
BEFORE THE TENNESSEE STATE BOARD OF EDUCATION

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IN RE:) **State Board of Education Meeting**
The Gentlemen and Ladies STEM Academy) **November 15, 2019**
Charter School Appeal)
)

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

Pursuant to Tennessee Code Annotated (T.C.A.) § 49-13-108, sponsors proposing to open new charter schools may appeal the denial of their amended application by a local board of education to the State Board of Education (State Board). On September 27, 2019, The Gentlemen and Ladies STEM Academy (GLA-STEM) appealed the denial of its amended application by Shelby County Schools (SCS) Board of Education to the State Board.

Based on the following procedural history, findings of fact, and Review Committee Report attached hereto, I believe that the decision to deny the GLA-STEM amended application was not “contrary to the best interests of the students, LEA, or community.”¹ Therefore, I recommend that the State Board affirm the decision of SCS to deny the amended application for GLA-STEM.

STANDARD OF REVIEW

Pursuant to T.C.A. § 49-13-108 and State Board policy 2.500, State Board staff and an independent charter application review committee (Review Committee) conducted a de novo, on the record review of the GLA-STEM 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.

In order to overturn the decision of the local board of education, the State Board must find that the local board's decision to deny the charter application was contrary to the best interests of the students, LEA, or community.⁴ Because GLA-STEM 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 January 30, 2019, the Sponsor, The LeFlore Foundation, submitted a letter of intent to SCS expressing its intention to file a charter school application.
2. The Sponsor submitted its initial application for GLA-STEM to SCS on April 1, 2019. SCS assembled a review committee to review and score the GLA-STEM application.
3. Shelby County Schools asked all sponsors to complete a supplement to the Tennessee Department of Education charter school application template in Section 1.2 – Enrollment by responding to Shelby County Schools' 2019 Regional Seats Analysis. This supplement was turned in with the initial application.
4. On May 8, 2019, a SCS panel, which included external expert reviewers, held a capacity interview with the Sponsor.
5. The review committee recommended denial of the GLA-STEM initial application.
6. On June 25, 2019, the SCS Board of Education voted to deny the GLA-STEM initial application based upon the review committee's recommendation.
7. The Sponsor amended and resubmitted its application for GLA-STEM to SCS on July 26, 2019.
8. SCS's review committee reviewed and scored the GLA-STEM amended application and again recommended denial.
9. The GLA-STEM amended application was also recommended for denial based on a regional seat analysis conducted by SCS pursuant to 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."
10. On September 17, 2019, based on the SCS staff recommendation, the SCS Board of Education voted to deny the GLA-STEM amended application.

⁴ Ibid.

11. The Sponsor appealed the denial of the GLA-STEM amended application in writing to the State Board on September 27, 2019, including submission of all required documents per State Board policy 2.500.
12. At the time of appeal to the State Board, the Sponsor did submit proposed corrections to the application as allowed under T.C.A. § 49-13-108(b)(4). Pursuant to State Board policy 2.500, the State Board staff accepted some proposed corrections; the Sponsor was notified of the corrections that were not accepted.
13. The State Board’s Review Committee analyzed and scored the GLA-STEM amended application using the Tennessee Department of Education’s charter application scoring rubric.
14. The State Board’s Review Committee conducted a capacity interview with the proposed governing board of GLA-STEM and key members of the leadership team on October 30, 2019, in Nashville.
15. On November 5, 2019, the State Board staff held a public hearing in Memphis. 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 GLA-STEM amended application.
16. After the capacity interview, the Review Committee determined a final consensus rating of the GLA-STEM amended application, which served as the basis for the Review Committee Recommendation Report.

FINDINGS OF FACT

- **District Denial of Application.**

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

Name	Title
Parker Couch	Memphis Grizzlies Prep (initial)
Beth Seling	National Association of Charter School Authorizers
Terinni Stafford	Shelby County Schools, Coordinated School Health (initial)
Emily Barbee	Shelby County Schools, Curriculum & Instruction
Abasi McKinzie	Shelby County Schools, English Language Learners
Ivory Stewart	Shelby County Schools, Exceptional Children
Daschia Rand	Shelby County Schools, Finance (initial)
LaTonya Goodman	Shelby County Schools, Finance (amended)
Aisha Thornton	Shelby County Schools, Human Resources
Dr. George Stewart	Shelby County Schools, Mental Health
Michelle Stuart	Shelby County Schools, Operations
Tonya Hervey	Shelby County Schools, Professional Development (initial)
Gina True	Shelby County Schools, Student Support

