. § 49-13-108.

² Tennessee Charter School Application Evaluation – Ratings and Sample Scoring Criteria, pg. 1.

³ T.C.A. § 49-13-108.

school district, or community.⁴ Because “THE” Academy All Girls Charter School is proposing to locate in a school district that contains a school on the current or last preceding priority school list, the State Board has the ability to approve the application, and thereby authorize the school, or to affirm the local board’s decision to deny.

PROCEDURAL HISTORY

1. On February 1, 2017, the Sponsor submitted a letter of intent to SCS expressing its intention to file a charter school application for “THE” Academy All Girls Charter School.
2. The Sponsor submitted its initial application for “THE” Academy All Girls Charter School to SCS on April 3, 2017.
3. SCS assembled a review committee to review and score the “THE” Academy All Girls Charter School application. The review committee recommended denial of the “THE” Academy All Girls Charter School initial application.
4. On May 11, 2017, a SCS panel, which included external expert reviewers, held a capacity interview with “THE” Academy All Girls Charter School.
5. On June 26, 2017, the SCS Board of Education voted to deny the “THE” Academy All Girls Charter School initial application based upon the review committee’s recommendation.
6. The Sponsor amended and resubmitted its application for “THE” Academy All Girls Charter School to SCS on July 28, 2017.
7. SCS’s review committee reviewed and scored the “THE” Academy All Girls Charter School’s amended application and again recommended denial.
8. On August 23, 2017, based on the review committee’s recommendation, SCS voted to deny the “THE” Academy All Girls Charter School’s amended application.
9. The Sponsor appealed the denial of the “THE” Academy All Girls Charter School amended application in writing to the State Board on September 2, 2016, including submission of all required documents per State Board policy 2.500.
10. At the time of appeal to the State Board, the Sponsor did not submit any corrections to the application as allowed under T.C.A. § 49-13-108(a)(4)(C).
11. The State Board’s Review Committee analyzed and scored the “THE” Academy All Girls Charter School amended application using the Tennessee Department of Education’s charter application scoring rubric.

⁴ T.C.A. § 49-13-108.

12. On September 21, 2017, the State Board Executive Director and staff held a public hearing in Memphis. At the public hearing, the Executive Director heard presentations from the Sponsor and SCS and took public comment regarding the "THE" Academy All Girls Charter School application.
13. The State Board's Review Committee conducted a capacity interview with the proposed governing board of "THE" Academy All Girls Charter School and key members of the leadership team on October 3, 2017, in Nashville.
14. After the capacity interview, the Review Committee determined a final consensus rating of the "THE" Academy All Girls Charter School amended application, which served as the basis for the Review Committee Recommendation Report.

FINDINGS OF FACT

- **District Denial of Application.**

The review committee assembled by SCS to review and score the "THE" Academy All Girls Charter School initial and amended applications consisted of the following individuals:

Name	Title
LaTricea Adams	Manager, Organizational Quality Shelby County Schools
Trudy Brewer	Advisor, Exceptional Children & Health Services Shelby County Schools
Summer Jennings	HR Specialist, Instructional Shelby County Schools
Brant Reidel	Director of Assessment and Accountability Shelby County Schools
Gercia Robertson	Senior Accountant Shelby County Schools
Meredith Smith	Director of Operations Aurora Collegiate Academy
Morticia Taylor	Instructional Advisor, Mathematics Shelby County Schools
Bill White	Director, Planning & Accountability Shelby County Schools
Beth Seling	Independent Contractor
Erin Winn	Advisor for Academic Accountability and Quality - Charter School Office Shelby County Schools

The "THE" Academy All Girls Charter School initial application received the following ratings from the SCS review committee:

Sections	Rating
Academic Plan Design and Capacity	Does Not Meet Standard
Operations Plan and Capacity	Partially Meets Standard
Financial Plan and Capacity	Does Not Meet Standard

After the SCS review committee completed its review and scoring of the initial application, its recommendation was presented to the SCS Board of Education on June 28, 2017. Based on the review committee's recommendation, the SCS Board of Education voted to deny the initial application of "THE" Academy All Girls Charter School.

Upon resubmission, the amended application received the following ratings from the SCS review committee:⁵

Sections	Rating
Academic Plan Design and Capacity	Partially Meets Standard
Operations Plan and Capacity	Partially Meets Standard
Financial Plan and Capacity	Does Not Meet Standard

After the SCS review committee completed its review and scoring of the amended application, its recommendation was presented to the SCS Board of Education on August 22, 2017. Based on the review committee's recommendation, the SCS Board of Education voted to deny the amended application of "THE" Academy All Girls Charter School.

- **State Board Charter Application Review Committee's Evaluation of the Application**

Following the denial of the "THE" Academy All Girls Charter School amended application and their subsequent appeal to the State Board, State Board staff assembled a diverse Review Committee of experts to evaluate and score the "THE" Academy All Girls Charter School amended application. This Review Committee consisted of the following individuals:

Name	Title
Leigh Cummins	Former Policy and Research Analyst State Board of Education
Grant Monda	School Leader Aurora Collegiate Academy
Addison Old	Master of Public Policy in Education Policy Student Vanderbilt University
Leslie Pack	Managing Director - Healthcare Sponsor Finance Team First Tennessee Bank
Tess Stovall	Director of Charter Schools State Board of Education
Jay Whalen	Deputy Director of Charter Schools State Board of Education

⁵ Please see EXHIBIT B for a copy of the SCS review committee report.

