
BEFORE THE TENNESSEE STATE BOARD OF EDUCATION

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)
IN RE:) **State Board of Education Meeting**
Cornerstone Prep School) **September 21, 2020**
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 a new charter school may appeal the denial of their amended application by a local board of education to the State Board of Education (State Board). On August 7, 2020, the Sponsors of Cornerstone Prep School (CPS) appealed the denial of its amended application by the Shelby County Schools (SCS) Board of Education to the State Board.

Based on the following procedural history, findings of fact, analysis, and Review Committee Report attached hereto, I believe that the decision to deny the CPS amended application was “contrary to the best interests of the students, LEA, or community.”¹ Therefore, I recommend that the State Board overturn the decision of the SCS Board of Education to deny the amended application for CPS.

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 conducted a de novo, on the record review of the CPS 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 design and capacity, operations plan and capacity, financial plan and capacity, 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

¹ T.C.A. § 49-13-108.

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

³ T.C.A. § 49-13-108. Due to the public health emergency, the public hearing was held virtually.

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 amended charter application was contrary to the best interests of the students, local education agency (LEA), or community.⁴ Because CPS 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 December 3, 2019, the Sponsor submitted a letter of intent to SCS expressing its intention to file a charter school application.
2. The Sponsor submitted its initial application for CPS to SCS on February 3, 2020. SCS assembled a review committee to review and score the CPS application.
3. On March 3, 2020, the SCS review committee held a capacity interview with the Sponsor.
4. SCS's review committee reviewed and scored the CPS initial application and recommended to SCS Board of Education that the initial application be denied based on the charter application scoring rubric and SCS Board policy #1011 – Charter Schools. The policy states, "The district shall consider whether the establishment of a proposed charter school in a particular geographic location of the LEA is feasible or will create oversaturation in the proposed geographic location."
5. On April 28, 2020, the SCS Board of Education voted to deny the CPS initial application based upon the review committee's recommendation.
6. The Sponsor amended and resubmitted its application for CPS to SCS on May 28, 2020.
7. SCS's review committee reviewed and scored the CPS amended application and again recommended denial based on the charter application scoring rubric and SCS Board policy #1011.
8. On July 28, 2020, based on the SCS review committee recommendation and SCS Board policy #1011, the SCS Board of Education voted to deny the CPS amended application.
9. The Sponsor appealed the denial of the CPS amended application in writing to the State Board on August 7, 2020, 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 proposed corrections to the application as allowed under T.C.A. § 49-13-108(b)(4).
11. The State Board's review committee independently analyzed and scored the CPS amended application using the Tennessee Department of Education's charter application scoring rubric.

⁴ Ibid.

12. On September 2, 2020, State Board staff held a virtual public hearing. At the public hearing, the executive director, sitting as the State Board’s designee, heard presentations from the Sponsor and SCS and took public comment regarding the CPS application.
13. The State Board’s review committee conducted a capacity interview with the founding board of CPS and key members of the leadership team on September 4, 2020. Due to the COVID-19 public health emergency, the capacity interview was held virtually.
14. After the capacity interview, the State Board’s review committee determined a final consensus rating of the CPS amended application, which served as the basis for the Review Committee Recommendation Report, attached hereto as **Exhibit A**.

FINDINGS OF FACT

- **District Denial of Application.**

The review committee assembled by SCS to review and score the CPS initial and amended applications consisted of the following individuals:

Name	Title
Tamara Lumpkin	Education Director, Sowing Empowerment and Economic Development
Jack Vuylsteke	Memphis RISE Academy
Audra Block	Community Stakeholder/Parent
Dr. David Wilkins	Shelby County Schools, Mental Health
LaTonya Goodman	Shelby County Schools, Finance
Rhonda Hill	Shelby County Schools, Student Support
Ivory Stewart	Shelby County Schools, Exceptional Children
Suzanne Shovlin	Shelby County Schools, Curriculum and Instruction
Ezra Howard	Shelby County Schools, English Language Learners
Arby Martin	Shelby County Schools, Professional Development
Tonye Smith McBride	Shelby County Schools, Highly Specialized Advisor, Strategy and Performance Management
Brittany Monda	Shelby County Schools, Assistant Superintendent, Office of Charter Schools
LaTricea Adams	Shelby County Schools, Director of Organizational Quality, Office of Charter Schools (Amended Application Only)
Joshua Perkins	Shelby County Schools, Advisor, Academic Quality & Accountability, Office of Charter Schools

The CPS initial application received the following ratings from the SCS review committee:

Sections	Rating
Academic Plan Design and Capacity	PARTIALLY MEETS STANDARD

Operations Plan and Capacity	PARTIALLY MEETS STANDARD
Financial Plan and Capacity	PARTIALLY MEETS STANDARD
Portfolio Review/Performance Record	PARTIALLY MEETS 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 April 28, 2020. Based on the review committee’s recommendation, the SCS Board of Education voted to deny the initial application of CPS.

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	MEETS OR EXCEEDS STANDARD
Portfolio Review/Performance Record	PARTIALLY MEETS 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 July 28, 2020. Based on this recommendation, the SCS Board of Education voted to deny the amended application of CPS.

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

Following the denial of the CPS amended application and subsequent appeal to the State Board, State Board staff assembled a diverse review committee of internal and external experts to independently evaluate and score the CPS amended application. This review committee consisted of the following individuals:

Name	Title
Lisa Baldwin	Assistant Professor of Practice, Relay Graduate School of Education
Michelle Doane	Independent Education Consultant
Ali Gaffey	Deputy Director of Charter Schools, State Board of Education
Diarese George	President, Tennessee Educators of Color Alliance
Andrew Sullivan	Chief of Staff, Office of Councilmember Kristin Gisleson, New Orleans
Teneicesia White	School Leader, Aurora Collegiate Academy

The review committee conducted an initial review and scoring of the CPS 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 CPS amended application was as follows:

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

Sections	Rating
Academic Plan Design and Capacity	MEETS OR EXCEEDS STANDARD
Operations Plan and Capacity	MEETS OR EXCEEDS STANDARD
Financial Plan and Capacity	MEETS OR EXCEEDS STANDARD
Portfolio Review/Performance Record	PARTIALLY MEETS STANDARD

The review committee has recommended denial of the application for CPS because, while the academic, operational, and financial plans meet or exceed the standard, the CPS application did not meet the required criteria of the rubric in the performance record section of the application.

The review committee found the CPS amended application included a strong academic plan that is aligned to the school’s mission and vision, is well-developed, and has contributed to all three (3) of the schools currently in operation by the Cornerstone network moving off the Priority School List. Additionally, the application included rigorous, measurable, and realistic academic achievement goals with a strong plan for data analysis. Finally, the review committee found the CPS application included clear strategies for building upon existing community partnerships and creating new partnerships that will benefit the students and families of the proposed school.

The operations plan presented in the CPS application highlighted the Sponsor’s experience through clear plans and contingencies for all major operational components of the school, including a start-up plan with specific tasks and responsibilities, a process for securing a facility, and a proposal to alter its transportation plan based on the needs of enrolled families. In addition, the Sponsor has established a strong leadership team with the capacity to provide key supports for its staff members, including on-going professional development and the creation of a new network-level role specifically focused on supporting school leaders.

The review committee also found the financial plan meets or exceeds the standard because of the reasonable and realistic operating budgets included in the application, the network’s strong financial health, and the inclusion of several sound contingency plans to meet the proposed school’s financial needs should anticipated revenues be lower than estimated.

However, with regard to the applicant’s portfolio review/performance record, the review committee found that the CPS amended application lacked sufficient evidence that the network’s existing schools are meeting state standards, as required by the state rubric. While the review committee acknowledged the continuous growth the network is making collectively and its success in moving all three (3) of its turnaround schools off the Priority School List, the review committee was unable to score this section as meets or exceeds standard due to the specific criteria stated in the rubric. The review committee noted that the rubric did not provide clarity on how to differentiate the performance of an existing operator with turnaround charter schools versus an operator with traditional, new start charter schools. The review committee noted it is possible that they could have rated this section as meets or exceeds standard rather than partially meets standard had the rubric provided this clarity. Still, for this reason alone, the review committee was unable to recommend approval of the CPS amended application.

For additional information regarding the review committee's evaluation of the CPS amended application, please see **Exhibit A** for the complete Review Committee Recommendation 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 was held virtually on September 2, 2020. SCS's presentation at the public hearing focused on the deficiencies found by the SCS review committee in the academic, operations, and past performance sections of the CPS application. SCS outlined concerns with the academic plan, including support for special populations of students including special education and English learner (EL) students, as well as a lack of community support and understanding of student demographics in the proposed community. With regard to the operations section, SCS outlined deficiencies including an unrealistic plan for recruitment and retention of licensed teachers and a lack of training for staff supporting special education and EL students. Finally, SCS argued the amended application failed to meet the standard on past performance due to reliance on NWEA MAP data⁷ and TCAP growth data without strong proficiency data on TCAP assessments. While SCS recognized that the Sponsor's current schools within the Achievement School District (ASD) are in good standing, they noted an overall insufficient comparison of the operator's ASD schools with SCS and the state. SCS noted they look for consistently high growth and achievement data of the Sponsor's existing schools to merit approval, which SCS determined the Sponsor could not show. In response to questions from State Board staff, SCS noted the current application rubric does not differentiate between an operator with turnaround schools versus an operator with new start charter schools when analyzing past performance of an existing operator. Due to this, SCS noted they look for evidence of proficiency and growth, noting the current operator's proficiency data was not strong enough to demonstrate they were high performing when compared to the district and state.

In response to SCS, the Sponsor highlighted how they believe their schools are a benefit to the students, the district, and the community, noting that its current turnaround schools within the ASD are performing better than when they were under the operation and control of SCS and that 93% of parents state they would recommend their school to a friend. The Sponsor highlighted their work in the communities where their current schools are located, including the provision of wrap-around services for students utilizing community partnerships with Memphis Le Bonheur and Communities in Schools, replacement of "unhealthy" homes in the community, tutoring and afterschool activities for students, and an investment of over \$800,000 to renovate existing school buildings, even though the buildings will eventually have to be returned to SCS. Additionally, the Sponsor noted that their current schools outperform the SCS schools that are located in the target community of CPS. In response to concerns noted by SCS regarding their ability to serve EL students, the Sponsor noted their special education and EL performance data runs counter to SCS's concerns, as current schools have received the highest rating on the state report card for EL students and special education students are growing at their expected rate. In response to concerns regarding the performance of the Sponsor's existing schools, the Sponsor

⁶ T.C.A. § 49-13-108(b)(4).

⁷ NWEA MAP stands for Northwest Evaluation Association (NWEA) Measure of Academic Progress (MAP) and is a national normed benchmark assessment.

highlighted that their current schools consistently outperform all other ASD schools on TN Ready achievement and have consistently high TCAP and NWEA MAP growth scores. The Sponsor also highlighted that for non-tested grades, 81% of students have hit their NWEA MAP goals. The Sponsor acknowledged challenges with urban mobility at its schools and SCS as a whole, noting that due to mobility its schools must focus on growth data as students are moving in and out every year.

In response to questions from State Board staff, the Sponsor highlighted that its schools are able to demonstrate success by state standards, citing data that its Lester Prep campus has earned a TVAAS 5 three (3) years in a row, its Denver campus school set a record in Memphis with a math proficiency rate of 30% on track/mastered, and that their schools have the highest success rate of any schools in the ASD. Finally, the Sponsor explained its selection of the Sherwood/Parkway Village community, noting SCS schools in the area have low TVAAS scores, multiple schools on the priority list, and the highest percentage of schools with an SCS School Performance Framework (SPF) score below a 3.0. Additionally, the Sponsor highlighted its selection of an experienced Memphis school leader to serve as principal of CPS and outlined additional community engagement that she has undertaken in the community since she began work in June.

A portion of the public hearing was dedicated to taking public comment, which was read aloud by State Board staff. Twelve (12) public comments were received from parents in support of the school. The State Board also provided a window for members of the public to submit written comments. The State Board received four (4) additional written comments in support of the school's approval.

- **Alignment of Shelby County Schools' Application Process to State Board Quality Authorizing Standards**

State Board staff collected and analyzed detailed information regarding SCS's application review process to determine alignment with State Board Quality Authorizing Standards as set forth in State Board policy 6.111. SCS executed an application process that was fair, transparent, and focused on quality with rigorous criteria for approval. As evidence of this, SCS utilized the State Charter Application, formed a review committee made up of both internal and external experts trained on the process to evaluate each application, and hosted a capacity interview with each applicant to ensure a fair review. Based on the information presented by SCS, this part of the district's process appears in alignment with State Board Quality Authorizing Standards.

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 contrary to the "best interests of the students, LEA, or community."⁸ In addition, pursuant to T.C.A. § 49-13-108, the State Board adopted Quality Charter Authorizing Standards set forth in State Board policy 6.111 and utilizes these standards to review charter applications received upon appeal. In making my recommendation to the Board, I have considered the Review Committee's Recommendation Report, the documentation submitted by both the

⁸ T.C.A. § 49-13-108.

Sponsor and SCS, the arguments made by both parties 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, citing specific examples in the application and referencing information gained at the capacity interview in support of its findings. For the reasons explicated in the report, I agree that the CPS amended application has met all requirements for approval in the academic, operational, and financial sections of the application. Specifically, the academic plan is aligned to the school's mission and vision, is well-developed, and has contributed to all three (3) of the schools currently in operation by the Cornerstone network moving off the Priority School List. Additionally, the CPS application included clear strategies for building upon existing community partnerships and creating new partnerships that will benefit the students and families of the proposed school. The operations plan contains clear plans and contingencies for all major operational components of the school, including a start-up plan with specific tasks and responsibilities, a process for securing a facility, and a strong identified leader for the school who is from Memphis and has already begun building community relationships and parent engagement in the proposed community. Finally, the financial plan included reasonable and realistic operating budgets, the network is in strong financial health, and the application included several sound contingency plans to meet the proposed school's financial needs.

Moreover, I agree with the review committee's finding that there is a flaw in the state's rubric when it comes to evaluating the academic performance of operators in a school turnaround context. While the CPS amended application did not meet the standard as outlined in the past performance section of the state rubric, it is my recommendation that the State Board approve the CPS amended application due to the rubric's failure to provide any differentiation for the evaluation of an existing operator who operates schools in a turnaround environment rather than new start charter schools. The state's rubric specifically requires "evidence that the operator's schools are high performing and successful by meeting state standards and national standards."⁹ Performance on state standards is evaluated by looking at school performance on TNReady assessments, which in Tennessee is broken down into two (2) types of performance: student achievement and student growth. I recognize that a school's ability to demonstrate success in both areas is important, however, the rubric fails to delineate how operators with turnaround charter schools should be evaluated and what threshold would meet these past performance standards. Representatives from SCS also recognized at the public hearing that the rubric does not currently provide any such differentiation between existing operators who operate turnaround versus new start charter schools.

The Sponsor's current schools are all turnaround schools within the ASD, indicating that the Sponsor has been willing to assume the challenge of taking over zoned SCS schools that were in the bottom 5% of schools in the state with the mission of improving school and student performance. Not only has the Sponsor worked over the past eight (8) years in Memphis to successfully move all three (3) of its existing turnaround schools in the ASD off the priority school list, it has the highest performing schools of all schools in the ASD and its schools have a track record of strong TVAAS growth scores. While growth certainly is not everything, the Sponsor has provided evidence that math proficiency scores at its

⁹ Tennessee Charter School Application Evaluation Rubric – Ratings and Sample Scoring Criteria, pg. 41.

Denver campus outperform not only the ASD, but the SCS district average as well. Additionally, student performance on NWEA MAP assessments is strong and shows that students are learning at a high level.