Danielle Clewley	Shelby County Schools, Specialist, Organization Quality, Office of Charter Schools
Daphné Robinson	Shelby County Schools, Director of Office of Charter Schools (initial)
Brittany Monda	Shelby County Schools, Director of Office of Charter Schools (amended)
DeVonté Payton	Shelby County Schools, Advisor, School Development, Office of Charter Schools

The GLA-STEM initial application received the following ratings from the SCS review committee:

Sections	Rating
Academic Plan Design and Capacity	DOES NOT MEET STANDARD
Operations Plan and Capacity	PARTIALLY MEETS STANDARD
Financial Plan and Capacity	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 June 25, 2019. Based on the review committee’s recommendation, the SCS Board of Education voted to deny the initial application of GLA-STEM.

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

Sections	Rating
Academic Plan Design and Capacity	DOES NOT MEET STANDARD
Operations Plan and Capacity	PARTIALLY MEETS STANDARD
Financial Plan and Capacity	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 September 17, 2019. Based on this recommendation and the regional seat analysis conducted in accordance with SCS Policy #1011 – Charter Schools, the SCS Board of Education voted to deny the amended application of GLA-STEM.

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

Following the denial of the GLA-STEM amended application and their subsequent appeal to the State Board, State Board staff assembled a diverse Review Committee of experts to evaluate and score the GLA-STEM amended application. This Review Committee consisted of the following individuals:

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

Name	Title
Scott Campbell	Executive Director, Persist Nashville
Ashley Davis	Independent Consultant
Dr. Diarese George	Director of Recruitment, Nashville Teacher Residency
Whitney O’Connell	Schools Implementation Manager, EVERFI
Nate Parker	Coordinator of Policy and Federal Programs, State Board of Education
Steve Robbins	Independent Consultant

The Review Committee conducted an initial review and scoring of the GLA-STEM 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 GLA-STEM amended application was as follows:

Sections	Rating
Academic Plan Design and Capacity	DOES NOT MEET STANDARD
Operations Plan and Capacity	DOES NOT MEET STANDARD
Financial Plan and Capacity	DOES NOT MEET STANDARD

The Review Committee recommended that the application for GLA-STEM be denied because the applicant failed to provide sufficient evidence in the academic, operational, and financial sections that the application meets the required criteria of the rubric. The academic plan presented by the applicant lacked a comprehensive academic focus and plan, clear academic performance standards, and a clear assessment plan. The application did not adequately describe how the school would serve its special populations, and the application lacked a compelling marketing, recruitment, and enrollment plan.

The operations plan presented by the applicant did not demonstrate a clear governance structure and did not provide a comprehensive or realistic start-up plan, including a plan to recruit and train staff. Also, the applicant intends to dissolve its existing private school, The Gentlemen and Ladies Academy, Inc., which currently serves grades Pre-K through 2, and transfer its elementary students, staff, and resources to the proposed public charter school.⁶ This appears to conflict with statute (T.C.A. § 49-13-106) that forbids the conversion of a private school into a public charter school.

Finally, the financial plan presented by the applicant provided the review committee with little evidence of complete, realistic, or viable start-up and five year operating budgets. The budgets significantly underestimated costs, omitted essential budget line items, and did not include student enrollment growth for projected expense assumptions. In addition, the application did not provide a

⁶ This differs from what the applicant shared at the public hearing, which is a separate part of the State Board’s review that operates apart from the work of the Review Committee. During the public hearing, when asked if they planned to move students from the existing school to the new school, the applicant answered less definitively by saying that the existing school would no longer exist and students would apply to attend the new school.

detailed plan for fiscal management. Finally, the application and budget were misaligned in several areas thus failing to provide evidence of a sound financial plan for the school.