The Review Committee conducted an initial review and scoring of the “THE” Academy All Girls Charter School amended application, a capacity interview with the Sponsor, and a final evaluation and scoring of the amended application resulting in a consensus rating for each major section. The Review Committee’s consensus rating of the “THE” Academy All Girls Charter School amended application was as follows:

Sections	Rating
Academic Plan Design and Capacity	Does Not Meet Standard
Operations Plan and Capacity	Does Not Meet Standard
Financial Plan and Capacity	Does Not Meet Standard

The Review Committee recommended that the application for “THE” Academy All Girls Charter School be denied because the applicant failed to provide sufficient evidence that it met the required criterion in the academic, operational, and financial sections of the rubric. Specifically, the academic plan did not present sufficient information regarding how the school would identify, support, and instruct special populations, use interventions, and implement Response to Instruction and Intervention (RTI²). The applicant addressed their plan to use NWEA MAP assessments for student benchmarking and easyCBM for interventions; however, there was not enough information regarding how assessment will be administered at the school or classroom level and used to inform instruction. The application stated that the school would prepare students to become learners in a global society and have a focus on the arts; however, the proposed curricula, courses, and schedule did not include these areas. Finally, the marketing and enrollment plan did not adequately address the Sponsor’s contingency plan in the event they are not able to meet their projected enrollment.

Moreover, the operations plan and capacity evinced concerns regarding the governing board and proposed school leadership, an adequate facility, staffing, professional development, and contingency planning. The application identified a school leader and founding board members; however, the Sponsor has indicated that the school leader and founding board members may not remain with the school post approval, and the Sponsor did not have a clear plan for recruiting and choosing additional board members. The Sponsor intends to use the proposed school facility rent-free, for an indefinite period; however, there was no letter of commitment or memorandum of understanding from the building owner noting this, and it remains unclear if the Sponsor would prefer for “THE” Academy to remain housed at this site or eventually relocate to another facility. The application was also inconsistent in regard to the positions described in the application narrative, staffing chart(s), budget and budget narrative, and the capacity interview, and the Sponsor did not show that it has an appropriate plan for professional development.

Finally, the financial plan and capacity section of the application indicated a lack of documented commitment of funds, no guaranteed startup funds, inadequate contingency plan, no line of credit, and insufficient details surrounding the budget. The Sponsor proposes to raise \$300,000 in Year 0 via fundraising to start up “THE” Academy All Girls Charter School and to continue using fundraising to continue supporting its operation. However, the school has no documented commitment of funds from any donors, and there was no contingency plan to address a lack of donors. In addition, there were items

contained in the budget narrative and/or earlier in the application which were not included in the budget and the budget contained vague line items.

In summary, the Review Committee determined that "THE" Academy All Girls Charter School did not provide sufficient evidence in the academic, operational, and financial sections of their application to meet the required rubric ratings for approval. The capacity interview with the Sponsor did not provide further clarification that would have resulted in a higher rating. Therefore, the Review Committee recommended that the "THE" Academy All Girls Charter School application be denied.

For additional information regarding the Review Committee's evaluation of the application, please see **EXHIBIT A** for the complete Review Committee Report, which is fully incorporated herein by reference.

- **Public Hearing**

Pursuant to statute⁶ and State Board policy 2.500, a public hearing chaired by the Executive Director of the State Board was held in Memphis on September 21, 2017. SCS's presentation at the public hearing focused on the argument that the denial of the "THE" Academy All Girls Charter School amended application was in the best interests of the students, school district, and community. SCS grounded its argument in the deficiencies found by the SCS review committee in the amended application after conducting a review process aligned to the National Association of Charter School Authorizer standards. Specifically, SCS found that "THE" Academy All Girls Charter School's application did not meet the standard for approval based on the lack of a clear academic model, strategies being misaligned to measurable goals, a lack of mission specific goals and lack of a compelling statement regarding why a single gender option is critical for the target population. SCS also expressed concerns with the Sponsor's plans for remediation and the school based assessment lacked specificity. Lastly, the district noted that the professional development plan and the facilities plan were unclear.

In response, the Sponsors highlighted their passion and desire to open the first all girl's charter school in Memphis. "THE" Academy All Girls Charter School believes that there is a need for creative education, which they hope to achieve by chartering a single-sex, K-5 school that focuses on academics and arts. They advocate the single sex environment where "girls will take center stage" because they believe it will foster a caring and nurturing environment where young ladies can express themselves freely, which will raise their confidence and help them perform in middle school, high school, and postsecondary school. They expressed their commitment to improving outcomes for young ladies who are disadvantaged, English language learners, and/or who have disabilities in the midtown neighborhood of Memphis through enhancing real world problem solving skills, providing a personalized school experience, focusing on literacy in primary grades, and using multiple intelligence strategies. The Sponsor articulated its goals of having their students reading at or above grade level by the 3rd grade. Using each student's data as a driving force, the Sponsor expressed their desire to provide student-centered classrooms that will help students to set goals, work hard, and meet challenges in global society, in addition to developing students' character.