As required by the State Board’s Quality Authorizing Standards, and State Board policy 6.200 Core Authorizing Principles, the State Board is tasked with setting a high but attainable bar for approval of charter schools in its portfolio. It is my assessment that the current state rubric sets an unreasonable bar for any operator that takes on the task of turnaround work. The requirement that an operator with turnaround schools demonstrate both growth and proficiency data on par with state and national standards before opening a new school is not a standard that is ultimately in the best interest of students and families. As we can see in this case, the Sponsor has the highest performing schools in the ASD and is outperforming other SCS schools in the area it proposes to locate. If the performance of its turnaround schools does not merit approval for this Sponsor to open its first new start charter school under the current rubric, it appears it will be difficult for any other ASD operator to meet the standard of the rubric for approval. Additionally, based on the record compiled during this appeal, including the Review Committee Report and information gained at the public hearing, I am confident that the Sponsor’s track record in Memphis demonstrates that approval of another school is in the best interest of the students, and the community.

Therefore, for the reasons outlined above, I recommend that the State Board approve the CPS amended application.

CONCLUSION

For these reasons, and for the reasons stated in the Review Committee Report attached hereto as **Exhibit A**, I believe that the decision to deny the amended application for Cornerstone Prep School was contrary to the best interests of the students, the LEA, or the community. Therefore, I recommend that the State Board overturn the decision of the SCS Board of Education to deny the amended application for Cornerstone Prep School and authorize the school.



Dr. Sara Morrison, Executive Director
State Board of Education

9/16/2020

Date



EXHIBIT A

Charter Application Review Committee Recommendation Report

September 14, 2020

School Name: Cornerstone Prep School

Sponsor: Capstone Education Group, Inc.

Proposed Location of School: Shelby County Schools

Evaluation Team:

Lisa Baldwin
Michelle Doane
Ali Gaffey
Diarese George
Andrew Sullivan
Teneicesia White

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 sponsor 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 has adopted national and state authorizing standards. As laid out in State Board policy 6.200 - Core Authorizing Principles, the State Board is committed to implementing these authorizing standards that are aligned with the core principles of charter school authorizing, including setting high standards for the approval of charter schools in its portfolio.

In accordance with T.C.A. § 49-13-108, the State Board adopted State Board policy 6.111 - Quality Charter Authorizing Standards. The State Board has aligned the charter school appeal process to these high standards to ensure that the well-being and interests of students are the fundamental value informing all State Board actions and decisions. The State Board publishes clear timelines and expectations for applicants, engages highly competent teams of internal and external evaluators to review all applications, and maintains rigorous criteria for the approval of a charter school. Annually, the State Board evaluates its work to ensure its alignment to national and state standards for quality authorizing and implements improvement when necessary.

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 four sections of the application: Academic Plan Design and Capacity, Operations Plan and Capacity, Financial Plan and Capacity and Portfolio Review/Performance Record.
2. **Capacity Interview**: Based on the independent and collective review of the application, the review committee conducted a 90-minute virtual interview with the sponsor, members of the proposed founding board, and identified school leader 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, operations, 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 four 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.
 - d. Portfolio Review/Performance Record: evidence of successful student outcomes in network; evidence that schools within network are high-performing; detailed narrative of high-performing and low-performing schools; latest audit presented without findings; and organization in good standing with authorizers.

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 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: Cornerstone Prep School

Sponsor: Capstone Education Group, Inc.

Proposed Location of School: Shelby County Schools

Mission:¹ Equip all students with the Wisdom and Knowledge necessary to succeed in college and to become leaders in the community.

Number of Schools Currently in Operation by Sponsor: 3

Memphis (3): The sponsor has three (3) operating charter schools authorized by the Achievement School District: Cornerstone Prep Denver Campus, Cornerstone Prep Lester Campus, and Lester Prep.

Proposed Enrollment:²

Grade Level	Year 1 (2021)	Year 2 (2022)	Year 3 (2023)	Year 4 (2024)	Year 5 (2025)	At Capacity (2028-29)
K	75	75	75	75	75	75
1	75	75	75	75	75	75
2	0	75	75	75	75	75
3	0	0	75	75	75	75
4	0	0	0	75	75	75
5	0	0	0	0	75	75
6	0	0	0	0	0	75
7	0	0	0	0	0	75
8	0	0	0	0	0	75
Total	150	225	300	375	450	675

Brief Description of the Application:

Capstone Education Group, Inc. (CEG) is proposing to open Cornerstone Prep School (CPS), a college preparatory K-8 school in the Sherwood/Parkway Village community of Memphis, TN.³ CPS is a new-start school that plans to rely on CEG’s academic model, referred to as the “blueprint”, to create a new opportunity for under-resourced parents and students to access a college preparatory school.⁴ CPS would be the fourth school operated by CEG.

The applicant projects the school will have \$100,000 in revenue and \$371,150 in expenses in Year 0, resulting in an operating loss of \$271,150. However, the loss will be offset by the network’s \$1,275,000 cash on hand, resulting in a positive ending fund balance of \$1,003,850. In Year 1, the applicant projects

¹ Cornerstone Prep School amended application, pg. 4.

² Ibid. pg. 14.

³ Ibid. pg. 1-2.

⁴ Ibid. pg. 4.



the school will have \$1,507,326 in revenue and \$2,206,775 in expenses, resulting in a net loss of \$699,449 and a positive ending fund balance of \$304,401. By Year 5, the school projects to have \$4,898,394 in revenue and \$4,739,414 in expenses, resulting in a net income of \$158,980 and a positive ending fund balance of \$451,715.⁵ The school anticipates that 85% of its students will qualify as economically disadvantaged, 15% will be students with disabilities, and 15% will be English Learners (ELs).⁶

⁵ Ibid. Attachment O-Planning and Budget Worksheet.

⁶ Ibid. pg. 14.

Summary of the Evaluation

The review committee recommends denial of the application for CPS because, while the academic, operational, and financial plans meet or exceed the standard, the applicant failed to provide sufficient evidence that its existing performance record meets the required criteria of the rubric.

The academic plan presented by the applicant included a strong academic plan that is aligned to the school’s mission and vision, is well-developed, and has contributed to all three of the network’s schools moving off the Priority School List. Additionally, the application included rigorous, measurable, and realistic academic achievement goals with a strong plan for data analysis. Finally, the applicant provided clear strategies for building upon existing community partnerships and creating new partnerships that will benefit the students and families of the school.

The operational plan presented by the applicant highlighted the operator’s experience through its clear plans and contingencies for all major operational components of the school, including a start-up plan with specific tasks and responsibilities outlined, a process for securing a facility, and a proposal to alter its transportation plan based on the needs of its families. In addition, the applicant has a strong leadership team in place with the capacity to provide key supports for its staff members, including on-going professional development and the creation of a new network-level role specifically focused on supporting school leaders.

The financial plan meets or exceeds the standard because of the applicant’s reasonable and realistic operating budgets, the network’s strong financial health, and the inclusion of several sound contingency plans to meet the school’s financial needs should anticipated revenues be lower than estimated.

However, with regard to the applicant’s portfolio review/performance record, the applicant lacks sufficient evidence that its existing schools are meeting state standards, as required by the rubric. While the review committee acknowledges the continuous growth the network is making collectively and its success in moving all three of its turnaround schools off the Priority School List, the committee was unable to score this section as meets or exceeds standard due to the specific criteria stated in the rubric. For this reason alone, the review committee is unable to recommend approval of the application.

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,”⁷ and strengths in one area of the application do not negate material weaknesses in other areas. 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. The review committee’s consensus ratings for each section of the application are as follows:

Section	Rating
Academic Plan Design and Capacity	Meets or Exceeds Standard
Operations Plan and Capacity	Meets or Exceeds Standard

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



Section	Rating
Financial Plan and Capacity	Meets or Exceeds Standard
Portfolio Review/Performance Record	Partially Meets Standard

Analysis of the Academic Plan Design and Capacity

Rating: Meets or Exceeds Standard

Strengths Identified by the Committee:

The applicant's Academic Plan Design and Capacity meets or exceeds standard because the applicant's academic plan, known as "the blueprint," is aligned to the school's mission and vision, is well-developed, and has contributed to all three (3) of the network's schools moving off the Priority School List. Additionally, the applicant outlined rigorous, measurable, and realistic academic achievement goals with a strong plan for data analysis. Finally, the applicant has strategies for building upon existing community partnerships and creating new partnerships that will benefit the students and families of the school.

The applicant's academic plan centers on a college-preparatory curriculum that is grounded in the Tennessee academic standards and fully developed in the blueprint, a network document that is shared among CEG's schools and outlines the instructional model, strategies, curriculum, and academic expectations for its schools. The blueprint was developed in response to the low academic performance at CEG's first school and has evolved over time. The applicant explained that the creation of the blueprint and the staff's commitment to executing it with fidelity is what led to the network's success in moving all three (3) of its schools off the state's Priority School List. While the blueprint was not provided to the review committee in full, the applicant stated that several details within the academic plan were pulled directly from the blueprint. However, because the applicant was unable to include the blueprint in the application, the review committee found the applicant's description in the application of its plan to support its special populations of students lacked sufficient detail. During the capacity interview, the review committee pressed the applicant for evidence demonstrating successful outcomes for its special populations of students, specifically ELs and students with disabilities. In response, the applicant pointed to the network's EL growth data, as presented via the state's Report Card, and special education (SPED) growth data, as measured by NWEA MAP. Specifically, Cornerstone Prep Lester Campus earned a proficiency rate⁸ of 79.3% compared to the state's average of 49.8% during the 2018-19 school year, and the network's NWEA MAP data shows students with disabilities growing at least 1.3 years each year in every subject area across all of its schools. These data points provided the review committee with enough evidence to support the rubric's criteria which states that the academic plan will be "appropriate and effective for growing all students".

The applicant presented an academic plan aligned to several rigorous, measurable, and realistic academic achievement goals. Each of these goals are mirrored across the network's existing schools and drive each school's academic programming. These goals include specific data benchmarks for TN Ready, NWEA's MAP, and TVAAS, are based on historical results, and provide a strong foundation for the school to center its academic plan around. In addition, the applicant outlined a robust plan for assessments, ranging from weekly quizzes to quarterly interim assessments, and a comprehensive plan for data analysis, which is used to inform teachers and leaders on student progress toward the school's goals. Layered within CPS's assessment and data analysis plans lies the school's plan for intervention. The

⁸ The English proficiency rate represents the percentage of English Learners who are meeting growth standards on WIDA ACCESS.

applicant explained that the blueprint provides a replicable plan for intervention that stretches over 60 pages with a schedule that has an intervention block built in to each day and is differentiated between grades K-2 and grades 3-8. When the review committee asked for further details on the applicant's intervention plan, the applicant clarified that CPS, like all existing CEG schools, will have a point person on campus responsible for collaborating with a network-level leader, CPS's teachers, and EL and special education teams on all data points and intervention planning. The applicant also described the specific intervention curriculums used and the total time students would receive targeted interventions that are aligned to their results on MAP and recent internal assessments. Through the development of its comprehensive academic achievement goals and strong plan for assessments and data-driven instruction, the review committee determined these were additional pieces of evidence in support of the rubric's criteria.

Furthermore, the review committee found evidence in CPS's academic plan in support of the rubric's criteria which states that the applicant shall have "existing community partnerships that will benefit students and families". CEG currently operates three (3) turnaround schools in different neighborhoods of Memphis and, over the last eight (8) years, has developed solid partnerships with community organizations that benefit its students. While the application did not include letters of support from community organizations, the applicant named several community partners in the capacity interview and described the letters of support they have received since the submission of the application from existing organizations such as Memphis Connect, Community in Schools, Memphis Teacher Residency, and Le Bonheur Children's Hospital. During the capacity interview, the applicant also shared a lesson learned through experience about building relationships with community organizations. According to the Executive Director, the most effective partnerships are built between the school leader and the community. As such, since the submission of the application, the applicant hired its school leader for CPS and tasked that leader with reaching out to community organizations and churches that serve the school's proposed neighborhood and building relationships with the community leaders who are deeply connected to the families. During the capacity interview, the school leader described the work she has already done on this front and named several other community organizations that she intends to connect with to build partnerships. The applicant's dedication to serving its community is evidenced by its existing relationships and willingness to hire a school leader ahead of an approval for the school to begin building upon existing relationships and developing new partnerships within its proposed community.

In totality, the review committee found clear evidence that the applicant's academic plan meets or exceeds the standard for approval.

Analysis of the Operations Plan and Capacity

Rating: Meets or Exceeds Standard

Strengths Identified by the Committee:

The applicant's Operations Plan and Capacity meets or exceeds standard because the applicant is an experienced operator with clear plans and contingencies for all major operational components of the school, including a start-up plan with specific tasks and responsibilities outlined, a process for securing a facility, and a proposal to alter its transportation plan based on the needs of its families. In addition, the applicant has a strong leadership team in place with the capacity to provide key supports for its staff members, including on-going professional development and the creation of a new network-level role specifically focused on supporting school leaders.

With eight (8) years of experience and three (3) charter schools currently in operation in the Memphis area, CEG has the knowledge and capacity to plan and execute a high-quality operations plan. The applicant's start-up plan laid out the necessary tasks and a reasonable timeline that stretched across Year 0, including the specific staff members responsible for each task and enough flexibility within the plan to allow for the applicant to go through the State Board's appeal process and still be on track to open by August 2021. Similarly, the applicant's start-up budget was aligned with its start-up plan, based in its operating experience, and included \$50,000 in contingency funding, should there be any unforeseen expenses. During the capacity interview, the review committee asked about the capacity of the network-level staff members assigned to the start-up year's tasks and their ability to focus on opening a new school without draining resources from its operating schools. In response, the applicant spoke to its history of opening schools, its track-record of successfully executing a start-up plan while simultaneously seeing growth at its existing schools, the early hiring of a school leader, and a plan to gradually release responsibilities to the school-level leaders as the school prepares to open.

In addition to a comprehensive start-up plan, the applicant provided a clear pathway for securing a facility and a proposal to adjust its transportation plan based on the needs of its families. While the application did not include many potential facilities, during the capacity interview, the executive director explicitly described the top three (3) potential facilities as well as several others that could serve as a contingency option, if needed. The executive director also explained that they had designed their facilities timeline with the assumption that they would need to go through the State Board's appeal process, thus requiring a delayed start. The executive director further explained that the network and governing board was comfortable with the delayed timeline, had experience working within these constraints, and was financially prepared for any unforeseen issues that may arise.

With regard to transportation, the amended application stated that CPS would not provide transportation. Nevertheless, the applicant provided a proposal for a transportation plan within the application. When asked about the conflicting transportation details during the capacity interview, the applicant explained that they had not yet determined a need for transportation but included a plan anyway. The applicant shared that the need for transportation would be determined based on the location of the facility, the proximity of their proposed students to the facility, and the results of a survey regarding transportation needs provided to families during the spring application period. The applicant described how they currently oversee transportation at their existing schools and who on their team is responsible



for managing their transportation needs. Furthermore, the applicant provided evidence of their ability to cover any transportation costs through the use of their \$5 million in operating reserves and \$1 million in cash.

Finally, through the application and capacity interview, the applicant successfully demonstrated the strength of their leadership team and their ability to provide key supports to staff members across each of their existing campuses. First, the applicant provided a comprehensive plan for on-going professional development, including a four-week onboarding of new teachers over the summer as well as dedicated time for weekly professional development. While the application provided limited details about the plan to provide professional development and supports to their special populations teachers, specifically special education and EL, the applicant clarified this plan during the capacity interview and shared how their network-level special populations staff members collaborate with the school-level special populations teams. Further, the applicant was candid about the operational challenges they had experienced at their existing schools and explained how these challenges led to the recent hiring of a network-level leader specifically focused on managing principals. Since submitting their application earlier this year, the sponsor has hired a school leader for CPS and started that leader with extensive coaching from the new network-level leader this summer. As a result, the applicant expressed how much more prepared their school leader is through the intentional addition of this new support role.