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

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

- **Public Hearing**

Pursuant to statute⁷ and State Board policy 2.500, a public hearing chaired by the Executive Director was held in Memphis on November 5, 2019. SCS's presentation at the public hearing focused on the argument that the denial of the GLA-STEM amended application was in the best interests of the students, LEA, and community. SCS grounded its argument in the deficiencies found by the SCS review committee in the amended application after conducting a review process aligned to the State Board Quality Authorizing Standards and National Association of Charter School Authorizers (NACSA) best practices. Specifically, SCS found the GLA-STEM amended application did not meet the standard in the academic plan, as it did not provide a rigorous and compelling description of a STEM curriculum, a detailed description of performance goals, or established community partnerships. SCS also expressed concerns regarding the operational section of the application because of the conflicting role of The LeFlore Foundation with the school and the lack of clarity in the role of the principal. Finally, SCS stated that the financial section did not meet standard because of its overreliance on high student enrollment and the lack of accuracy in budget projections.

In addition to deficiencies noted in the amended application, SCS grounded its denial in SCS Board Policy #1011 – Charter Schools, which requires applicants to demonstrate a community need by addressing one of three options: academic underperformance of area schools, over enrollment of schools in an area, or new programmatic options. SCS stated that all charter school applicants were required to complete a supplement to the charter school application where sponsors were asked to address how the proposed school met community needs. As a part of its rationale for denial of the GLA-STEM amended application, SCS stated that 32% of the charter schools (18 of 56) in Memphis are at least 30% below the enrollment capacities listed in their applications, and the SCS 2019 regional seat analysis was an additional tool to analyze the best interests of the community. Using its regional seats analysis, SCS stated that the applicant did not meet any of the three criteria as there are over 1000 unfilled seats, both in traditional public schools and charter schools, in the east region of the city, which includes the neighborhoods of both Easy/Gray's Creek and Cordova. Because of the oversaturation in the Cordova area, the intended location of the school, SCS stated that GLA-STEM could not demonstrate a community need, and

⁷ T.C.A. § 49-13-108(b)(4).

therefore, was one of the reasons for denial of the application. When asked if the SCS Board of Education was aware of the State Board rule 0520-14-01-.01 that prohibits districts from denying charter school applications for failure to address additional priorities, SCS stated the Board was aware of this rule. However, SCS stated that the Board hoped the State Board would consider oversaturation as a “lens through which the [district’s] charter review team reads Section 1.2 – Enrollment.” SCS further stated, “the application of the Board Policy #1011 through the use of the regional seats analysis guided the review of the applicant’s rationale and the community’s need.”

In response to SCS, the Sponsor highlighted their concerns about the transparency of the application review process. The Sponsor believed that they did not receive a fair opportunity to address the district’s concerns because they received new feedback on sections of the amended application that had not been changed between the initial and amended application phases. Since there are limitations in statute to the corrections that a Sponsor can make to the amended application upon appeal to the State Board, the Sponsor stated that they did not have a reasonable opportunity to fix deficiencies identified by SCS. In addition to sharing concerns about the district’s process, the Sponsor stated that they identified a need for a STEM-focused school in the Cordova area, which would meet the need of future workforce demands. Since The LeFlore Foundation currently operates an organization in the Cordova community, the Sponsor spoke of hearing from parents about the need for an additional charter school option in the area. Additionally, the Sponsor stated that its school operations could be flexible based on the number of students that they enroll, and they set their enrollment projections high so that they could accommodate all students who might be interested in the school. The Sponsor expressed confidence in meeting their enrollment projections because the organization has been operating in the Cordova area for eight (8) years.

A portion of the public hearing was dedicated to taking public comment, but there was no public comment given at the hearing. In addition, the State Board received forty-nine (49) individuals providing written comment in support of the application.

- **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. At the public hearing, State Board staff questioned SCS regarding its authorization process and alignment to the Quality Authorizing Standards. SCS articulated that its application process is fair, transparent, and focused on quality with rigorous criteria for approval. As evidence of this, SCS pointed to their use of the State Charter Application, the formation of a review committee made up of both internal and external experts trained on the process to evaluate each application, and hosting a capacity interview with every applicant to ensure a fair review. Additionally, SCS highlighted their use of informational sessions for applicants as a means to increase transparency in their process. Based on the information presented by SCS, this part of the district’s process appears in alignment with State Board Quality Authorizing Standards.