⁶ T.C.A. § 49-13-109.

A portion of the public hearing was dedicated to taking public comment. A total of three people made verbal comments in support of "THE" Academy All Girls Charter School at the hearing, including an educator, a colleague of the executive director, and an affiliate of Girls, Inc. in Memphis. In addition, the State Board received written feedback on "THE" Academy All Girls Charter Schools' application in person at the public hearing and via email.

ANALYSIS

State law requires the State Board to review the decision of the local board of education and determine whether the denial of the proposed charter school was in the "best interests of the pupils, school district, or community."⁷ In addition, T.C.A. § 49-13-108 requires the State Board to adopt national standards of authorizing. One such standard is to maintain high standards for approving charter applications. In making my recommendation to the Board, I have considered the Review Committee Report, the arguments made by both "THE" Academy All Girls Charter School and SCS at the Public Hearing, and the public comments received by State Board staff and conclude as follows:

The Review Committee's report and recommendations are thorough and cite specific examples in the application and reference information gained at the capacity interview in support of its findings. For the reasons explicated in the report, I agree that the "THE" Academy All Girls Charter School amended application did not rise to the level of meeting or exceeding the standards required for approval.

Given the great responsibility of educating students and the amount of public funds entrusted to a charter school that is approved by a local district, the State Board expects that only those schools that have demonstrated a high likelihood of success and meet or exceed the required criteria in all areas will be authorized. While the Sponsor's desire, passion, and dedication to serve female students in the Memphis community is readily apparent and commendable, I agree with SCS that significant concerns remain about the ability of the Sponsor to successfully open and operate the proposed school in a manner that will improve academic outcomes for their target population.

CONCLUSION

For these reasons, and for the reasons stated in the Review Committee Report attached hereto, I do not believe that the decision to deny the amended application for "THE" Academy All Girls Charter School was contrary to the best interests of the students, the school district, or the community. Therefore, I recommend that the State Board affirm the decision of SCS to deny the amended application for "THE" Academy All Girls Charter School.



Dr. Sara H. Morrison, Executive Director
State Board of Education

10/16/17
Date

⁷ T.C.A. § 49-13-108.



EXHIBIT A

Charter Application Review Committee Recommendation Report

School Name: "THE" Academy All Girls Charter School

Sponsor: Glory Community Development Corporation

Proposed Location of School: Shelby County Schools

Evaluation Team:

Leigh Cummins

Grant Monda

Addison Old

Leslie Pack

Tess Stovall

Jay Whalen



This recommendation report is based on a template from the National Association of Charter School Authorizers.



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Introduction

Tennessee Code Annotated (T.C.A) § 49-13-108 allows the sponsors of a public charter school to appeal the denial of an application by the local board of education to the State Board of Education. In accordance with T.C.A. § 49-13-108, the State Board of Education shall conduct a de novo, on the record, review of the proposed charter school's application, and the State Board of Education shall adopt national authorizing standards. As laid out in State Board Policy 6.200 – Core Authorizing Principles, the State Board committed to implementing these authorizing standards aligned with the core principles of charter school authorizing including setting high standards for the approval of charter schools in its portfolio.

The State Board of Education's charter application review process is outlined in T.C.A. § 49-13-108, State Board Policy 2.500 – Charter School Appeals, and State Board Policy 6.300 – Application Review. The State Board assembled a charter application review committee comprised of highly qualified internal and external evaluators with relevant and diverse expertise to evaluate each application. The State Board provided training to all review committee members to ensure consistent standards and fair treatment of all applications.

Overview of the Evaluation Process

The State Board of Education's charter application review committee developed this recommendation report based on three key stages of review:

1. **Evaluation of the Proposal:** The review committee independently reviewed the amended charter application, attachments, and budget submitted by the sponsor. After an independent review, the review committee collectively identified the main strengths, concerns, and weaknesses as well as developed specific questions for the applicant in the three sections of the application: Academic Plan Design and Capacity, Operations Plan and Capacity, and Financial Plan and Capacity.
2. **Capacity Interview:** Based on the independent and collective review of the application, the review committee conducted a 90-minute in-person interview with the sponsor, members of the proposed governing board, and identified school leader (if applicable) to address the concerns, weaknesses, and questions identified in the application, and to assess the capacity to execute the application's overall plan.
3. **Consensus Judgment:** At the conclusion of the review of the application and the capacity interview, the committee submitted a final rubric and developed a consensus regarding a rating for each section of the application.

This recommendation report includes the following information:

1. **Summary of the Application:** A brief description of the applicant's proposed academic, operational, and financial plans.
2. **Summary of the Recommendation:** A brief summary of the overall recommendation for the application.