Together, the review committee found significant evidence that the operations plan meets or exceeds the standard for approval.

Analysis of the Financial Plan and Capacity

Rating: Meets or Exceeds Standard

Strengths Identified by the Committee:

The applicant's Financial Plan and Capacity meets or exceeds the standard because of their reasonable and realistic operating budgets, the network's strong financial health, and sound contingency plans to meet financial needs if anticipated revenues are lower than estimated.

As presented in the application, the budget contains reasonable assumptions and budget numbers that reflect all operating costs including staffing, contracting, and insurance. The applicant provided detailed financial procedures for the school and at the network-level with a budget narrative that clearly aligned with the budget worksheet. The school's per-pupil funding projections were reasonable and based on historical data, and the sponsor projects that, through the financial support of the network, the school will operate with a positive ending fund balance each year beginning in Year 0. Additionally, the applicant provided a complete, realistic, and viable budget for the network with reasonable and well supported cost assumptions including grant and fundraising sources.

CEG is an experienced operator in strong financial health, operating three (3) schools with a positive cash flow. The network has more than \$5 million in operating reserves along with \$1 million in cash available for the school that could be used to offset any revenue shortfall during the pre-opening or the first two (2) years of operation. Additionally, the network's Executive Director and Governing Board bring extensive expertise in fiscal management and have a track record of positive cash flow and clean audits to testify to the strength of the organization.

Furthermore, the applicant demonstrated sound contingency plans should its revenue sources be lower than estimated. The application described how CPS will not be responsible for many potential costs associated with opening a fourth school because they are absorbed by their network office. Similarly, the applicant created a conservative budget that does not include any grant funding and included contingency funds in its start-up and operating budgets. In totality, the review committee identified significant evidence that the applicant's financial plan meets or exceeds the standard.

Analysis of the Portfolio Review/Performance Record

Rating: *Partially Meets Standard*

Weaknesses Identified by the Committee:

The applicant’s Portfolio Review and Performance Record partially meets standard because of a lack of sufficient evidence that the operator’s schools are meeting state achievement standards, as required by the rubric. While the review committee acknowledges the continuous growth the network is making collectively, the applicant was unable to present ample evidence of successful outcomes against state standards for all schools due to their lack of absolute achievement on the TN Ready assessment.

The applicant operates three (3) turnaround schools authorized by the Achievement School District (ASD) and provided evidence that their schools have been continuously meeting their growth targets, as measured by the NWEA MAP assessment and TVAAS. While there is sufficient evidence that CEG has and continues to accomplish growth, the absolute achievement remains low, and the rubric does not provide any differentiation for measuring the academic success of an operator running turnaround charter schools, which CEG does. According to the rubric, the applicant shall provide “evidence that the operator’s schools are high performing and successful by meeting state standards”; CEG’s evidence of this is limited. Admittedly, Cornerstone Prep Denver Campus and Lester Prep have experienced consecutive years of TVAAS Level 5 scores, though growth is not the only measure of success included in the rubric. The table below provides details on how each of CEG’s schools performed on the TN Ready assessment in the 2018-19 school year.⁹

TN Ready Assessment Data, 2018-19			
CEG School	ELA (% on track or mastered)	Math (% on track or mastered)	Overall TVAAS Composite
Lester Prep	6.7%	16.7	Level 5
Cornerstone Prep Lester Campus	9%	11.6%	Level 2
Cornerstone Prep Denver Campus	10%	27.1%	Level 5

While the network’s most recent TN Ready results earned them the recognition for being the highest performing school in the ASD and resulted in moving its remaining school off the Priority School List, there is insufficient evidence that the network’s growth data has translated into high performing schools. The applicant acknowledged their achievement deficits as compared to Shelby County Schools during the capacity interview and emphasized the adjustments and progress they have made. Additionally, the applicant provided data demonstrating how its schools are performing, on average, at the same level or better than the schools within its proposed community. In considering all of the data, the review committee acknowledges the hard work that is required in a turnaround school and commends the network for their positive trajectory. If the rubric provided clarity on how to differentiate the performance of a turnaround charter school with that of a traditional new start charter school, it is

⁹ There is no academic data available for the 2019-20 school year due to the public health emergency and subsequent cancellation of state testing.



possible that the review committee could have rated this section as meets or exceeds standard rather than partially meets standard. However, in its current form, the rubric is silent on this differentiation, and, therefore, the review committee had insufficient evidence that the network's growth data and positive movement is satisfactory in demonstrating that the schools are high performing schools by meeting state standards.



Evaluation Team

Lisa Baldwin serves as an Assistant Professor of Practice for second year graduate students at the Relay Graduate School of Education, Memphis Campus. In this role, Lisa has spearheaded the charge and creation of a targeted academic support program for her campus' graduate students. Currently, she also manages and develops graduate teaching assistants. In addition to her work at Relay Graduate School of Education, Lisa previously served as Post Residency Director and Instructional Coach at Memphis Teacher Residency. Prior to her role at Memphis Teacher Residency, Lisa worked as an elementary school teacher for two years in the former Memphis City Schools district. From there, she taught eight years at St. George's Independent Schools – Memphis Campus. While at St. George's, Lisa served two years as a founding mentor teacher for Memphis Teacher Residency and as the campus' upper elementary department head. Lisa earned a Bachelor of Business Administration degree in Marketing from Memphis State University and a Master of Arts in Teaching degree from the University of Memphis. Lisa is continuing her education at Grand Canyon University as a candidate for a Doctorate of Philosophy in General Psychology with an Emphasis in Cognition and Instruction.

Michelle Doane is an independent educational and nonprofit consultant based in Nashville, Tennessee. Her primary areas of specialization include program development and evaluation, charter school development, charter school authorization, school and authorizer quality, strategic planning, and project management. Recent clients include the Walton Family Foundation, the Maryland State Department of Education, the Louisiana Department of Education, and the Indiana Department of Education. Michelle previously served as the Project Manager in the Vice Chancellor's Office for Equity, Diversity, and Inclusion at Vanderbilt University, and as the Director of School Development Programs at the Tennessee Charter School Center. She holds a Master of Education degree in learning and instruction from Peabody College, Vanderbilt University.

Ali Gaffey serves as the Deputy Director of Charter Schools for the Tennessee State Board of Education. In this role, she oversees the charter school appeals process and authorizer responsibilities of the State Board. Prior to joining the State Board, Ali was the 7th and 8th grade Academic Dean at STEM Prep Academy, a charter school serving a largely immigrant population in Southeast Nashville. Ali is a former middle and high school English teacher and a Teach For America alum with a decade of experience in Education. Ali has taught in and led charter schools in Nashville and New Orleans and loves the innovation and quality education opportunities charter schools provide. Ali earned her Bachelor of Arts degree at the University of Florida, is a 2014 Leading Educators alum, and a current participant in LEAD Tennessee.

Dr. Diarese George is the founder and Executive Director of the Tennessee Educators of Color Alliance (TECA), a nonprofit aimed at supporting educators of color across the state. Previously, he taught for five years as a high school teacher, with a focus on business. Afterwards, he worked as Director of Recruitment for the Nashville Teacher Residency. Additionally, he has completed education leadership fellowships for Education Pioneers, the State Collaborative on Reforming Education (SCORE), Hope Street Group, and the Mosaic Fellowship, which connects and empowers education leaders of color across the state of



Tennessee. Dr. George holds a Bachelor degree in Business Administration, Master degrees in Corporation Communications and Business Administration, and a Doctorate in Education Leadership.

Andrew Sullivan grew up in Minneapolis and graduated from Yale University in 2005 with a Bachelor of Arts degree in History, as well as coursework in the Yale Teacher Preparation Program. He became a 4th grade teacher in San Jose, California through Teach For America and, after two years, moved to New Orleans as a founding teacher at Langston Hughes Academy (LHA), where he taught 4th grade reading and 7th grade social studies. He eventually became an Assistant Principal at LHA, before moving to Samuel J. Green Charter School as the Assistant Principal and then Principal of the middle school. After ten years working in schools, Andrew went back to school himself, completing a Master of Education degree in Education Policy and Management from the Harvard Graduate School of Education. Following graduation, Andrew moved to Denver as a part of the Urban Leaders Fellowship, working on policy issues related to workforce development. He subsequently worked with Empower Schools, supporting the Luminary Learning Network in its first year of operation and participating on the School Improvement Spoke Committee for the state's ESSA plan. In his spare time, he worked as the Policy Director for State Representative James Coleman (HD-7) during the 2017 legislative session. After working as the Education Policy Director for the Denver Mayor's Office of Children's Affairs, Andrew returned to New Orleans to work as Chief of Staff for Councilmember Kristin Gisleson Palmer.

Teneicesia White is in her sixth year with Aurora Collegiate Academy, currently serving in her fourth year as the instructional leader. Aurora Collegiate Academy is a tuition-free public elementary school serving students in grades Kindergarten through Fifth grade in Northeast Memphis. Previously, Teneicesia served at the Dean of Students at Aurora. A former social studies teacher and district instructional coach for Memphis City and Shelby County schools, she holds a Bachelor of Arts degree from the University of Memphis, a Master of Education degree from Union University, and an Educational Specialist degree from Cambridge College. She is a wife, mother, and woman of Alpha Kappa Alpha Sorority, Incorporated.

EXHIBIT B



TENNESSEE CHARTER SCHOOL APPLICATION EVALUATION

Ratings and Criteria

State law requires the Tennessee Department of Education to provide “a standard application format,” T.C.A. 49-13-116, and “sample scoring criteria addressing the elements of the charter school application specified in the Tennessee Public Charter Schools Act of 2002,” SBE Rule 0520-14-01-.01(2).

Evaluators will use the following criteria to rate applications. Within each subsection, specific criteria define the expectations for a well thought out response that “Meets the Standard.” Evaluators will rate the responses by applying the following guidance:

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

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.

Recommendations for approval or denial will be based on the written application (narrative and attachments), independent due diligence, and, if offered by the authorizer, applicant interviews.

Applications that do not meet or exceed the standard in all sections (academic plan, operations plan, financial plan, and, if applicable, past performance), as evidenced by the summary review ratings, and applications that do not meet or exceed any additional LEA requirements will be deemed not ready for approval. Tennessee law states, “The approval by the chartering authority of a public charter school application shall be in the form of a written agreement signed by the sponsor and the chartering authority, which shall be binding upon the governing body of the public charter school. The charter agreement . . . shall be in writing and contain all components of the application.” T.C.A. § 49-13-110(a). Thus, an initial or amended charter application, to be approved, must be ready to be incorporated into a charter agreement.

APPLICANT TYPE	DESCRIPTION	REQUIRED SECTIONS
New-Start Applicant	Operator with no existing schools	<ul style="list-style-type: none"> • Academic Plan Design and Capacity: 1.1 through 1.12 • Operations Plan and Capacity: 2.1 through 2.10 • Financial Plan and Capacity: 3.1 and 3.2
Existing Tennessee operator proposing new focus/grade structure OR Existing non-Tennessee operator OR Existing ASD operator to a non-ASD authorizer	Operator with existing schools in Tennessee proposing to change their focus and/or grade structure OR Operator with existing schools outside of Tennessee OR ASD Operator with existing schools in Tennessee proposing to another non -ASD authorizer	<ul style="list-style-type: none"> • Academic Plan Design and Capacity: 1.1 through 1.14 • Operations Plan and Capacity: 2.1 through 2.16 • Financial Plan and Capacity: 3.1 through 3.3 • Portfolio Review and Performance Record: 4.1
Existing Tennessee Operator Proposing Exact Focus/Grade Structure	Operator with existing schools in Tennessee proposing no change in focus or grade structure to a currently operating school	<ul style="list-style-type: none"> • Submit original application • Academic Plan Design and Capacity: 1.2, 1.12, 1.13, and 1.14 • Operations Plan and Capacity: 2.11. through 2.16 • Financial Plan and Capacity: 3.4 • Portfolio Review and Performance Record: 4.1

Evaluator Name: Shelby County Schools Evaluation Team

Proposed School Name: Cornerstone Prep School

Application includes an Executive Summary

Yes

No

Application Review Team:

<u>Reviewer</u>	<u>Department</u>
LaTricea Adams (Lead)	Charter Schools
Joshua Perkins (Lead)	Charter Schools
David Wilkins	Mental Health
LaTonya Goodman	Finance
Rhonda Hill	Student Support
Ivory Stewart	Exceptional Children
Arby Martin	Professional Development
Ezra Howard	English Language Learners
Jack Vuylsteke	Charter Leader
Suzanne Shovlin	Curriculum & Instruction
Tamara Lumpkin	Expert Reviewer
Audra Block	Community Stakeholder/Parent
Brittany Monda	Charter Schools
Tonye Smith McBride	Strategy and Performance Management

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.1 SCHOOL MISSION AND GOALS		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ The mission statement defines the purpose of the proposed charter school. ▪ The mission statement is clear, concise, compelling and measurable. ▪ The vision provides a coherent description of what the school will look like when it is achieving its mission. ▪ Goals are aligned to both the mission and vision and critical to the school's success. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
The applicant demonstrates a Mission and Vision that aligns with the goals of the school.		pp.10
The mission statement defines the purpose of the proposed charter school and is clear and concise. Additionally, it lends itself to measurable actions to determine if the mission will be fulfilled. Likewise, the vision provides a coherent description of what the school will look like once the mission is achieved.		pp.10
The applicant connects Destination 2025 as a focus area, Ready to Read by 2025.		pp. 13
Concerns/Questions		Page
The operator chooses the words “wisdom” and “knowledge” to define CEG/Cornerstone’s primary drivers to student success in college and community; inclusion in the mission statement generally means that each word means something foundational to the overall school. What is CEG’s difference between these terms such that they should both be part of its mission?		pp.10
The operator defines vision through its goals and how those goals will be measured, primarily through metrics such as assessments, trackers and surveys which produce objective data; in this section, the school is not described in a holistic manner that demonstrates how the school, even in brief form, will meet these goals. The operator should be clearer on the metrics used to define if it is supporting its mission.		pp. 10-11
When prompted to provide a narrative/description of the school’s model to align with goals, values and priorities, the operator provides a short list of bullet points that again sound more like end goals, still lacking compelling or dynamic plans, methods, or strategies that can be reviewed. What does this school look like or sound like in pursuit of that goal; how does it create that or intervene upon it when it is absent?		pp. 14
Applicant states “TN Ready provides one final assessment of students at year end. CPS expects that Year 1 will create a baseline and Year 2 scores will exceed the Annual Measurable Objective (AMO)” If applicant is starting the school with grade K and building up, there will be no AMO based off of TN Ready until Year 4. What is the school’s plans measured achievement in years 1, and how will AMO be determined after year one?		pp.11
Applicant should list all schools they are referencing in the area by name. Attachment E provides no proof of support from any of the listed community partners from the proposed neighborhood.		pp. 12
On page 11, CEG noted that they are seeking to close to achievement gap and also that they have a proven track record. With what methods has the applicant been successful previously?		pp. 11
How does the MAP assessment align to the achievement gap and TN State Standards?		pp. 12
In referencing the third stated goal the description is quite vague and only references replicating “innovative best practice from schools across the nation.” What specifically are some of these innovative best practices? In priority 1		pp. 10

as well as priority 2, the nature of supports in both early literacy and college readiness is vague. What supports exactly? Intervention programs? Etc.?		
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
The application includes the proposed tools (assessments) to measure academic progress in alignment to the stated mission and vision.		p. 4
Concerns/Questions		Page
While the application includes a breakdown of how “knowledge” and “wisdom” are defined in the mission and vision statement, it is not compelling.		p. 4
The applicant states “Research indicates that performing at grade level represents the best elementary and middle school measure of future success in college.”; however, there is no source or citation of any specific research. What is the origin of the “research”?		p. 5
The application provides descriptions of what assessments will be used to monitor progress toward academic goals; however, there is a lack of clarity surrounding “how” and what specific actions the proposed school will take to execute actions to achieve the stated mission and vision.		pp. 5-6
The application references past success with TVAAS performance for Lester Prep for the 2019-20 academic school year; however, there was no administration of TNReady for the 2019-20 academic school year.		p. 6
The application does not include clear evidence of the specific strategies used for historical success. A “CEG Blueprint” is referenced, but the application does not explicitly demonstrate what and how aspects of the “CEG Blueprint” were implemented.		p. 6
There is no parenthetical citation to support the following statement regarding alignment between NWEA MAP and TNReady: <i>“NWEA’s study indicates that MAP also provides a strong correlation and alignment to TN standards and TN Ready. The research states “By using matched score data from a sample of Tennessee students, the study demonstrates that MAP Growth scores can predict whether a student will reach proficiency on the TNReady assessments based on his or her MAP Growth scores, as shown by the classification accuracy results.”</i>		p. 6
The data provided to describe academic performance in the target area is vague. For example, the application states: “Parkway Village has multiple schools on the 2018 Priority School List.” What are the “multiple schools”?		p. 7