However, SCS stated that the SCS Board of Education was aware of the State Board’s rule prohibiting using an applicant’s failure to address a district’s additional priorities as a reason for denial, but the Board proceeded with the denial of the GLA-STEM amended application, at least in part, because of failing to address the additional priority. This decision making process does not align with the Quality Authorizing Standard that states, “a quality authorizer makes authorizer decisions that will result in positive student outcomes, in accordance with state law.”

ANALYSIS

State law requires the State Board to review the decision of the local board of education and determine whether the denial of the proposed charter school was in the “best interests of the 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. One such standard is to maintain high but attainable standards for approving charter applications. In making my recommendation to the Board, I have considered the Review Committee Report, the documentation submitted by both the Sponsor and SCS, the arguments made by both the Sponsor and SCS at the public hearing, and the public comments received by State Board staff and conclude as follows:

The Review Committee’s report and recommendations are thorough, 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 GLA-STEM amended application did not rise to the level of meeting or exceeding the standards required for approval.

Pursuant to State Board Rule 0520-14-01-01 Approval of a Charter School, a local board of education may ask sponsors to address additional priorities as a means of evaluating the best interests of the students, LEA, or community. However, “chartering authorities may not deny or refuse to review an application for failing to address additional priorities.” At the public hearing, SCS officials acknowledged that applicants were asked to complete a supplement to the state’s application in Section 1.2 – Enrollment to demonstrate community need, per SCS Board Policy #1011 – Charter Schools. Furthermore, SCS confirmed that the application was recommended for denial, in part, because it did not meet the additional SCS regional seat analysis priority contained in SCS Board Policy #1011 – Charter Schools. While the regional seat analysis was not the only reason SCS denied the GLA-STEM amended application, pursuant to State Board rules, it should not have been used as a reason for denial.

Given the great responsibility of educating students and the amount of public funds entrusted to a charter school that is approved by a local district, the State Board expects that only those schools that have demonstrated a high likelihood of success and meet or exceed the required criteria in all areas will be authorized. It is readily apparent that the Sponsor is dedicated to the community that it currently serves with its private school and before- and after-care program. Moreover, the Sponsor identifies a need in the community for additional STEM programming to meet future workforce demands. However, I agree with the review committee’s assessment that the academic plan lacked specificity in how the academic

⁸ T.C.A. § 49-13-108.

program would be operationalized, how the school planned to meet the needs of all learners, and how the ambitious enrollment projections would be met in less than ten (10) months.

Additionally, the application lacked specificity in how it would recruit and hire staff that specialize in the school's unique approach to STEM instruction or train teachers to implement this curriculum. In a competitive recruitment market, the lack of a robust recruitment strategy for specialized teachers is concerning, especially given the school's need to staff nine (9) grade levels in Year 1. Finally, the budget assumptions did not meet the standard for approval with the underestimation of costs necessary to operate a school and the lack of a detailed plan for fiscal management. A quality authorizer requires all applications to present evidence of a solvent and sustainable budget and contingency financial plans, and the applicant did not present clear and convincing evidence that it meets this standard for approval.

Therefore, because the application did not meet the standard for approval in the academic, operational, or financial sections, I cannot recommend that the State Board approve the Sponsor's amended application. However, this recommendation does not diminish my belief in the Sponsor's passion and sincere desire to serve the students in the Cordova area of Memphis.

CONCLUSION

For these reasons, and for the reasons stated in the Review Committee Report attached hereto, I do not believe that the decision to deny the amended application for The Gentlemen and Ladies STEM Academy was contrary to the best interests of the students, the LEA, or the community. Therefore, I recommend that the State Board affirm the decision of SCS to deny the amended application for The Gentlemen and Ladies STEM Academy.



Dr. Sara Morrison, Executive Director
State Board of Education

11/12/2019

Date



EXHIBIT A

Charter Application Review Committee Recommendation Report

November 8, 2019

School Name: The Gentlemen and Ladies STEM Academy (GLA-STEM)

Sponsor: The LeFlore Foundation

Proposed Location of School: Shelby County Schools

Evaluation Team:

Scott Campbell
Ashley Davis
Dr. Diarese George
Whitney O'Connell
Nate Parker
Steve Robbins

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 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 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 three sections of the application: Academic Plan Design and Capacity, Operations Plan and Capacity, and Financial Plan and Capacity.
2. **Capacity Interview:** Based on the independent and collective review of the application, the review committee conducted a 90-minute in-person interview with the sponsor, members of the proposed governing board, and identified school leader (if applicable) to address the concerns, weaknesses, and questions identified in the application, and to assess the capacity to execute the application's overall plan.