3. Analysis of Each Section of the Application: An analysis of the three sections of the application and the capacity of the team to execute the plan as described in the application.
 - a. Academic Plan Design and Capacity: school mission and goals; enrollment summary; school development; academic focus and plan; academic performance standards; high school graduation standards (if applicable); assessments; school schedule; special populations and at-risk students; school culture and discipline; marketing, recruitment, and enrollment; community involvement and parent engagement; and the capacity to implement the proposed plan.
 - b. Operations Plan and Capacity: governance; start-up plan; facilities; personnel/human capital; professional development; insurance; transportation (if applicable); food service; additional operations (if applicable); waivers; and the capacity to implement the proposed plan.
 - c. Financial Plan and Capacity: budget narrative; budget; cash flow projections; related assumptions; financial policies and procedures; and the capacity to implement the proposed plan.

The State Board's charter application review committee utilized the Tennessee Department of Education's Charter School Application Evaluation Ratings and Sample Scoring Criteria ("the rubric"), which is used by all local boards of education when evaluating an application. The rubric states:

An application that merits a recommendation for approval should present a clear, realistic picture of how the school expects to operate; be detailed in how this school will raise student achievement; and inspire confidence in the applicant's capacity to successfully implement the proposed academic and operational plans. In addition to meeting the criteria that are specific to that section, each part of the proposal should align with the overall mission, budget, and goals of the application.

The evaluators used the following criteria and guidance from the scoring rubric to rate applications:

Rating	Characteristics
Meets or Exceeds the Standard	The response reflects a thorough understanding of key issues. It clearly aligns with the mission and goals of the school. The response includes specific and accurate information that shows thorough preparation.
Partially Meets Standard	The response meets the criteria in some aspects, but lacks sufficient detail and/or requires additional information in one or more areas.
Does Not Meet Standard	The response is significantly incomplete; demonstrates lack of preparation; is unsuited to the mission and vision of the district; or otherwise raises significant concerns about the viability of the plan or the applicant's ability to carry it out.



Summary of the Application

School Name: "THE" Academy All Girls Charter School

Sponsor: Glory Community Development Corporation

Proposed Location of School: Shelby County Schools

Mission:¹ "THE" Academy All Girls Charter School will provide a culturally diverse atmosphere where girls in kindergarten through fifth grade will experience excellence in academics and the arts, preparing them to become passionate learners in a global society.

Number of Schools Currently in Operation by Sponsor: 0

Proposed Enrollment:²

Grade Level	Year 1 (2018)	Year 2 (2019)	Year 3 (2020)	Year 4 (2021)	Year 5 (2022)	At Capacity (2023)
K	80	80	80	80	80	80
1	0	80	80	80	80	80
2	0	0	80	80	80	80
3	0	0	0	80	80	80
4	0	0	0	0	80	80
5	0	0	0	0	0	80
Total	80	160	240	320	400	480

Brief Description of the Application:

Glory Community Development Corporation ("GCDC") is proposing to open an elementary school in Memphis, Tennessee and serve female students in kindergarten through fifth (5th) grade. The school, "THE" Academy All Girls Charter School ("THE" Academy), is a new-start school. The school proposes to locate in the Midtown/Northeast section of Memphis.³ The school will employ a single-sex educational model that includes a focus on Multiple Intelligence strategies to reach every learner and target instruction to individual needs, as well as an emphasis on the arts and literacy.⁴

The proposed school will be organized under the existing non-profit entity of GCDC, and the Board of Directors will govern the school. GCDC projects the school will have \$1,270,000 in revenue and \$405,811 in expenses in Year 0, resulting in a positive ending balance of \$864,189. GCDC projects the school will have \$1,066,560 in revenue and \$1,204,525 in expenses in Year 1, resulting in a net loss of \$137,965 but positive ending fund balance of \$726,224. By Year 5, the school projects to have \$3,697,800 in revenue and \$2,909,464 in expenses, resulting in a positive ending fund balance of \$1,902,216.⁵ The

¹ "THE" Academy All Girls Charter School Application, pg. 1.

² Ibid., pg. 3.

³ Ibid., pg. 3.

⁴ Ibid., pg. 9-10.

⁵ Ibid., Attachment O – Planning and Budget Worksheet.



school anticipates that 95 percent of the student population will qualify as Economically Disadvantaged, 10 percent of the student population will be students with disabilities, and 5 percent of the student population will be English Learners.⁶

⁶ Ibid., pg. 3.



Summary of the Evaluation

The review committee recommends that the application for “THE” Academy be denied because the applicant failed to provide sufficient evidence in the academic, operational, and financial sections that the application met the required criteria of the rubric. The academic plan presented by the applicant did not fully address how the school will serve special populations or how the sponsor selected and developed the intervention plan; it also failed to provide a thorough and detailed marketing and enrollment plan.

The operations plan presented by the applicant did not demonstrate comprehensive or realistic staffing and professional development plans, and the applicant provided no contingency plans for any operational challenges the school may face. The review committee found that the proposed governing board and school leadership fell short of the experience and capacity required to successfully launch the school.

The financial plan presented by the applicant provided the review committee with no evidence of any commitment of donor funds, startup funds, or an established line of credit. The proposed budget lacked needed details and showed frequent misalignment with the academic and operational sections of the application. The applicant’s explanation of the financial plan left the review committee with significant concerns regarding the ability of the applicant to secure funding for and oversee the financial operations of the proposed school.