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.2 ENROLLMENT SUMMARY		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ A clear description of the community where school intends to draw students including school zones and academic performance of surrounding schools. ▪ Rationale for selecting the community where school will locate and description of how the school will serve as a needed alternative. ▪ Completed enrollment summary and anticipated demographics charts with reasonable enrollment projections. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
The applicant describes the rationale for selecting this community.		pp. 16
The applicant provides a solid description of the community where the school intends to locate and draw students to their school.		pp. 15-18
Concerns/Questions		Page
How does describing the genesis of the community’s street names support this operator’s demonstration of community knowledge?		pp. 19
School focuses its comparative analysis on Sherwood Elementary and Middle and provides generalizations about the schools within the Parkway Village neighborhood. The school’s comparative analysis lacks specifics and should identify all schools in proposed neighborhoods.		pp. 16
Stating a 25% “Other” population is incomplete; has the operator done enough research into community’s growth and evolution over time to effectively list and plan for what populations will be included besides African American, proportionate to both Memphis’ and the community’s growing diversity? Will plans be in place to serve these populations should they represent this percentage or perhaps even more than 25% of the school’s population? Operator says Binghampton and Frayser has demographic data consistent with target demographic but has not provided the demographic data for any of the proposed school’s target areas to be able to verify the claim. Answers speak in vague generalities of “reflecting the demographics of the neighborhood.” This needs clarity, specifically for knowing the needs of the students, and should include terms of high need and specialized instruction (e.g. language learners and exceptional education).		pp. 18
Operator claims to provide “best practices from the highest performing schools around the country” including “more time on task for the core subjects of math, ELA, science and social studies”; however, in the materials included, there is no evidence of science and social studies grades K-2, and no evidence in social studies taught in grades 3-5.		pp. 17
Applicant does not explain how ASD and SCS requirements are different and what plans are in place to alter its current practice to align with SCS requirements.		pp. 18
Upon enrollment, how will CEG access/identify students who either need or already have special educations services?		pp. 17
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Applicant added some school specific information within the neighborhood.		p. 12
Candidate included information about the identification process for special education services,		p.13

Concerns/Questions	Page
<p>The context surrounding street names and general statements surrounding economic challenges post the Great Recession does not reveal compelling rationale of where the school intends to serve. The added information is not compelling around their intention to serve in the neighborhood,</p>	p. 10
<p>The application mentions: “vital community insight” however the data/description only provides demographic information and does not reflect qualitative data truly representative of the actual insight of the community.</p>	p. 10
<p>The information the application includes surrounding similarities between the proposed target location and the Frayser and Binghampton communities do not take authentic, community-based and neighborhood specific historical context into consideration which raises a red flag regarding the proposed operator’s familiarity with the community they plan to serve. Additionally, although there is comparative information, the application doesn’t focus on demographics from an academic context.</p>	p. 13

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.3 ACADEMIC FOCUS AND PLAN		
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> ▪ A clear and comprehensive explanation of the school's academic focus that is aligned with the school's mission and vision. ▪ A framework for a rigorous research based academic plan that reflects the needs of the targeted student population and is aligned with the school's stated mission and vision. ▪ A robust and quality curriculum overview, supported by research, with a plan for implementation that includes all grades the school will eventually include. ▪ Evidence the curriculum design is aligned with the Tennessee State Standards. ▪ Evidence the proposed academic plan will be appropriate and effective for growing all students while at the same time closing achievement gaps. ▪ A description of effective methods for providing differentiated instruction to meet the needs of all students, including a strong plan for Response to Instruction and Intervention (RTI²) that aligns with Tennessee guidelines. ▪ If including blended learning, a clear explanation of the model the school will use and the role of teachers within the blended learning environment. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
Strengths		Page
<p>The proposed school's academic focus will be college preparation, and the described academic plan aligns. The plan is realistic in addressing some of the academic challenges that are likely to be present with students when they enroll yet includes plans and goals for students to be high performing.</p>		pp.19-34
<p>The chosen curricula currently align with the state standards.</p>		pp.43
<p>There is evidence for clear planning with regards to the ELA academic design and implementation, outlining specific aspects in all grades. There is evidence of scaffolds and supports embedded into the ELA instructional practice appropriate for ELLs (anchor charts, word walls, etc.).</p>		pp. 20-28
<p>The curriculum in the academic plan is generally outlined in a timeline. There are some with vague areas that need clarity, though it does mention pre-designed curriculum maps, unit plans, and individual lesson plans though in passing (see below).</p>		pp. 39 -42
<p>A timeline for instruction practice provides evidence of a planned roll-out of instructional goals practices College preparatory focus is met with specific elements that demonstrate adequate thematic alignment as well as concrete focus on students making measurable student growth on the path of college readiness</p>		pp. 19-42
<p>Section C demonstrates strong and variant methods informed by popular research methods that push for student engagement that can be cross-applicable across all courses and seem sustainable and aligned to academic plan,</p>		pp. 35- 36
Concerns/Questions		Page
<p>There are several references to a CEG blueprint for clarity, where is this blueprint and what does it outline? How and in what ways does it support instruction and the aims of the school?</p>		pp. 19
<p>Clarity is needed for curricular choices. The CEG blueprint is mentioned as the academic implementation for K-2 ELA, but CKLA is referenced on pages 20, 21, and 22. What are the criterion for choosing or changing curriculums?</p>		pp.19-22
<p>The distinction between upper elementary and middle school curriculum and instruction is not clear in either ELA or Math. For example, in Math (28) it begins with discussing making the transition to high school level math with algebra and geometry, which would be appropriate for middle school but then moves into a CRA (Concrete, representational, abstract) model which appears much more appropriate for elementary grades. There isn't clarity in structure of this</p>		pp. 28-32

<p>section of the application which leave confusion on scope and sequence for the 3-8 grade levels, where the standard can be very different. This is also similar for science.</p>		
<p>3-8 Science standards passed in 2016, yet curriculum is being revamped. What is the current development for science curriculum in 2020?</p>		pp. 31,32
<p>3-8 Social Studies. Provides a description of for 6th grade as well as 8th grade. What are the defining characteristics of content, material and instructional strategies for the other grades?</p>		pp. 32-34
<p>Provides details on RTI but lacks information on instructional strategies, supports, accommodation, scaffolds, etc. specific to special populations for all content areas for grades 3-8. What are the details on content specific support that is grade level appropriate for English Language Learners and Students with Disabilities?</p>		pp. 34-38
<p>It states that CEG also serves a considerable amount of SWD and ESL students, yet specific interventions are not mentioned in the academic plan, what academic supports are in place for these students?</p>		pp. 36
<p>The applicant mentions a class on character development that all students will receive. The applicant needs to clarify the content and how it supports the overall academic plan, its goals, and the educational mission of the school? (38)</p>		pp. 38
<p>The timeline for instructional goals includes many undefined acronyms. The applicant should define the terms for a full understanding.</p>		pp. 39
<p>All middle school students are required to take a computer science course aligned with computer literacy. What are the components of this course? How does it move beyond basic computer literacy for high level instruction in technology and support?</p>		pp. 43
<p>Samples of core techniques would be useful, especially if the school is modeling its academic program off of a currently existing model; e.g., the companion guide for the literacy program’s auditory component or during-instruction note taking templates in 3-8 science seems like the most critical tool for measuring the program element’s effectiveness; if this is already an academic system in place at operator’s other schools, attaching and referencing these documents would provide context for the evaluation of this and other named academic systems.</p>		pp. 21
<p>Unclear how many of operator’s academic protocols are research-based or derivative of external/industry standard best practices versus how many are self-created. Some practices are to be executed using off shelf resources, such as Engage NY (24) but understanding the development of other critical materials and who will be responsible for them is unclear. Additionally, what elements are developed versus what will be executed from an external source needs clarity because there is variety of curricula mentioned (24-25)</p>		pp. 24-25
<p>Spiraling plan included to address how the academic plan will close achievement gaps for all students is thin. The applicant only outlines how the RTI process will be used to addressed Tier 3 interventions. Little information is revealed on how gaps experienced by Tier 1 & 2 students will be addressed.</p>		pp. 43 -44
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
<p>Applicant stated that the Sanford Harmony curriculum will be used for character development.</p>		p. 32
<p>Applicant includes additional details about 3-8 science, 3-8 social studies, and computer science as noted in initial feedback.</p>		p. 28-31

Concerns/Questions	Page
<p>In the full outline of the proposed curriculum, there is little to no explanation of how the curriculum will be accessible to special populations (e.g. SPED and ELL).</p>	pp. 16-37
<p>While specific aspects of the content of the curriculum across all content areas are included, there is insufficient evidence that demonstrates how the generic curriculum selection will be modified and tailored to the specific needs of students who may be in need of alternative approaches.</p>	pp. 16-37
<p>There is no evidence within the comprehensive academic plan in this section that demonstrates how the achievement gap will be address. For example, the curriculum for core subject areas are written with the expectation that student may not have learning gaps.</p>	pp. 16-37

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.4 ACADEMIC PERFORMANCE STANDARDS		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Academic achievement goals are rigorous, measurable, and realistic and set high standards and high expectations for student learning. ▪ Academic goals contribute to the stated mission and vision of the school. ▪ Clear and compelling process for setting, monitoring, and / or revising academic achievement goals. ▪ Evidence of clear, rigorous promotion/retention and exit policies and standards. ▪ Appropriate, well-defined corrective action plan if school falls below state and/or district academic achievement expectations. ▪ A clear description of the school's approach to help remediate students' academic underperformance based on assessment and other data, and evidence the chosen approach will result in improved academic achievement. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standards	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Appropriate, defined corrective action plan if school falls below state and/or district academic achievement expectations.		pp. 46-47
A clear description of the school's approach to help remediate students' academic underperformance based on assessment and other data.		pp. 46-47
The amount, type, and range of the goals included in this section is strong and generally seems achievable; if achieved, operator's school would be on track to its mission of college preparation (46)		pp. 46
Concerns/Questions		Page
How will WIDA be analyzed and monitored for language development of ELLs?		pp. 46
In cases of corrective action, it mentions that CEG will make "identify which part of the blueprint is not being executed effectively." Given that the blueprint is not provided, how will CEG analyze aspects that are not being effectively implemented?		pp. 46,47
The applicant includes, promotion decisions that are reliant upon "other measures" that are not defined The applicant should expound on their answer and provide clarity.		pp.48
The applicant's description of their promotion and retention policies is thin. More detail is needed to discuss their academic interventions as exit criteria.		pp.48-49
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Application includes corrective action plan focused on teacher development.		p. 48
Concerns/Questions		Page
The application does not include rigorous, measurable, and realistic goal nor quality expectations for ELL students, including exit strategies for ELL students. There is some language used that raises concerns with the applicants knowledge about the WIDA Assessment.		pp. 47-48
Although the applicant includes additional information about promotion and retention, there is not a clear description of the school's approach to help remediate students' academic underperformance		pp. 49-50

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.5 PHASE-IN/TURNAROUND – IF APPLICABLE		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Inclusion of strong prior experience in turning around or converting an underperforming school or plan for doing so if the organization does not have prior experience. ▪ A clear explanation for how the organization will engage with the neighborhood, community, and student population prior to conversion. ▪ Specific ways to engage and transform the existing school culture and how the organization will determine what aspects of school culture to keep, modify, or add. ▪ If proposing a phase-in approach, the organization clearly describes how transition to a shared campus will occur with regard to campus collaboration and building-wide issues. ▪ If proposing a full school take-over approach, the organization has a clear plan for communicating with existing staff and a comprehensive plan for needed additional support to ensure student success. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
N/A		
Concerns/Questions		Page
N/A		
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
N/A		
Concerns/Questions		Page
N/A		

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.6 HIGH SCHOOL GRADUATION STANDARDS – IF APPLICABLE		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Plan for meeting the Tennessee Graduation Requirements (including credits, transcripts, electives, GPA calculation) and compelling explanation of any additional requirements beyond the State’s requirements. ▪ Clear, persuasive explanation of how the school’s graduation requirements will ensure student readiness for college or other postsecondary opportunities, including trade school, military service, or entering the workforce). ▪ Effective systems and structures for students at risk of dropping out or not meeting graduation requirements. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
N/A		
Concerns/Questions		Page
N/A		
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
N/A		
Concerns/Questions		Page
N/A		

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.7 ASSESSMENTS		
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> ▪ Assessment selection will provide sufficiently rich data for evaluation of the academic program and align with state standards. ▪ Assessment plan details the collection and analysis of individual students, student cohorts, and school level performance throughout the school year, at the end of the academic year and for the term of the charter. ▪ A process for using data to support instruction is clearly articulated, with detailed plans presented to provide adequate training for teachers and school leaders. ▪ An explanation of how the organization will use data to inform instruction and evaluate academic progress for at-risk students, students with disabilities and English Language Learners. ▪ Demonstrates an understating of the obligation under state law to participate in the statewide system of assessments and accountability. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
<p>A thoughtful plan is described that outlines assessments, data collection and analysis for individual students, student cohorts, and school level performance at appropriate intervals throughout the school year. Appropriate personnel have been identified to address the various aspects of assessing student performance.</p>		pp. 52,53
<p>There is a clear plan for weekly data meetings, formative assessments via MAP, and summative yearly analysis. There is evidence that data analysis will assist in driving choices on instructional practices.</p>		pp. 52
<p>School’s assessment structures follow a normative and well-established track from daily formative to mid unit formative to summative, complemented by interim assessments at quarterly intervals; this assessment pattern is sustainable and will produce strong data profiles for the school to use strategically. There is a clear description of how data will be used to inform instruction.</p>		pp. 51-53
Concerns/Questions		Page
<p>Interim Assessments are identified through exit tickets and other daily teacher routines. They list NWEA and IReady in the academic progress part B section, but they do not list any verified systems for interim assessments in section A. What systems are being used to gauge success?</p>		pp. 52-53
<p>Please describe how the CEG Interim Assessments have been validated to ensure alignment with TN State Standards</p>		pp. 52
<p>On page 52, it mentions educators will create the SWYK quizzes using the approved network item bank. How will the administration ensure rigorous, aligned assessments are created and utilized by educators?</p>		pp. 52-53
<p>During formative assessments, how will validity and accommodations/ modifications be ensured with subgroups of students, e.g. those in special education and English language learners?</p>		pp. 54
<p>What specific assessments will be provided to assess language development either formatively or summative for English language learners?</p>		pp. 56
<p>The applicant states “CEG will equip school leaders with tools to lead a data meeting...” what are these tools and how will they support leaders in data meetings?</p>		pp. 52, 56
<p>There is a robust assessment base that the school will administer. With up to 5 different types of assessments with multiple rounds. How will these be executed with fidelity and ensuring that data is purposeful from the collection from each assessment?</p>		pp. 53