Summary of Section Ratings

In accordance with the Tennessee Department of Education’s charter application scoring rubric, “applications that do not meet or exceed standard in every area...will be deemed not ready for approval,” and strengths in one area of the application do not negate material weaknesses in other areas.⁷ Opening and maintaining a successful, high-performing charter school depends on having a complete, coherent plan and identifying highly capable individuals to execute that plan.

Sections	Rating
Academic Plan Design and Capacity	Does Not Meet Standard
Operations Plan and Capacity	Does Not Meet Standard
Financial Plan and Capacity	Does Not Meet Standard

⁷ Tennessee Charter School Application – Evaluation Ratings and Sample Scoring Criteria, pg. 1.



Analysis of the Academic Plan Design and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee:

The applicant's Academic Plan Design and Capacity does not meet the standard because the plan to serve special populations is incomplete, the academic model and intervention plan are lacking, the marketing and enrollment plan is unclear, the usage of data and assessment is vague, and the school schedule does not align with the stated mission.

Regarding the plan to serve special populations, the review committee determined that the applicant did not provide a clear plan for the provision of required services or staffing. The applicant's plan is not fully developed and is heavily dependent on student IEPs already being in place—which is unlikely for students who enter the school in Kindergarten. The review committee found that the applicant is unprepared for alternate scenarios outside of their given projections of special populations. More specifically, the applicant's plan for staffing special populations (including English as a Second Language) teachers remains fluid, with insufficient answers to questions at the capacity interview to address necessary hiring decisions and school-provided services. The applicant stated that they intend to make staffing adjustments as necessary in real-time, rather than based on hypotheticals, and have therefore not yet thought through staffing contingency plans. Altogether, the review committee did not find adequate evidence that the applicant has developed a viable plan to identify, support, and instruct special populations at "THE" Academy.

The applicant was unable to provide the review committee with any data or research to support the school's selected academic model, intervention strategies, or Response to Instruction and Intervention (RTI²) program. The review committee is concerned that the applicant intends to select the school's intervention programs and other software/technology based on cost, rather than proven success. The applicant described their intent for teachers to plan and implement all student interventions but did not offer any plan if said interventions are unsuccessful or off-track. Additionally, the applicant does not have adequate plans for utilizing technology in academic interventions; per applicant responses during the capacity interview, the review committee observed insufficient preparedness in meeting technical accommodations (e.g., limited number of computers to be used at a given time) and legal requirements (e.g., accommodations for students with disabilities or mandatory time spent on intervention). Generally, the review committee does not have sufficient evidence that the applicant is prepared to implement a rigorous academic plan, to provide strong and supportive RTI² programming, or to integrate appropriate software and technology into the school's curriculum.

Further, the applicant lacked a contingency plan for overall school under-enrollment or if enrollment of specific student populations exceeds initial projections. The applicant was unable to provide a complete rationale for the given enrollment projections. Also, in the capacity interview, the applicant provided a vague explanation of their marketing plan and recruitment strategy; therefore, the review committee did not find compelling evidence of community demand for "THE" Academy nor sufficient documentation to demonstrate local support of the proposed school.

The review committee determined the applicant's plan for assessment and data analysis was deficient. While the applicant addressed their plan to use NWEA MAP assessments for student benchmarking and easyCBM for interventions, there was not a sufficient explanation for assessment at the school or classroom level. With the exception of daily exit tickets and a Kindergarten screener (Kindergarten Entry Inventory), there is no proof that the assessment selection and plan will provide



sufficiently rich data for evaluation of the program and align with state standards, particularly given the lack of state assessment data through the year 2021 as the school adds grade levels. Generally, the applicant does not have a defined and cohesive strategy for collecting and analyzing student data to inform instruction. The applicant plans to utilize Shelby County's data warehouse for these services, but there is no confirmed agreement between the parties and any fiscal impact of this contract is not reflected in the budget.

Finally, the school's daily schedule and slate of classes is not in alignment with the expectations and priorities outlined both in the application and capacity interview. The school's mission explicitly seeks to prepare students to become learners in a global society; however, there is nothing described in the curricular model or specific coursework to support this goal. Similarly, the application frequently references the school's focus on the arts. But, in the capacity interview, the applicant did not include the arts (or Performing Arts Team Support ("PATS") time) in the daily schedule of a student at "THE" Academy; rather, they explained that the schedule will be determined based on availability of volunteer instructors. Also, it was unclear to the review committee exactly when students would be taking part in interventions through RTI². Students in certain tiers require minimum amounts of time spent daily and weekly in intervention, and it was not evident that the applicant had a plan to meet and incorporate this into the school schedule.

Strengths Identified by the Committee:

While the Academic Plan Design and Capacity does not meet the standard because of the weaknesses described above, the review committee did find evidence of strengths within the section. Specifically, the applicant outlined a very specific mission for the school as well as a unique model to serve the target students. Additionally, the applicant is clearly passionate about education and serving students in the community.



Analysis of the Operations Plan and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee:

The applicant's Operations Plan and Capacity does not meet the standard because of concerns with the governing board and proposed school leadership, the described usage and management of the anticipated facility, an incomplete and inconsistent staffing plan, an inadequate professional development plan, and a lack of contingency planning.