<p>Applicant claims there will be assessments aligned with TN academic standards and in the core content areas, but Science/Social Studies not taught in K-2 despite there being standards for those grades.</p>		pp. 56
<p>What will summer leadership training look like in the first year when there is no prior data to study? Are school leaders the only individuals that will review data from assessments?</p>		pp. 52
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
<p>The application includes multiple assessments to assess student learning.</p>		pp. 54-55
<p>Applicant includes a breakdown of the role school leadership will play in assessing assessment quality.</p>		p. 56
Concerns/Questions		Page
<p>Applicant refers to “high confidence and correlation level” in discussion of the interim assessments use because of the eight years of this process. Applicant could expound around the data correlations to success of their processes.</p>		p. 54
<p>There is a lack of clarity surrounding what criteria, vetting process, and procedure “CEG leadership” will use to determine if the “Show What You Know” (SWYK) assessments are aligned to TNReady. The same concern applies to the proposed Director of SPED and ELL Lead who are anticipated to review assessments.</p>		p. 54
<p>The application does not reference special populations’ IEPs or ILPs when determining what (or if) modifications should be made for assessments. In addition, it is unclear what types of formative assessments will be used (as WIDA is not a formative assessment) to assess language proficiency progress for English Language Learners.</p>		p. 54

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.8 SCHOOL CALENDAR AND SCHEDULE		
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> ▪ School calendar (Attachment A) and student schedules meet Tennessee minimum requirements of the equivalent of 180 days of instruction. ▪ Calendar and schedule support implementation of the academic plan and align with stated mission and vision. ▪ Attendance goals are clearly outlined. ▪ Description of a typical day for teachers and students align with key priorities of the academic plan and the overall mission and vision for the school. ▪ If proposing Saturday School, summer school, or after school programming, a description of programming is included 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
<p>The school calendar meets the requirements for a school year, see Attachment A. To help parents who may have other children at SCS schools, most of the academic calendar is modeled after Shelby County School’s traditional school year calendar.</p>		pp. 57
<p>CEG provides a general breakdown of content instruction throughout the day.</p>		pp. 57
<p>CEG provides a general breakdown of when school begins and ends with a different schedule on Friday for professional development.</p>		pp. 57,58
<p>Heavy emphasis on early (before SY) and frequent professional development opportunities allows for the program’s intensity and nuance to be made possible by staff</p>		pp. 57
<p>Student narrative shows an experience that aligns well to the school’s mission academically, maximizing instructional minutes and developing independent responsibility</p>		pp. 58
Concerns/Questions		Page
<p>The applicant doesn’t make clear the various aspects of a teacher’s typical school day, especially planning periods and the end of the school day.</p>		pp. 58-60
<p>CEG provides a general breakdown of instructional time during the day. Specifically, how will this differ for the specific grade-bands? How will phase-in affect changes in the schedule as the school grows in?</p>		pp. 57,58
<p>Attendance goals were not outlined in this section.</p>		Varies
<p>Section shows instructional minutes only. The application should expound upon the schedule and include other aspects to the schedule, so the full school day is included.</p>		pp. 57,58
<p>Section A says three weeks of staff professional development. However, later sections have three weeks for new teachers and two weeks for veteran teachers. What is the summer professional development schedule for staff and leaders?</p>		pp. 57
<p>Minutes discussed in the instructional minutes section do not match the student narrative. Additionally, elective courses are not included in the times provided.</p>		pp. 57-58
<p>The applicant indicated that tutoring will be “offered” to all students; however, there is no discussion of how the school will eliminate barriers that may prevent students from attending. Additionally, CEG indicated some students</p>		pp. 58

will be slated for “mandatory” tutoring. More information is needed on how this intervention will work in reality and how the school will mitigate barriers impacting attendance for these at-risk students.		
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Application includes a narrative of a typical school day.		p. 64
Attendance goal (added to the amended application) is clearly defined.		p. 60
Concerns/Questions		Page
The application includes a section on “cultural professional development”; however, the previously referenced curriculum (Section 1.3) surrounding character development (Sanford Harmony) is not referenced here. Additionally, “Trauma-informed classrooms” are vaguely mentioned for the first time in this section and it is unclear how this concept shows up throughout the school calendar or typical school day.		p. 61

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.9 SPECIAL POPULATIONS AND AT-RISK STUDENTS

- Characteristics of a strong response:
- An identified founding school team member with experience working with special populations.
 - Clear process for identifying students with disabilities, English Language Learners, and at-risk students, and gifted students.
 - Clear description of RTI² procedures, including a plan for how data will be collected, progress will be monitored, and instructional decisions made related to student performance
 - A viable plan to provide students with special needs with instructional programs, practices, and strategies that ensure access to the general education curriculum and academic success.
 - Requirements and processes for monitoring services to students in need and plans to exit students that attain sufficient progress.
 - An understanding of, and capacity to fulfill, State and federal obligations and requirements pertaining to students with disabilities and English Language Learners.
 - A realistic plan for hiring licensed and highly qualified personnel including service providers, nursing, and educational assistants.
 - Evidence of adequate resources and staff to meet the needs of all students, including professional development for teachers.

Initial Application Review

<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
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Strengths	Page
Cornerstone Prep provides multiple environments for students. Students may participate in mainstream classes with inclusion, general education settings, self-contained, or a mixture of various settings. Students settings are based on their needs as identified through their IEP.	pp. 61
There is a clear and detailed description of the special education program that is in keeping with IDEA in all aspects. RTI will be implemented; data will be used for all subgroups to ensure that all students progress and to address the needs of those who aren't progressing.	pp. 61-69
Provides clear procedures for identifying and placing ELLS for appropriate service following state policy Provides a clear process for RTI and evidence of how data will be collected, analyzed and used for instruction	pp. 61 pp. 63
School's model of internal and external service providers for special populations is well-balanced and complete; delineation of roles between instructional staff, administrative staff, and support staff is clear and roles complement each other well, especially in instructional model	

Concerns/Questions	Page
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CPS will use the same data process for data analysis to evaluate data and academic process for students with disabilities, English Learners, at risk students and gifted students. How are they providing students with different opportunities to be successful?	pp. 64
Service to ELLs is vague and requires more detail on the push in co-teaching method and pull out instruction plan.	pp. 61
Lack of detail included in the application around staffing needs to ELs., including but not limited to teachers and translators, as appropriate.	pp. 62
The narrative needs a clearer explanation of RTI ² process, including a plan for how data will be collected, progress will be monitored, and instructional decisions made related to student performance.	pp. 69
Proposal needs more elaboration on plan for hiring licensed and highly qualified personnel including service providers and educational assistants and how the plan fits within an operating budget.	pp. 62

Evidence of adequate resources and staff to meet the needs of all students, including professional development for teachers is lacking in the narrative.		Varies pp. 64
Narrative needs to better articulate an understanding of, and capacity to fulfill, State and federal obligations and requirements pertaining to students with disabilities and English Language Learners.		
it appeared that there was no clear process for identifying SWD other than when the teacher finds a child is struggling? Are there any other methods to identify students with suspected disabilities?		
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
Strengths		Page
Applicant added more detail around processes for EL students, although still limited.		p. 67-68
Concerns/Questions		Page
The applicant states that the CEG ESL Model is “rigorous”; however, there are not specific details regarding what the model entails. It is unclear how the ELL Lead(s) will support the school-level ELL teachers.		p. 67-68
The applicant adds the following ESL co-teaching models-- <i>content-based pull-out program, in combination with a co-teacher push-in model</i> but there is not evidence of how this model will be implemented. Additionally, there is no evidence of specificity to what may be indicated for specific needs outlined in the students’ ILP.		p. 67
The description provided about professional development for serving special populations is generic and lacks specificity.		pp. 67-68
While the applicant states they will only hire licensed teachers, considering the national teacher shortage, it is unclear how the proposed operator will mitigate potential hiring challenges regarding potential licensure shortcomings.		p. 68

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.10 SCHOOL CULTURE AND DISCIPLINE		
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> ▪ A clear vision for school culture or ethos that will promote a positive academic environment and will reflect high levels of academic expectation and support. ▪ Coherent plan for creating and sustaining the intended culture for students, teachers, administrators, and parents from the school's inception, and for integrating new students and families as they arrive. ▪ Plan for how school culture will embrace students with special needs. ▪ Student discipline policy (Attachment B) that provides for effective strategies to support a safe, orderly school climate and strong school culture while respecting student rights. ▪ Evidence of legally sound discipline policies that outline discipline procedures, suspension, and expulsion procedures and appeals processes. ▪ If not included as part of school handbook (Attachment B), inclusion of student discipline policy (Attachment C) ▪ Thoughtful consideration of how the discipline policies protect the rights of students with disabilities. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
Strengths		Page
<p>The student handbook is provided in Attachment B. The information listed in the handbook aligns with the mission and vision of the school.</p>		pp. 70
<p>Behavioral plans will be created for students who need additional support. All students will be held to high expectations, but some students will need individual behavior plans and other supports to reach those high expectations.</p>		pp. 71
<p>Student Incentives are incorporated into the culture. "It is important that we recognize students for the positive behaviors that they demonstrate. At CPS, students may earn daily, weekly, monthly and quarterly behavior incentives."</p>		pp. 73
Concerns/Questions		Page
<p>The de-merit system and the examples given are broad and not aligned to age-appropriate expectations nor account for special populations. More information is needed about the demerit process and how the system and structure work.</p>		pp. 72
<p>Further explain the de-merit system and its incorporation into the suspension process.</p>		pp. 72-75
<p>The narrative needs a more specific articulation of how the vision for school culture will promote a positive academic environment and reflect high academic expectations and intense support systems, including elaboration on specific PBIS strategies.</p>		pp. 71
<p>Plan needs elaboration on how school culture will embrace students from all subgroups (including, EL special needs, homeless) and how items will ensure that there is access and equity for all.</p>		pp. 71
<p>Operator should demonstrate vision for and connect its disciplinary and incentive structures to specific behaviors that promote and detract from the ideal school culture at different grade levels for each desired core value included, beyond the singular provided examples, such that school culture can be built, measured and maintained through learnable teacher actions and consistent responses to student interactions K-8.</p>		pp. 72-73
<p>How will incentive structures change and maintain relevance between lower and upper grades?</p>		pp. 73
<p>Which staff are responsible for tracking, planning for, and administering the daily, weekly, monthly, and quarterly incentives? A team of three staff, whose tasks seem generally related to the intervention aspects of the school's</p>		pp. 78 -80

<p>culture, is identified, but none of them are delineated as the point on these cultural systems which require significant planning and execution lift.</p> <p>In school suspension (ISS) is a primary responsibility of the Reset Coordinator but is not listed or described in the school’s disciplinary policy. Additionally, in school suspension was identified as a disciplinary option for Students with Disabilities but not for general education students. The application would benefit from explaining this rationale.</p> <p>What is the plan for communicating desired culture to ELL parents and students?</p> <p>Applicant needs to provide a clear look at their discipline policy and what the processes for expulsion and suspension are.</p>	<p>pp. 70, 78, 180</p> <p>pp. 73</p> <p>pp. 74</p>
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Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard

Strengths	Page
The application includes mindfulness of an inclusive and safe environment for special populations and students experiencing academic challenges.	p. 79
There is an expectation expressed in the application to fostering a cultural norm of making and correcting mistakes (“normalizes academic errors and encourages productive struggles”).	p. 78
Applicant includes a variety of intervention strategies paired with a detailed explanation and original example.	pp. 79-81

Concerns/Questions	Page
Trauma-informed classrooms was a concept mentioned in section 1.8 but does not appear in this section with the new additions.	N/A
Aspects of the Sanford Harmony (character development) curriculum are not mentioned in this section with the new additions.	N/A
The applicant mentions PBIS interventions and strategies. Is the proposed school aiming to be a PBIS school? PBIS information was new to the amendment application.	p. 82
Is the proposed school meant to establish an inclusive setting for special populations? For example, the application states: “The ESL and SPED teachers will also be used to co-plan activities or approaches that special populations can respond to best”—what specifically will be implemented in the co-teaching model to ensure that special populations are not singled-out or isolated?	p. 83
In regards to the additions of the tiered interventions, it is unclear if the basis of these tiers stem from RTIb and inclusion of the information discussing “embracing students with special needs, including students with disabilities, ELL, and students at risk of academic failures”.	pp. 83-84
How does the “professional cultural development” impact school culture (the concept is not mentioned in this section; however, is added in the amendment application as pare of Section 1.8).	N/A
The demerit system presented exemplifies no evidence or efforts of intervention (for example, there is no mentioning of establishing Behavioral Intervention Plans). Additionally, there is no evidence of opportunities for healthy de-escalation (i.e. 6.Extreme Disrespect (i.e. raising voice, responding with negative comments -- “shut up,” “get out of my face,” “you are petty,”; walking away while the teacher is talking to them, etc.). The specific language examples appear to culturally insensitive and directed toward certain student populations.	p. 89

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.11 MARKETING, RECRUITMENT, AND ENROLLMENT		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Articulated student recruitment and marketing plan, timeline, and enrollment policy that will provide equal access to all interested students and families, including those in poverty, academically low-achieving students, students with disabilities, and English Language Learners. ▪ Enrollment policy (Attachment D) that complies with state law and district policies. ▪ Compelling student outreach plan that includes community, family, and student involvement, and that is realistic and likely to foster student retention and community support. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
There is a calendar of possible recruitment activities leading up to the opening of the school.		pp. 82
The applicant proposes a detailed and thoughtful recruitment strategy that should yield positive results. The strategy addresses how it will recruit students from specific subgroups.		pp. 81-83
The marketing strategy includes outreach to numerous community organizations with connections to families with school-age children.		pp. 83
Recruitment and enrollment plan are strong and well-paced, scaling from information distribution to registration and matriculation at the appropriate time for when families generally make enrollment decisions		pp. 82
Concerns/Questions		Page
Provides a list of community partners that will assist in supporting engagement, but given existing agreement there is no evidence of support going forward or within the target community, along with letters of support in commitment as evidence that there are relationships within the proposed community, and with community leaders.		pp. 85, 194
Descriptions of community partners and how they might strengthen the mission and execution of goals/objectives for the proposed school would be beneficial to understand how they play into the school’s mission/vision.		pp. 84
While operator includes ESL educational quality as a primary community concern, operator’s plan in application is not extremely robust. The operator should demonstrate how school will be a value addition over other available neighborhood options in this regard to meet this community priority?		pp. 82-83
Section C provides no information that is community specific for Sherwood/Parkway Village. This is a new community that the operator is seeking to work in, do they have community connections?		pp. 82 -83
Are these organizations assisting with recruitment in Sherwood/Parkway Village? There are community organizations that are not in the proposed location. Applicant should provide clarity on who are current partners and who are specific to this neighborhood for expansion and for their proposed location.		pp. 83
The applicant should provide additional details on what it has done to assess and build community demand. Although the applicant included some direct quotes from neighborhood individuals, more detail is needed on neighborhood engagement.		pp.84
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard

Strengths	Page
N/A	
Concerns/Questions	Page
<p>While CEG mentions it has been in operation for 8 years in Memphis, it is still unclear how this fact is relevant to the target area the school wishes to open.</p>	p. 101
<p>The application states that a new school leader has been hired (even though the proposed school has not completed the authorization process). While the school leader may have “general” positive rapport with the community, it is unclear if the “community” mentioned here is reflective of the desired target area.</p>	p. 101
<p>The applicant needs to provide more details on what it has done to assess and build community demand. There was not additional information, besides the hiring of the school leader, added to discuss how the leader will finalize the conversations. While the school leader may be “familiar” with the target area, there is still insufficient evidence of support from the target area.</p>	p. 102
<p>The applicant states that the partners listed in the application “already work in or near Sherwood and Parkway Village and therefore are familiar with the community”. While some of the organizations may work within the community, they are not reflective of the target location.</p>	p. 103

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.12 COMMUNITY INVOLVEMENT AND PARENT ENGAGEMENT

Characteristics of a strong response:

- Effective strategies for informing parents and the community about the school's development both pre- and post- authorization.
- Clear plan for informing and educating parents on school policies.
- A sound and compelling plan for engaging parents and community partners in the design and life of the school.
- Description of existing community resources and partnerships already formed that will benefit students and parents and that include a description of the nature, purposes, terms, and scope of services of any such partnerships; and evidence of commitment from identified community partners including documentation of pledged support (**Attachment E**), if available.
- Letters of support, MOUs, or contracts (**Attachment E**) to show proposed school is welcomed by the community.

Application Review

<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
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Strengths	Page
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The parenting classes and additional community services offered will benefit the community if implemented with fidelity and with a sound plan (see below).	pp. 87
The applicant describes sound plans for engaging parents and the community with varied activities and events.	pp. 86
There are reasonable plans for informing parents of school policies.	pp. 87
Usage of weekly report card system ensures a value add of consistent communication with families beyond traditional school model	pp. 87
Opportunities for parent volunteerism in the school promotes overall community connection	pp.87

Concerns/Questions	Page
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The plan does not clearly outline how students will be recruited once the school year has started. It simply says that students will be recruited. Parents of Pre-K students will be contacted. How this information will be obtained and the way that the school will engage with the public to ensure enrollment numbers is unclear.	pp. 86
The parent involvement highlighted is not robust and doesn't provide details outside of special events to engage parents. Can operator provide brief description of some of its parent events and what each's goals and objectives are to give LEA a clearer picture of how these come together to achieve parent engagement goals/objectives?	pp. 86
The plans for involving parents in the early stages is limited to recruitment and marketing (e.g., signs in the yard), the applicant discussed this briefly in the interview, and should expound on it here.	pp. 86
The applicant has yet to confirm partnerships with community organizations through letters of support, MOUs or contracts.	Att E
More explanation around parent sessions is needed around its curriculum and how it helps meet the overall goals for the student and families.	pp. 86-87

Final Application Review

<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
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Strengths	
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Includes parent ambassadors in the recruitment process.	p. 104
Application provides a robust list of how parents and community members could be visible in the school.	p. 104-105

Concerns/Questions

Direct community engagement appears to only be geared toward city-wide recruitment (e.g. Porter Leath and day cares that have allowed CEG); however direct mailers and billboards appear to be the main method of engagement for those in the proposed community where the school would be located. p. 104

While there has been an addition to the application to include parents in the recruitment process, it is unclear if the parents would be from the target area where the school anticipates opening. p. 104

Applicant has not included finalized partnerships or letters of support for this school. Att. E

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.13 EXISTING ACADEMIC PLAN (FOR EXISTING OPERATORS)		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Provides a clear description of the existing academic plan. ▪ Key features of the existing academic plan that will significantly differ from the operator’s existing schools (if any). ▪ Clear, concise rationale for any academic program variance that includes implementation strategies, resources needed, and expected outcomes. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
Strengths		Page
Concerns/Questions		Page
The operator should respond to this section as listed in the Tennessee Department of Education Charter School application.		pp. 88
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
Strengths		Page
N/A		
Concerns/Questions		Page
The school opted out of responding to this section in the amended application.		p. 106

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

1.14 PERFORMANCE MANAGEMENT (FOR EXISTING OPERATORS)		
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> ▪ Clear description of any mission-specific goals and targets the organization will have, with measures and/or assessments fully described and a rationale for their choices. ▪ Clear and compelling explanation of how the organization will measure its academic progress – individual students, student cohorts, all grade levels within a school and across the network of schools. ▪ Appropriate, well-defined corrective action plan if one school, student cohort, or entire network of schools falls below state and/or district academic achievement expectations. ▪ Clear and concise contingency plans that describe in great detail how the organization will react in the event academic targets are not met, and how the organization will react to adversity through delayed or modified growth. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
The applicant benefits from having a system in place that includes goals and aligned assessments to track performance. Strong plans exist to monitor performance and to take corrective actions should data indicate the need for them.		pp. 89-90
Concerns/Questions		Page
It is unclear how they will measure and evaluate school and individual success. The narrative lists the tests that they will analyze; however, it does not make mention of how the data will be analyzed. The information does not tell what % or benchmark numbers will be utilized to determine the need for intervention. More information should be provided on the specific processes.		pp. 89
How is the organization tracking cultural/leading measures and other listed items and how does that play into data trends and monitoring school performance?		pp. 90
How does the network ensure capacity to maintain a pipeline for leadership?		pp. 90
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Applicant includes parent and staff surveys as a mechanism for tracking cultural measures.		p. 109
Concerns/Questions		Page
The additional information provided in the application surrounding intervention efficacy and overall processes for performance management remains barebones. More detail is needed to discuss what an intervention would be for a school, grade-level, or classroom based off of the historical data used. In additional context in the amended application comparison of data points is discussed, but not next steps to intervention.		p. 108-109
The leadership pipeline addition reflects a deficit model—focusing on replacing poor performing leaders as opposed to developing staff into quality leaders.		p. 110

SECTION 1 ACADEMIC PLAN DESIGN AND CAPACITY

SUMMARY COMMENTS

Each part of your summary comments should, in a few sentences, provide a clear understanding of your overall evaluation of the proposal as well as the most significant strengths and/or weaknesses. The summary comments for each section should support your rating for the section and should not be simply cut and pasted from your subsection analysis.

Summary Rating for Entire Academic Plan Design and Capacity		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<p>Strengths: The goals are aligned to the mission and vision, and the applicant depicts how its systems and structures will support the mission and how their network’s best practices will be replicated. The mission provides clear and measurable goals, although there are still some questions related to them. The mission provides two core beliefs referenced throughout the application; Wisdom and Knowledge.</p> <p>Weaknesses/Questions: More information is needed to confirm that the operator has reached out to community stakeholders within the Sherwood and Parkway Village neighborhoods and rallied support from families and community partners in that area. It’s unclear that the operator understands the full needs of the neighborhoods and has done a full analysis of the schools in both areas, since the comparative analyses doesn’t include all schools. The application has a mission and vision that aligns with CEG internal work. However, it lacks evidence that differentiates appropriate grade level curriculum. It also lacks details around engaging students with disabilities and ELL students. The application needs more specific details to support embedded claims, data, and instructional methods.</p>		
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<p>Strengths: The goals are aligned to the mission and vision, and the applicant depicts how its systems and structures will support the mission and how their network’s best practices will be replicated. The mission provides clear and measurable goals, although there are still some questions related to them. The mission provides two core beliefs referenced throughout the application; Wisdom and Knowledge.</p> <p>The applicant added additional detail regarding curriculum choices (both academically and culturally) throughout the academic section.</p> <p>(If Any) Weaknesses: There are concerns surrounding support needed for special populations. The application demonstrates a lack of understanding developing strong programs for SPED and ELL as well as accurate measure to assess progress based on IEPs and ILPs. There were new school models introduced in the amended application such as “trauma-informed” programming. It is unclear if the school plans to be a trauma-informed school or a PBIS school. There are significant red flags regarding lack of cultural understanding and proximity to the target area the school proposes to open, community support in the target areas, and overall understanding of the student demographics and need for adjustment in programming, if necessary. These concerns juxtaposed with the limited access of community by-in poses a challenge for the prospective school. The applicant was also asked to complete Section 1.13 and they did not adhere to the request.</p>		

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.1 GOVERNANCE		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Strong understanding of the roles and responsibilities of a governing board including structure, size, powers, duties, and expertise that aligns with the school's mission and vision. ▪ Proposed structure is likely to ensure effective governance and meaningful oversight of school performance, operations, and financials. ▪ Evidence the proposed board members will contribute the wide range of knowledge, skills, and commitment needed to oversee a successful charter school, including but not limited to educational, financial, legal, and community experience and expertise. ▪ Plans for meaningful board training as required by law. ▪ If applicable, a timely plan for creating or transitioning from a founding board to a school governing board. ▪ Clear, compelling plans to ensure parents have access to the governing board, including a process for complaints that is fair, transparent and a plan for communicating the process. ▪ Sound plan and timeline for board recruitment, expansion and orientation of new members. ▪ Governance documents (Attachments F1-F7) are complete and align with state laws and district policies. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Board members will serve on one of two primary committees; academic and operational.		pp. 92
The process for parent complaints is included in the parent handbook. The process allows for appropriate board member involvement for matters that aren't resolved at the school/Executive Director levels.		pp. 94
Board expansion policies do well to maintain future members' objectivity and ensure they are well trained.		pp. 92,93
Operator seems to have a strong board generally, as evidenced by resumes.		pp. 95
Concerns/ Questions		Page
The governing board at the minimum will only meet 4 times a year. There is concern that more meetings will be needed to ensure effective oversight of the school with a new operator.		pp. 92
How has the governing board planned for and will maintain charters/operations in both SCS and the ASD simultaneously, including the navigation of the LEAs' variances during meetings?		pp. 92
How will the board and its committees support the strategy for the addition of a fourth school in terms of increased enrollment territory/community, new facility management, and expanded enrollment, beyond its current capacity?		pp. 93
The operator should explain why the board is not planning to expand to include voice/membership with expertise in targeted location.		pp. 92
Application mentions trainings with Tennessee Charter School Association, which no longer exists, as board training.		pp. 94
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
The applicant states that the governing board will meet as needed outside of the regular quarterly meetings. Additionally, the applicant references compliance with posting all board meetings per the TCA open records law.		p.. 112
The applicant clearly delineates the role of the governing board (focused on adherence to policy and law) and the executive director (focused on day-to-day school specific operations as well the pre-opening plan).		p. 112

Concerns/ Questions	Page
N/A	

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.2 START-UP PLAN		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Compelling plan for leading the development of the school from post-approval to opening, including identification of a capable individual or team to lead the planning and start-up, as well as a viable plan for compensating this individual or team during the planning year. ▪ Adequately addresses potential challenges. ▪ Detailed start-up plan specifying tasks and timelines which are aligned with a sound start-up budget. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
The school organization has other schools in their network. They already have these documents created from previous schools. A list of clear next steps and roles are identified in a start-up plan table.		pp. 96
The executive director and other essential members are already working within the network. There is limited capital needed for new employees in the newly proposed school.		pp. 96
The start-up plan includes all of the necessary elements for a successful opening with appropriate staff identified to carry out the various tasks. The plans for compensation have also been addressed for work done in the planning year. As the applicant currently operates three schools in Memphis, they are aware of and have made appropriate contingencies for potential challenges.		pp. 96-98
Operator will open doors of current elementary school as a recruitment tool so that new families/families from a community without a similar school can see what they are signing up for.		pp. 98
Reassigning teachers from other places in the organization should catalyze the school’s ability to ensure success in developing school model alignment during replication.		pp. 98
Concerns/Questions		Page
Unclear of what the needs will be for the start-up cost. The narrative identifies not needing to pay for staff because they are already in the network but does not adequately describe other financial needs. It does not refer to attachments or where this information can be found.		pp. 97
Has the operator changed any elements of its current model to ensure it is able to meet the current and future realities of this new community?		pp. 98
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
The applicant adequately outlined both their current budget and future budget as well as evidence of financial sustainability.		pp. 118-119
Concerns/ Questions		Page
N/A		

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.3 FACILITIES		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Facility plans are reasonable and adequately meet the requirements of the educational program and anticipated student population. ▪ A sound plan and timeline for identifying, financing, renovating, and ensuring code compliance for a facility. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
The middle school and elementary school will be located in the same building allowing the school to share important common areas. The proposed school will be 80,000 to 110,000 square feet.		pp. 99
The applicant is clear about its space needs to carry out the proposed program; however, it is not in the proposed area (see below)		pp. 99-101
Concerns/Questions		Page
The size of the proposed art room, computer lab, gymnasium, and other areas are not listed.		pp. 99
There are not any viable options that the school leaders have found in the area. How are organizational members working to secure a location? Location can be one of the most difficult objectives in finding viable properties. A better plan to solidify a facility needs to be created with multiple contingencies.		pp. 100
Identify school location is shown in September-December window; if retrofit options are not available, this window will be too late for new construction; school should demonstrate multiple timelines for multiple options/pathways that include finance and construction timelines.		pp.100
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Size information for the art, gym, and computer lab have been updated.		p. 120
Concerns/ Questions		Page
The applicant has not provided evidence of potential buildings or viable building alternatives—particularly that will be located in the target area to ensure a facility.		p. 121

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.4 PERSONNEL/ HUMAN CAPITAL		
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> ▪ The school's organizational charts (Attachment G) clearly delineate the roles and responsibilities of – and lines of authority and reporting among – the Board, staff, any related bodies (such as advisory bodies or parent/educator councils), and any external organizations that will play a role in managing the school. ▪ If leader is identified, chosen leaders have necessary qualifications, competencies, and capacity for their assigned roles and resumes for school leadership are included (Attachment H). If available, includes previous student achievement data for school leadership (Attachment H). NOTE: If school leader has not been chosen, a clear description of qualifications, expectations, responsibilities and timeline for hiring is included. ▪ Identifies strategies for supporting school leadership. ▪ Recruitment and hiring strategy, criteria, timeline, and procedures are likely to result in a strong staff and are well suited to the school. ▪ Compensation packages are likely to attract and retain strong staff are clearly defined. ▪ Provides a strong plan for supporting, developing, and annually evaluating school leadership and teachers that aligns statewide evaluation requirements. ▪ Effective planning for unsatisfactory leadership/teacher performance and turnover. ▪ Employee manual and personnel policies (Attachment I) are complete and effective. ▪ Staffing projections for each year are robust and aligned with the educational program and conducive to the school's success. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
<p>The plan for hiring the assistant principal includes the various interview steps that will be taken before an individual is identified. This information does not include what services or how these individuals will be identified.</p>		pp. 102
<p>CEG uses the Capstone Education Evaluation Model for all teachers. This model was approved by the state pursuant to State Board Policy 5.201</p>		pp. 106
<p>The organizational chart represents a sound reporting structure.</p>		pp. 101 Att G
<p>The applicant has solid plans for supporting school leadership and teachers. There are clear recruitment and hiring plans that should lend itself to recruiting quality personnel. Likewise, the compensation allows for bonuses that make working at the school attractive. The applicant outlines clear plans to address unsatisfactory performance. Staffing projections are sufficient to implement the program as described.</p>		pp. 101-109
Concerns/Questions		Page
<p>There is not a clear plan for identifying the school principal. The application states: "We believe we will have the school administrator (principal) hired before the end of February. We have used a very similar process as the one outlined below for the Assistant principal." This information was discussed during the capacity interview and should be expounded upon here.</p>		pp. 101
<p>The method of measuring the principal's success is not listed. It is just identified that the principal will report to the Executive Director.</p>		pp. 101
<p>The applicant mentions school leadership personnel, will be supported by Uncommon and Relay, but does not provide clarity what services and support look like with alignment to school goals.</p>		pp. 101
<p>Much of the attention is on school administration and general education concern. What steps will be taken to staff with appropriate language skills to engage with a dual or multilingual community?</p>		pp. 101