Of greatest concern to the review committee is the proposed school leadership and the fluidity of the governing board's composition. The proposed executive director, while extremely passionate and a highly experienced teacher, did not present evidence demonstrating the necessary qualifications, experience, and capacity to lead and manage this school, operationally or financially. When the review committee asked about the school leader identified within the application, the applicant stated that this individual may not ultimately be the school leader and the applicant would begin a full search for a school leader upon approval. The fluidity of the plans for the school leader coupled with the lack of demonstrated leadership experience by the executive director did not convince the review committee that the leadership team would successfully implement the plan outlined in the application. Overall, the review committee did not find evidence within the application or capacity interview that the applicant brings the expertise and experience to ensure a successful school.

While the applicant did identify which of the founding board members would continue to serve on the governing board after the school opens, the applicant did not provide the review committee with a clear plan for recruiting and choosing additional board members. The review committee is also uncertain how governing board members are selected to positions of leadership, and the application detailed different governing board roles from those discussed in the capacity interview. Regardless of roles, it is evident to the review committee that the governing board lacks expertise in numerous areas—specifically marketing, accounting, facilities management, and community outreach.

The applicant, even in the capacity interview, did not believe that the marriage between a proposed member of the governing board and the executive director was a conflict of interest. While the applicant was open to changing the governing board assignments and/or the spouse resigning from the governing board altogether, it is clear to the review committee that there is a significant entanglement of interests among this proposed governing board member, executive director, and school at-large.

This lack of clarity extends to usage and management of the proposed school facility, which the applicant plans to use rent-free, indefinitely. The applicant did not provide a written letter of commitment or memorandum of understanding from the building owner, and it remains unclear if the applicant would prefer for "THE" Academy to remain housed at this site or eventually relocate to another undetermined and unidentified facility. The review committee's question regarding the \$25,000 estimate for facility renovation was not fully answered in the capacity interview; the applicant did not provide a sufficient explanation for how this number was determined or specifically on what it will be spent.

The review committee still has many questions about the proposed staffing plan. There remain numerous inconsistencies between the positions described in the application narrative, staffing chart(s), budget and budget narrative, and the capacity interview. Specifically, the review committee felt additional clarity was needed on the school's plan for: Performing Arts Team Support (PATS) instructors, special education teachers and assistants, interventionists, ESL teachers and/or interpreters, and a school



operational leader. While the review committee understands that staffing will have to be adjusted from the projected enrollment to the actual enrollment, the applicant did not provide a clear and realistic plan for making these staffing adjustments or how they would be accounted for in the budget. Similarly, the overall staffing plan (as it is unclear and fluid) remains misaligned with the academic plan and budget.

The applicant failed to provide a comprehensive and thoughtful plan for professional development (PD). The review committee found the applicant's explanation of PD to be vague; in the capacity interview, the applicant described the executive director and school leader as leaders of PD, but with teachers also involved in its selection and delivery. The applicant did not provide evidence that they have the expertise to develop, lead, or obtain PD. In the capacity interview, the applicant was unclear as to which PD would be offered when and to whom. The review committee understands that there will be summer training as well as ongoing meetings, but there is no concise plan to outline exactly how PD will occur at "THE" Academy. When asked by the review committee how the school plans to train teachers on the use of software and technology, the applicant assumed that their selected software company would come to the school and provide PD for free. The review committee does not find it reasonable to assume that any PD will be offered free of charge.

Finally, the applicant failed to provide adequate and thorough contingency plans. Both within the application and capacity interview, the applicant assumed a relationship with, and provision of many services by, Shelby County Schools (SCS). Although the applicant claims not to be in competition with SCS, there is no guarantee that (a) "THE" Academy would be authorized by SCS and participate in district services or (b) SCS would agree to contract with "THE" Academy if it were authorized by the State Board. The applicant plans to utilize SCS for food services, academic supports (e.g., special education services, curriculum maps), health services, a potential facility, and the data warehouse, to name a few. Further, the applicant did not provide the names of any alternate providers, quotes for their services, or preliminary agreements for the respective services.



Analysis of the Financial Plan and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee:

The Financial Plan and Capacity does not meet the standard because the applicant has no documented commitment of funds, has no guaranteed startup funds, has not established a line of credit, did not offer adequate contingency planning, and provided insufficient detail in the budget and corresponding narrative.

The applicant was upfront about the need to fundraise to start up and continue running “THE” Academy. Although the applicant told the review committee that they will not have any problem raising money, the school has no confirmed or documented commitment of funds from any individual donors/benefactors or businesses in the community. In Year 0, the budget projects over \$300,000 coming from these donors; in the years following, the applicant projects a minimum of \$55,000 in philanthropy, with most years relying on well over \$100,000 in donations. The review committee is not convinced of the applicant’s ability to secure this magnitude of funding over several years, particularly because there is no evidence of any identified donors.

Similarly, the applicant discussed the school’s reliance on startup funding, specifically grants from the Walton Foundation and the Charter School Program (“CSP”). The budget anticipates that in Year 0 these funds would account for nearly \$1,000,000 of revenue. Despite the applicant’s belief that these grants are “almost guaranteed,” the review committee recognizes that the CSP grant is competitive and that, at base, no funds are truly guaranteed until held by the recipient.

In the capacity interview, the review committee had questions regarding the applicant’s work to secure a line of credit, as part of their contingency plan. At present, the applicant has nothing in writing or guaranteed; and when asked about equity and/or possible collateral, the applicant described that they would use the school’s facility (which is not owned by the applicant) as collateral for the line of credit. However, there was no evidence presented in the application or during the capacity interview of this confirmed agreement with the building owner. The review committee remains concerned about the applicant’s ability to get a line of credit, as it can be a lengthy and arduous process.

The applicant plans to utilize the previously discussed philanthropy and grant funding as significant sources of revenue, especially in Years 0-1. According to the provided budget, the applicant commits to contributing \$25,000 in Year 1. Outside of the listed \$25,000, none of the other philanthropy and grant funding has been guaranteed or secured; yet, the applicant has essentially no contingency plan if they fail to raise the projected funds. This proves particularly problematic in the school’s early years, when “THE” Academy has only a few grade levels and would be therefore receive limited state and federal funds based on the number of students served. The review committee does not have sufficient proof that the applicant would possess the necessary funds to open and run the school, nor do they demonstrate likelihood of long-term financial solvency.

Finally, the budget and narrative did not offer adequate detail or specifics regarding many line items. There were numerous items mentioned in the budget narrative and/or earlier in the application which were not included in the budget (e.g., field trips, postage, assessment materials). There are also line items in the budget that are extremely vague (e.g., “misc.,” “IT,” “technology”). The budget and narrative do not explain how any potential adjustments would be made (based on dynamic staffing needs or fluctuating revenue from state BEP funds, for example). As mentioned earlier, the proposed staffing plan featured in the budget does not align with the roles mentioned elsewhere in the application.



Generally, the budget contains numerous inconsistencies, miscalculations, and errors, which made it difficult for the review committee to reconcile the budget and narrative with the rest of the application.

Given these issues, the review committee found insufficient evidence that the applicant's budget was appropriate, realistic, and viable or that the applicant could adequately secure the funding needed to support the school's operation.



Evaluation Team

Leigh Cummins is a former Policy and Research Analyst for the Tennessee State Board of Education, who supported both the charter appeals and standards review processes. Prior to the State Board, Ms. Cummins worked at the Tennessee Department of Education, supporting the development and implementation of teacher professional development within the Division of Curriculum and Instruction. She also previously served as an AmeriCorps VISTA at the University of Mississippi, coordinating a support program for first-year, at-risk college students. Ms. Cummins earned her B.A. at the University of Mississippi and her M.Ed. at Vanderbilt University.

Grant Monda serves as the Executive Director of Aurora Collegiate Academy. Aurora is a tuition-free public elementary school serving students from all over Shelby County. This is his third year at the school. He began his journey at Aurora Collegiate Academy for its final years of growth after completing the prestigious Ryan Fellowship in 2017. He also currently serves on the Charter School Compact Committee aimed at aligning and updating policies between charter schools and their local LEA. In addition to his work at Aurora, Grant has previously taught in Memphis City Schools and served as a district level coach and evaluator with Shelby County Schools. He holds a Bachelor of Arts degree from Rhodes College and a Master's in Education from Christian Brothers University.

Addison Old is pursuing her Master's of Public Policy in Education Policy at Vanderbilt University. She works as a Scorer for the Validation Study of the Diagnostic Assessment of Instructional Leadership, and as a Research Assistant for the Fuchs Accelerating Academic Achievement Reading Comprehension Team. Addison recently completed a practicum experience with the Tennessee Department of Education, where she aided in the strategic compensation plan approval process. Prior to beginning graduate school, Addison taught 5th grade math at a magnet school in Nashville. She holds a Bachelor of Science degree in Elementary Education and Human & Organizational Development from Vanderbilt University.

Leslie Pack serves as a Managing Director for First Tennessee Bank on their Healthcare Sponsor Finance team. With over 12 years of Corporate and Investment Banking experience, Leslie provides a full array of capital markets and treasury solutions for middle market healthcare private equity transactions across the U.S. Prior to joining First Tennessee, she worked in Healthcare Banking at Regions Bank in addition to capital markets and investment banking roles at Asurion, Citigroup Global Markets, and Bank of America Merrill Lynch. Leslie received a BS in Accounting from the University of Richmond, a MBA in Finance from Wake Forest University, and is a Certified Public Accountant. She is also a Board of Directors member for Valor Collegiate Academies in Nashville.

Tess Stovall serves as the Director of Charter Schools for the Tennessee State Board of Education. In this role, she manages the charter school application process and authorization duties of the State Board, and she was a member of the 2015 National Association of Charter School Authorizer's Leaders Program. Prior to joining the staff of the board, she served as the Transformation Facilitator at Cameron Middle School, the first district-led conversion of a traditional public school to a charter school in Metropolitan Nashville.