It states that school leaders will spend 75% of their time directly working with staff for development with strategies that require a lot of direct support. How will school leaders be able to balance their instructional support responsibilities with day to day operations of schools?	pp. 105
How is unsatisfactory work by teachers assessed and what is the clear procedure for corrective action using the identified Performance Improvement Plan?	pp. 106
A salary schedule for bachelor’s degrees and a flat increase of \$3500 for a graduate degree is outlined in the application. Additionally, a scale based on student achievement and tenure with CEG is included but beyond a general range no directed structure is provided. What are particulars of this performance bonus and how does it align with the goals of the school including the budget forecast?	pp. 107
For other positions, CEG simply outlines that salary and benefits will be based on “market rates.” How is market rate assessed?	pp. 108
Parkway Village is not an MTR operating neighborhood as of February 2020; does operator know that MTR will place its teachers in its Parkway Village school based on the school’s standing relationship? There is no attached letter of support delineating a plan to support Parkway Village/Sherwood from MTR, only a mention of one existing.	pp. 104
Definitions of coaching mechanisms should expand. No coaching is provided on data analysis, other than teachers expecting to attend data meetings.	pp. 105
21.5 school-dedicated founding team members for a school of 150 seems unbalanced. The operator needs to explain their rationale and how the budget will correlate.	pp. 109
Applicant has stated each K classroom would have two teachers in section 1 Planned enrollment is for 75 K students (or three classes) on p. 18. There is inconsistency and clarification needed around the model for students and teacher as it relates to the budget.	pp. 101
Final Application Review	
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard
<input type="checkbox"/> Does Not Meet Standard	
Strengths	
A school leader has been identified and the qualifications of the individual have been included as well.	pp. 123-124
Teachers can receive bonuses based on student achievement outcomes.	p. 131
Concerns/ Questions	
The applicant does not confirm that MTR has an official market in the Parkway Village/Sherwood area and appears to have a significant dependence on MTR for teacher placement.	p. 127
There data coaching/analysis protocol is not sufficiently outlined, and it is unclear how and what training surrounding an adopted school-wide data analysis protocol will entail.	p. 128
There is lack of clarity around what state approved evaluation model is being implemented for teachers and the school leader/principal.	p. 124
Sustainability around the “request candidates to provide evidence of their income so that CEG can ensure a significant wage increase when joining the organization” may be difficult over an extended period of time for all schools within the network. Although this has been established during “8 years of gathering data” there may be a long-term concern.	p.131
There are multiple misspellings in the additions to the applications – especially in this section, which may signal lack of attention to detail.	N/A

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.5 PROFESSIONAL DEVELOPMENT		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Professional development standards, opportunities, leadership, and calendar/scheduling effectively support the education program and are likely to maximize success in improving student achievement. ▪ Thoughtful plan for professional development in the areas of special education and English Language Learners, including implementation of IEP’s, discipline of students with disabilities and communication with ELL families. ▪ Professional development plan supports professional growth, generates collaboration, and cultivates future leadership. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
New teachers will have 3 weeks of intense PD during the summertime. Returning teachers will participate in two weeks of PD before the beginning of the school year. Students’ early release Friday will allow teachers to participate in 55 additional hours of professional development throughout the year.		pp. 110
Various school leaders assume responsibility for providing professional development, which includes weekly PD, data meetings, content specific PD, behavior management strategies, practice, and special populations.		pp. 110-12
The applicant offers a Leader Residency Role training to promote professional growth and cultivate future leaders, which has already resulted in teachers transitioning to leadership roles; although there is additional information needed to better understand the network program (see below)		pp. 113
Generally, the school has a very strong plan for PD that supports its model and also focuses in on the school being responsive throughout the year.		pp. 110
Concerns/Questions		Page
The plan for cultivating future leaders in the network is very vague.		pp. 113
The school does not plan to differentiate professional development for teachers in year 1. How will differentiation occur based on experience to push academic achievement?		pp. 113
PD plan needs to elaborate on programming for special education and English Language Learners, including the implementation of IEP’s, discipline of students with disabilities and communication with ELL families.		Varies
Summer professional development says three weeks for new staff, two weeks for returning staff, and a final week for teachers practicing lessons. The applicant should clarify what the overall scope of summer PD is, including the content and rationale, along with its attendees as there is conflicting information throughout the application.		pp. 110-12
There are multiple opportunities for professional development, but instructional planning seems to be conflated with professional development. How do data meetings specifically provide better approaches and practices for various as opposed to specific student needs?		pp. 110
The needs of special education and English language learners are not addressed. How will teachers of special populations as well as general education teachers develop knowledge, skills, and abilities specific to those populations?		pp. 110
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page

There are multiple professional learning opportunities outlined for general education teachers.	pp. 136-138
There is a leadership pipeline development plan included in the application.	p. 137
Concerns/ Questions	Page
There are no training opportunities described regarding co-teaching for both SPED and ELL.	N/A
There is no mentioning of the Sanford Harmony (character development) training to implement to character development curriculum, which was added in the amended application.	N/A

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.6 INSURANCE		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Plan to secure comprehensive and adequate insurance coverage, including worker’s compensation, liability, property, indemnity, directors and officers, automobile, sexual abuse and any other required coverage. ▪ If applicable, additional liability for such activities as sports teams. ▪ Insurance company letter (Attachment J) states required coverage will be provided upon approval of the charter school application. 		
Initial Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Insurance information can be found in Attachment J. The applicant will provide the requisite insurance coverage.		pp. 114 Att. J
Concerns/Questions		Page
N/A		
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Applicant satisfied the requirement in the initial application.		
Concerns/ Questions		Page

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.7 TRANSPORTATION – IF APPLICABLE		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Clear description of transportation plan that includes anticipated routes, extracurricular activities, and Saturday school where applicable. ▪ A comprehensive oversight plan that identifies school staff responsible for this oversight. ▪ Description of how the school will arrange transportation for special needs students where necessary. ▪ Demonstrated familiarity with state and federal regulations relating to provision of transportation services to students. 		
Initial Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Students who reside outside of a two-mile radius will be provided transportation services at no cost to the student.		pp. 114
Should the applicant decide to provide transportation, it will be free of charge to students and the guidelines for providing transportation have been outlined. In the absence of bus transportation, the applicant expects most students to provide their own transportation. There are plans to provide services for students with special needs.		pp. 115,116
Concerns/Questions		Page
The plan for extracurricular and Saturday school does not address a clear description of how this transportation will be provided. "CPS will transport students under the same expectations and guidelines when providing transportation to any extracurricular or after school activities, Saturday school or field trips. Students will be required to get signed permission slips for any such events."		pp. 115
The two areas in which CPS is looking to target are not particularly close. If the location of the school will be further into one neighborhood than the other, what will guide the decision to provide transportation?		pp. 115
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
N/A		
Concerns/ Questions		Page
The application does not clearly address the concerns regarding transportation equity which was amplified in the initial feedback.		N/A

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.8 FOOD SERVICE		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ A clear description of how the school will offer food service to all students, adhering to all nutritional guidelines. ▪ A plan to collect free and reduced-price lunch information, including procedures to receive reimbursement. ▪ A plan to ensure compliance with applicable state and federal regulations. 		
Initial Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Food services are contracted through SCS.		pp. 118
Concerns/Questions		Page
N/A		
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Applicant satisfied the requirement during the initial round of the application.		
Concerns/ Questions		Page
N/A		

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.9 ADDITIONAL OPERATIONS – IF APPLICABLE		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Detailed plans for use of technology within the classroom and for state assessments. ▪ Provides compelling data management plan that includes communication strategies for parents. ▪ Demonstrates understanding of health and safety requirements that includes a plan for hiring a registered nurse for creating individual health plans as required by law. ▪ Detailed safety and security plans for students, staff, guests, and property. ▪ Provides detailed maintenance plan for school facilities. ▪ If school plans to contract with a CMO, describes rationale and process for selecting CMO and explanation of why the CMO is a strong choice and good fit for the proposed school and community. ▪ Provides clear division of roles between the board and the service provider. ▪ If available, the CMO arrangement (Attachment K) is free of conflicts of interest and there is a viable plan for identifying and managing potential conflicts. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
CPS discussed technology used in the classroom: ▪ 10 Chromebooks in each classroom ▪ 1 document camera and projector in each classroom ▪ 1 iPad for teacher use ▪ 1 laptop for teacher use		pp. 120
Maintenance will be provided through a contracted service.		pp. 125
Narrative demonstrates understanding of health and safety requirements that includes a plan for hiring a registered nurse for creating individual health plans as required by law.		pp. 122-24
Narrative acknowledges need for safety and security plans for students, staff, guests, and property.		pp. 124
Concerns/Questions		Page
Sharing directory information with opt-in vs. opt-out options for parents is concerning. Please expound around reasoning while ensuring clarity around disclosure and the information included. Operations plan needs additional detail on FERPA compliance, including provision for electronic student tracking and data management and plan for securing paper files.		pp. 120
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
FERPA compliance language was added; however, it was not highlighted.		p. 147
Applicant provided a justifiable rationale regarding the student data directory opt-in vs opt-out option for parents.		p. 145
Concerns/ Questions		Page
N/A		

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.10 WAIVERS		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Detailed description of waivers requested that includes compelling and thoughtful rationale describing how the waivers will impact student achievement. ▪ A demonstrated understanding of the rules and statutes that cannot be waived under Tennessee law. 		
Initial Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Cornerstone Prep School did not seek any waivers.		
Concerns/Questions		Page
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Applicant satisfied the requirement during the initial round of the application.		
Concerns/ Questions		Page
N/A		

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.11 NETWORK VISION, GROWTH PLAN, & CAPACITY (FOR EXISTING OPERATORS)		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Detailed strategic vision for the network that includes a robust five-year network growth plan. Growth plan should include the following: proposed years of opening; number and types of schools; a clear, detailed outline of any pending applications (whether in the same LEA, Tennessee or another state); all current and/or targeted markets/communities and criteria for selecting them; and projected enrollments. ▪ Strong, compelling evidence of organizational capacity to open and operate high quality schools in Tennessee and elsewhere including specific timelines for building organizational capacity. ▪ Clear, detailed description of the results of past replication effort, challenges, and lessons learned, and how the organization has addressed any challenges. ▪ Realistic presentation of anticipated challenges and risks over the next five years associated with opening additional schools, along with a plan to overcome them to achieve the organization’s stated outcomes. ▪ Comprehensive and complete annual report (both network and individual schools) (Attachment L). ▪ If facility has been selected, facility plans are reasonable and adequately meet the requirements of the educational program and anticipated student population. ▪ If facility has not been selected, or selected facility needs renovations/upgrades, a sound plan and timeline for identifying, financing, renovating, and ensuring code compliance for a facility. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
All three CEG schools have moved off the Priority School list based on the most recent Published State Priority List or by meeting the Priority School Exit criteria.		pp. 127
The applicant proposes a thoughtful and strategic approach to network growth. There are plans for a fifth school. The applicant has outlined clear goals that outline performance expectations for the network.		pp. 127-29
Concerns/Questions		Page
The plan for increasing the organization lacks key information, including the enrollment capacity at the 5 schools.		pp. 127
During the capacity interview, the applicant discussed the “greenlighting process” that signals that the organization is ready for growth. The applicant should expound upon that answer here.		
The application should include risks related to academics and operations in this section, especially as it intends to add a fifth school in the coming years.		pp.129
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Applicant includes enrollment numbers for the 5 other CEG schools.		p. 154 - 156
The application includes a breakdown of the “greenlighting process”.		
The prospective operator develops a risk analysis.		
Concerns/ Questions		Page
There is insufficient evidence of how the growth of the school will actually be located on the target area and the criteria for selecting the areas based.		N/A

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.12 NETWORK MANAGEMENT (FOR EXISTING OPERATORS)		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Leadership team identified and role and responsibilities listed. ▪ As Attachment M, organizational charts for Year 1, Year 3, and Year 5 clearly delineate roles and responsibilities of the governing board, including lines of authority between the board, school leadership, and staff. If applicable, the chart should include other related bodies (advisory bodies or parent-teacher councils) and a charter management organization if school has contracted with one and it will play a role in managing the school. ▪ Clear, compelling network strategy that includes any shared or centralized support services, along with their costs, across the network. ▪ Strong description of relationship between schools and charter management organization, including presentation of a contract or MOU (if applicable). ▪ Fees from member schools are clearly delineated, along with a rationale for their collection, use, and structure (if applicable). ▪ Associated table provided in application is complete with explanations for school and organization-level decision-making responsibilities. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
The centralized support services staff essentially seeks to remove the tasks and responsibilities that burden or distract schools from their primary work of educating students,		pp. 131
The leadership team has been identified and their roles have been defined. The leadership team seeks to alleviate any burdens facing school’s leaders so that they can focus on students.		pp. 130-32
It appears that the operator understands the challenges of school founding incumbent upon their network.		pp.129
Concerns/Questions		Page
Are expansion plans in 26-27 contingent upon results, leadership turnover, financial sustainability, or other factors? How would school most realistically evaluate its potential for smart 26-27 replication?		pp. 127
Will variabilities in the future of the ASD in any way impact network’s expansion plans? If so, how, and how would school prepare itself to respond?		pp.127
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
The application includes an internal mechanism (“greenlighting process”) used to assess the feasibility of expansion.		p. 156
The applicant cites evidence that they are in good-standing with the ASD and has not been presented with any feedback that they would be unfit to expand.		p. 156
Concerns/ Questions		Page
N/A		

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.13 NETWORK GOVERNANCE (FOR EXISTING OPERATORS)		
Characteristics of a strong response:		
1) If there is a network board that operates as the main governing body with each school having an advisory committee: <ul style="list-style-type: none"> ▪ Applicant provides a complete description of the governance structure at the network level and delineates how that relates to each individual school within the network. ▪ Provides a robust plan for ensuring there is adequate local/Tennessee stakeholder representation. ▪ Roles and responsibilities of this board described clearly and concisely. ▪ Description of the current size and composition of the governing board, with a rationale of how the current/proposed governance structure and composition will ensure the desired outcomes of a network of highly effective schools. ▪ A clear and compelling plan to evaluate academic and operational success including the evaluation of the school and school leader (s). 		
2) If there will be one governing board for all schools at the local level, or separate governing boards for each school: <ul style="list-style-type: none"> • If there will be one governing board for all schools: <ul style="list-style-type: none"> ○ A clear, detailed description of the governance structure at the network level and how it relates to the individual school including any changes that will take place at the board level for it to be effective (if necessary). ○ A copy of the by-laws and organizational chart is included. ○ A clear, thorough plan to transform the board’s membership, mission and by-laws to support the expansion plan. Plan should include timeline for the transition and orientation of the board to its new responsibilities. • If there will be a separate governing board for each school: <ul style="list-style-type: none"> ○ A clear, detailed description of how the new governing board will be formed and the relationship between the new and old boards described, along with any overlapping responsibilities. ○ Includes biographies of new board members, roles and responsibilities of the board described clearly and concisely, an organizational chart and governing board structure. ▪ By-laws of the new board are included (if available) and there is a plan in place for board training as required by Tennessee law. 		
Initial Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
The Governing Board governs all CEG schools and therefore there are no independent school specific boards. Each meeting contains agenda items addressing all schools and specific school issues when necessary.		pp. 133
The applicant proposes to have the same board composition should this application be approved. There will be parent advisory councils at each school that can provide feedback about concerns at individual schools.		pp. 133-35
Concerns/Questions		Page
There is not a clear and compelling plan to evaluate academic and operational success, including the performance of school leaders.		pp. 133-134
Please explain the rationale for having one parent on the board – and their relationship with the parent advisory councils, even as the network grows to include additional schools.		pp. 133
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Candidate responded to questions and concerns listed in feedback from the initial round.		
Concerns/ Questions		Page
N/A		

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.14 CHARTER SCHOOL MANAGEMENT CONTRACTS (IF APPLICABLE; FOR EXISTING OPERATORS)

Characteristics of a strong response:

- As **Attachment N**, a detailed, strong rationale explaining the selection of the CMO, including descriptions of proposed duration of the contract, roles and responsibilities of the governing board, school staff, and the service provider, scope of services provided, performance evaluation measures, financial controls, and terms of renewal.
- Draft of proposed management contract.
- Detailed documentation of CMO's non-profit status, including evidence it is authorized to do business in Tennessee.