Public Schools. While in Washington, D.C., Tess worked for Congressman Jim Cooper (TN-05) and a centrist think tank, Third Way, on economic and education policy. She is a Phi Beta Kappa graduate of The George Washington University earning a Bachelor of Arts Degree in Political Science and Sociology and a graduate of the London School of Economics with a Master of Science Degree in Political Sociology.

Jay Whalen serves as Deputy Director of Charter Schools for the Tennessee State Board of Education. In this role he works on the charter school application process and authorization duties of the State Board. Prior to joining State Board staff, Jay was the Data Analyst at KIPP Nashville, a charter school organization operating multiple schools in Metropolitan Nashville Public Schools. He was responsible for all data management, collection, analysis, and reporting for the region. Jay is a former high school social studies teacher, spending time in both rural and urban Title I public schools, and has also done consulting work for the Tennessee Department of Education. He holds Bachelor of Arts degrees in Secondary Education and History from the University of Rhode Island.



"THE" Academy All Girl's Charter School Deny

Proposed School Name	Proposed School Focus	Proposed Region/Location
"THE" Academy All Girl's Charter School	All girls elementary school focused on academics and the arts	NE Memphis (Klondike, Vollentine, Springdale)

School Mission

"THE" Academy All Girls Charter School will provide a culturally diverse atmosphere where girls in grades kindergarten through fifth grade will experience excellence in academics and the arts, preparing them to become passionate lifelong learners in a global society.

School Plan Summary

As stated in the application "As a single-sex charter school our curriculum is built upon the concepts of excellence in academics, arts, attributes, the components of structured learning, literacy environment, and expressing themselves through the seven distinct multiple intelligences. Our culturally diverse atmosphere to achieve academic excellence will be one in which all girls are challenged and supported to succeed regardless of race, class, and /or culture. We will ensure that our 5th grade girls are fully prepared for the demands and opportunities of a rigorous middle school program and thus ensuring that all girls will be on the path to succeed in high school and college. Academic success will be measured using internal and external assessments aligned to Tennessee Blue Print and the Common Core Standards.

Leadership and Governance

Full Name	Current Job Title and Employer	Position with Proposed School
Donna Graves	Retired entrepreneur	Board member
Clarice Loggins	Teacher, Rozelle Elementary School, SCS	Founder/Executive Director
Rod Loggins	Area Manager, Bancorp South	Board member
Bruce Newman	Attorney, Newman and Decoster	Board member
Claudia Robinson	Teacher, Rozelle Elementary School, SCS	Non-voting board member
Jeronica Logan	Director of Development and External Relationships, Carondelet Leadership Academy	Board member
Earlene Holloway	Retired teacher, Shelby County Schools	Board member
Chanda Donald	Teacher, Shelby County Schools	School Director

Proposed Grade Structure and 5-year Enrollment Projections

Academic Year	Planned # of Students	Maximum # of Student	Grades Served
2018-2019	80	80	K
2019-2020	160	160	K-1
2020-2021	240	240	K-2
2021-2022	320	320	K-3
2022-2023	400	400	K-4

Application Ratings and Comments by Section

This section should include a summary of comments from all reviewers.

Section/Rating	Strengths/Highlights	Concerns/Areas for Improvement
Academic Plan Design and Capacity <input type="checkbox"/> Meets or Exceeds <input checked="" type="checkbox"/> Partially Meets <input type="checkbox"/> Does Not Meet		<p>There is not a clear academic model described for the proposed school. Additionally, there are no clear and concise goals for academic achievement. An array of strategies are described, yet aren't attached to measurable goals. The overall mission and vision of the school was not demonstrated throughout the description of the proposed academic programming. In addition, a compelling overview of the need for an all-girls school based on data provided for the target demographic and proposed location was not provided. There is a lack of clarity surrounding certain school culture aspects (i.e. acculturation).</p>
Operations Plan and Capacity <input type="checkbox"/> Meets or Exceeds <input checked="" type="checkbox"/> Partially Meets <input type="checkbox"/> Does Not Meet		<p>The application does not provide clarity regarding the content/context of professional development for staff. Additionally, there aren't clear professional development opportunities outlined that enhance the prospective school's mission and vision. There is also an absence of an ELL teacher role/expectations description. The delineation between an "Executive Director" and "School Leader" are unclear. There are also concerns with the plans for securing a long-term facility. Considering the conflict of interest resulting from the personal relationship between a founding board member and the proposed founder/executive director, there were no assurances to address any potential issues regarding adherence to accountability practices</p>
Financial Plan and Capacity <input type="checkbox"/> Meets or Exceeds <input type="checkbox"/> Partially Meets <input checked="" type="checkbox"/> Does Not Meet		<p>There is a substantial dependence on grants to secure operational feasibility; however, there is no evidence of contingency plans perchance the necessary grants aren't secured.</p> <p>There is a negative cash flow during Year 1 to end the first year of operations at a</p>

		loss. The growth projections (50%) are unreasonable. The stated contingency plan is not enough to sustain operations past the start-up period.
Performance Record (if applicable) <input type="checkbox"/> Meets or Exceeds <input type="checkbox"/> Partially Meets <input type="checkbox"/> Does Not Meet	n/a	n/a