Initial Application Review

Meets or Exceeds Standard

Partially Meets Standard

Does Not Meet Standard

Strengths

Page

N/A

Concerns/Questions

Page

N/A

Final Application Review

Meets or Exceeds Standard

Partially Meets Standard

Does Not Meet Standard

Strengths

Page

N/A

Concerns/ Questions

Page

N/A

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.15 PERSONNEL/HUMAN CAPITAL – NETWORK-WIDE STAFFING PROJECTIONS (FOR EXISTING OPERATORS)		
Characteristics of a strong response: <ul style="list-style-type: none"> Network staffing projections for each year are robust and aligned with the educational program and are conducive to the school's success. 		
Initial Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Clear staff projections. Projections represent multiple years.		pp. 136-38
Concerns/Questions		Page
This is a K-8 school. Is it simply being tagged as an elementary school in this section. What is the rationale?		pp. 136
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
In another section of the application, the applicant described why the campus, although K-8, was referred to as an elementary school stating, "The school will function as a k-5 school for the first several years before reaching 6th grade and will always have more elementary students than middle school students. Therefore, the school will frequently be referred to as an elementary school."		p. 159
Concerns/ Questions		Page
N/A		

SECTION 2 – OPERATIONS PLAN AND CAPACITY

2.16 PERSONNEL/HUMAN CAPITAL – STAFFING PLANS, HIRING, MANAGEMENT, AND EVALUATION (FOR EXISTING OPERATORS)		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Chosen leaders have necessary qualifications, competencies and capacity for their assigned roles. ▪ Identifies strategies for supporting school leadership. ▪ Recruitment and hiring strategy, criteria, timeline, and procedures are likely to result in a strong staff and meet requirements for being “highly qualified” and are well suited to the school. ▪ Effective planning for unsatisfactory leadership/teacher performance and turnover. ▪ The organizational charts (Attachment G) provided clearly delineate the roles and responsibilities of – and lines of authority and reporting among – the Board, staff, any related bodies (such as advisory bodies or parent/educator councils), and any external organizations that will play a role in managing the school. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
2.16 is addressed in 2.4. Attachment G contains the school's organizational chart.		pp.139 Att G
Concerns/Questions		Page
Please see feedback in Section 2.4		Section 2.4
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
The applicant addressed feedback presented in the initial review of the application that pertain to this section. A detailed overview of both the school level and network level organizational structure was sufficiently addressed in Section 2.4.		Section 2.4
Concerns/ Questions		Page
N/A		

SECTION 2 OPERATIONS PLAN AND CAPACITY

SUMMARY COMMENTS

Each part of your summary comments should, in a few sentences, provide a clear understanding of your overall evaluation of the proposal as well as the most significant strengths and/or weaknesses. The summary comments for each section should support your rating for the section and should not be simply cut and pasted from your subsection analysis.

Summary Rating for Entire Operations Plan and Capacity		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<p>Strengths: The application demonstrates an understanding of how to operate a school successfully. And the components that are necessary. The operator has managed two schools off the priority list.</p> <p>Weaknesses/Questions: The school lacks a robust plan to engage with parents, identify and communicate with ELL students, and successfully measure success of school administration. The school has an overall strong budget and cash reserves but has not clearly outlined start-up cost for after-school programs, transportation and differentiated professional development. There is not a clear and compelling plan to evaluate academic and operational success.</p>		
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<p>Strengths: The application amendments demonstrate sufficient evidence surrounding feasibility with expansion. Competitive teacher salaries are also included from a staff and personnel perspective. Clearer delineation was presented between that of the proposed network office and the duties and responsibilities of school level leadership. Based on the additional evidence includes, the applicant appears to possess financial viability to support an additional school.</p> <p>(If Any) Weaknesses: There are several concerns with the lack of quality options presented for training to support special populations (SPED and ELL). Connectedness to the proposed target location is still absent. A realistic plan does not exist regarding recruitment and retention of licensed teachers.</p>		

SECTION 3 – FINANCIAL PLAN AND CAPACITY

3.1 & 3.2 CHARTER SCHOOL FINANCING		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Budget worksheet (Attachment O) contains assumptions and reasonable budget numbers that reflect rent, utilities, maintenance, insurance and build-out costs. • Detailed budget assumptions that include the impact of the anticipated number of students who receive free or reduced-price lunches. • Detailed financial procedures, policy, or other reasonable assurance that the proposed school will have sound systems and processes in place for accounting, payroll, and independent annual school-level and network-level (where applicable) financial and administrative audits. • Sound criteria and procedures in place for selecting contractors for any administrative services. • Complete, realistic, and viable start-up and five-year operating budgets. • Detailed budget narrative (Attachment P) that clearly explains reasonable, well-supported revenue and cost assumptions, including grant/fundraising assumptions, identification of the amounts and sources of all anticipated funds, property, or other resources (noting which are secured vs. anticipated, and including evidence of firm commitments where applicable). • Sound contingency plan to meet financial needs if anticipated revenues are lower than estimated. • Individual and collective qualifications for implementing the financial plan successfully, including capacity in areas such as financial management, fundraising and development, and accounting. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
The organization shows financial strength and has 1.2 million dollars in personal contribution in addition to state revenues.		pp. 475
Including FY19 financials with a fund balance of \$14M shows stability and the ability to manage finances well.		pp. 475
Staffing is in line with the District and State Staffing Formula.		pp.336
Attachment P notes that shortfalls will be covered by CPS cash reserves.		pp. 355
Concerns/Questions		Page
Individual qualifications are only given for the Executive Director. The executive director does not represent the entire financial capacity of the organization. Information about the credentials for the financial officer should be included.		pp. 143
There are no funds listed for payroll services, legal fees, audit services, and financial services.		pp. 342, 352
BEP is high if the assumption is capital outlay and transportation are excluded.		pp. 339
Attachment P states legal fees are budgeted at \$10,000 however, no amount is reflected in the budget.		pp. 355
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Including FY19 financials with a fund balance of \$14M shows stability and the ability to manage finances well.		p. 475
Staffing is in line with the District and State Staffing Formula.		p. 336
Attachment P notes that shortfalls will be covered by CPS cash reserves.		p. 355

A \$50,000.00 contingency is added to the pre-opening budget.	p. 7 of 31
Concerns/ Questions	Page
The budget excludes financial services, legal fees, audit services, and payroll services.	p. 19 of 31
Attachment P states legal fees are budgeted at \$10,000 however, no amount is reflected in the budget.	p. 355

SECTION 3 – FINANCIAL PLAN AND CAPACITY

3.3 FINANCIAL PLAN (FOR EXISTING OPERATORS COMPLETING SECTIONS 3.1 AND 3.2)		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Detailed description of the fiscal health of other schools in the network (if applicable) including a comprehensive description of any schools on fiscal probation or in bankruptcy. ▪ Complete, realistic, and viable budget for the network (Attachment Q). The budget includes reasonable, well-support revenue and cost assumptions, including grant/fundraising assumptions, identification of the amounts and sources of all anticipated funds, property, or other resources (noting which are secured vs. anticipated) and including evidence of firm commitments where applicable. ▪ Sound contingency funds to meet financial needs if anticipated revenues are lower than estimated. 		
Initial Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths	Page	
CEG operates 3 schools with positive cash flow. CEG has covered annual expenses every year since its inception and therefore has no schools on fiscal probation or in bankruptcy.	pp. 144	
Auditor identified school as a low financial risk.	pp. 483	
Over 6 million in savings over the network.	pp. 485	
All of the schools in the network have a positive cash flow; none are on fiscal probation or in bankruptcy.	pp. 144	
The network has contingency funds to meet revenue shortfalls.	pp. 143	
Concerns/Questions		Page
N/A		
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths	Page	
Applicant satisfied the requirement in the initial application.		
Concerns/ Questions		Page
N/A		

SECTION 3 – FINANCIAL PLAN AND CAPACITY

3.4 FINANCIAL PLAN (FOR EXISTING OPERATORS NOT COMPLETING SECTIONS 3.1 AND 3.2)		
Characteristics of a strong response: <ul style="list-style-type: none"> ▪ Budget assumptions and reasonable budget numbers that reflect rent, utilities, maintenance, insurance and build-out costs of facilities. • Detailed financial procedures, policy, or other reasonable assurance that the proposed school will have sound systems and processes in place for accounting, payroll, and independent annual school-level and network-level (where applicable) financial and administrative audits (both school level and network level). • Complete, realistic, and viable start-up and five-year operating budgets for network and individual schools (Attachment Q) that align with the academic plan and operations plan included in the application. If applicable, clearly describes the fiscal health of any other schools in the network and any fiscal issues the schools have faced (bankruptcy, fiscal probation, etc.). • Detailed budget narrative (Attachment P) that clearly explains reasonable, well-supported revenue and cost assumptions, including grant/fundraising assumptions, identification of the amounts and sources of all anticipated funds, property, or other resources (noting which are secured vs. anticipated, and including evidence of firm commitments where applicable). • Sound contingency plan to meet financial needs if anticipated revenues are lower than estimated. Particularly important is Year 1 cash flow projections and contingency, as well as a 24-month cash-flow projection. • Individual and collective qualifications for implementing the financial plan successfully, including capacity in areas such as financial management, fundraising and development, and accounting. • Detailed budget is inclusive of both individual schools and network. ▪ All cost revenues and all major expenditures are accounted for and are realistic. 		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
N/A		
Concerns/Questions		Page
N/A		
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
N/A		
Concerns/ Questions		Page
N/A		

SECTION 3 FINANCIAL PLAN AND CAPACITY

SUMMARY COMMENTS

Each part of your summary comments should, in a few sentences, provide a clear understanding of your overall evaluation of the proposal as well as the most significant strengths and/or weaknesses. The summary comments for each section should support your rating for the section and should not be simply cut and pasted from your subsection analysis.

Summary Rating for Entire Financial Plan and Capacity Section		
Initial Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<p>Strengths: CEG operates all current schools with positive cash flow. CEG has covered annual expenses every year since its inception and therefore has no schools on fiscal probation or in bankruptcy. The network has over \$6M in savings with contingency plans and funds should there be shortfalls.</p> <p>Weaknesses/Questions:</p>		
Final Application Review		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<p>Strengths: The applicant exemplified satisfactory evidence of competitive staff salaries. Evidence also suggested that the proposed school has a strong cash reserve.</p> <p>(If Any) Weaknesses: Although the applicant meets the standards. The budget excludes financial services, legal fees, audit services, and payroll services. Attachment P also states legal fees are budgeted at \$10,000; however, no amount is reflected in the budget. Cash reserves do suggest that the school would be able to sustain this cost.</p>		

SECTION 4 – PORTFOLIO REVIEW/PERFORMANCE RECORD

4.1 PAST PERFORMANCE (FOR EXISTING OPERATORS)		
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> ▪ Applicant provides clear, compelling evidence of successful student outcomes for each school in the network (Portfolio Summary Template, Attachment S) and evidence that the operator’s schools are high performing and successful by meeting state standards and national standards (Attachment R). ▪ Graduation rates are indicative of highly successful graduation strategies (if applicable, Attachment R). ▪ Applicant selects one or more of the organization’s consistently high-performing schools and provides a detailed narrative outlining primary causation of high-quality, high-performing status, along with description of challenges met and overcome. ▪ Applicant selects one or more of the organization’s low or unsatisfactorily performing schools and provides a detailed narrative outlining primary causation of low performing school(s) in the network and specific strategies outlined that corrected, or will correct, the deficiencies (if applicable). ▪ Latest audit (Attachment U) shows no findings and is prepared in accordance with generally accepted accounting and auditing principles as is outlined in Tennessee law. ▪ Organization is in good standing wherever they have located schools, and there have been no revocations, litigation that has resulted in negative outcomes, non-renewals, or financial, organizational, or academic deficiencies (if applicable, Attachments T and V). 		
Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
Cornerstone Prep Denver was the highest performing school in the ASD in 2019		pp. 366
9-point gains in proficiency over the prior year were seen in Math in 2019		pp. 366
Students enjoyed a composite score of 5, the highest possible composite score on the Tennessee Value-Added Assessment System (TVAAS) in back to back years.		pp. 366
The applicant has an academic blueprint which it attributes to the success of the network. When a school within the network demonstrates poor performance, the applicant makes use of data and the blueprint to identify the problems and get the school back on track. All of the schools are in good standing with the ASD.		pp. 147-151
Concerns/Questions		Page
The applicant relies on limited data (TVAAS and MAP) as evidence to support its claim of creating a successful educational program for low income students who find themselves below grade level. More detail and data are needed to support this claim and evidence is needed to show the network is meeting state and national standards.		pp. 147 Attachment R, S
The applicant states “TCAP/TN Ready results prove that the educational program is a success and demonstrated the ability to increase student achievement levels by meeting or exceeding state standards.” However, the applicant does not provide any data to support this claim. No AMO attainment data is included to indicate the schools within the network are meeting or exceeding state standards.		pp.148 Attachment R
The applicant makes the claim “ Lester Prep consistently outperforms most schools serving a similar demographic” but provided no quantitative comparative data to support this claim. The applicant makes comparative statements about how the school performed against schools in the ASD but not the against schools in the city, state or nation. Additionally as the narrative addresses challenges, it fails to discuss the declining on-track or mastered rates Lester Prep experienced in 2019 by 2 grade levels in ELA, 1 in math and 3 in Social Studies.		pp. 148, p. 369
Results at applicant’s Lester Prep have slowed considerably since 2014 as measured by MAP, to some of the school’s lowest levels in recent years since existence. The operator should address why this change has occurred at its middle school, especially in literacy?		pp. 368

<p>In 2019, the network saw on-track and mastery rates averaging 7, 9, 10% in ELA, 12, 17 and 27% in Math and 16% in Social Studies. These rates represent a decline in 4 out of 7 instances; however, the applicant does not address these low proficiency numbers as a challenge in neither the identified high performing nor low performing school. As a college prep school, what is the rationale for focusing on growth only and not identifying low mastery rates?</p>		pp. 369
Final Application Review		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
Strengths		Page
N/A		
Concerns/ Questions		Page
<p>The application poses a large reliance on growth data from both TNReady and NWEA MAP, but there is an absence of proficiency data regarding TNReady and data purporting the amount (percentage) of students on (or off) grade level as it relates to NWEA MAP.</p>		p. 177
<p>Insufficient comparatives exist between ASD, SCS and the CEG as more broad statements are made as opposed to actual data.</p>		p. 177