3. Consensus Judgment: At the conclusion of the review of the application and the capacity interview, the committee submitted a final rubric and developed a consensus regarding a rating for each section of the application.

This recommendation report includes the following information:

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

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

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

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

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

Summary of the Application

School Name: The Gentlemen and Ladies STEM Academy (GLA-STEM)

Sponsor: The LeFlore Foundation

Proposed Location of School: Shelby County Schools

Mission:¹ The mission of the GLA-STEM is to facilitate an inclusive high-performance learning atmosphere for elementary and middle school students and equip them with foundational skills necessary for success in high school, college, career, and community.

Number of Schools Currently in Operation by Sponsor: 0

Proposed Enrollment:²

Grade Level	Year 1 (2020)	Year 2 (2021)	Year 3 (2022)	Year 4 (2023)	Year 5 – At Capacity (2024)
K	60	75	95	100	105
1	60	75	95	100	105
2	60	75	95	100	105
3	60	75	95	100	105
4	60	75	90	100	105
5	60	75	90	100	105
6	55	70	90	100	105
7	45	65	65	65	65
8	45	65	65	65	65
Total	505	650	780	830	865

Brief Description of the Application:

The LeFlore Foundation (LeFlore) is proposing to open a combined elementary and middle school in the Cordova³ area of Memphis, Tennessee and serve students in grades K through 8th. The school, GLA-STEM, is a new-start school and plans to employ a science, technology, engineering, and math (STEM) instructional model infused with creative arts and life skills to offer a unique option to elementary and middle school students in East Memphis.⁴

The proposed school will be organized under the existing non-profit entity of LeFlore, and the applicant projects the school will have \$350,000 in revenue and \$235,441 in expenses in Year 0, resulting in a positive ending balance of \$114,559. LeFlore projects the school will have \$4,612,165 in revenue and \$3,736,759 in expenses in Year 1, resulting in a net income of \$875,406 and a positive ending fund balance

¹ The Gentlemen and Ladies Academy Amended Application, pg. 2.

² Ibid. pg. 25.

³ Ibid. pg. 13.

⁴ Ibid. pg. 1.



of \$989,965. By Year 5, the school projects to have \$7,900,045 in revenue and \$6,044,460 in expenses, resulting in a net income of \$1,855,585 and a positive ending fund balance of \$7,872,838.⁵ The school anticipates that 34.9% of the student population will qualify as economically disadvantaged, 10.6% of the student population will be students with disabilities, and 7.4% of the student population will be English Learners (ELs).⁶

⁵ Ibid. Attachment O-Planning and Budget Worksheet.

⁶ Ibid. pg. 26.

Summary of the Evaluation

The review committee recommends denial of the application for GLA-STEM because the applicant failed to provide sufficient evidence in the academic, operational, and financial sections that the application meets the required criteria of the rubric.

The academic plan presented by the applicant lacked a comprehensive academic focus and plan, clear academic performance standards, and a clear assessment plan. The application did not adequately describe how the school would serve its special populations. Finally, the application lacked a compelling marketing, recruitment, and enrollment plan.

The operations plan presented by the applicant did not demonstrate a clear governance structure and did not provide a comprehensive or realistic start-up plan including a plan to recruit and train staff. Also, the applicant intends to dissolve its existing private school, The Gentlemen and Ladies Academy, Inc., which currently serves grades Pre-K through 2, and transfer its elementary students, staff, and resources to the proposed public charter school. This appears to conflict with statute (T.C.A. § 49-13-106) that forbids the conversion of a private school into a public charter school.

Finally, the financial plan presented by the applicant provided the review committee with little evidence of complete, realistic, or viable start-up and five year operating budgets. The budgets significantly underestimated costs, omit essential budget line items, and do not include student enrollment growth for projected expense assumptions. In addition, the application did not provide a detailed plan for fiscal management. Finally, the application and budget were misaligned in several areas thus failing to provide evidence of a sound financial plan for the school.

Summary of Section Ratings

In accordance with the Tennessee Department of Education’s charter application scoring rubric, “applications that do not meet or exceed standard in every area...will be deemed not ready for approval,”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 rating for each section of the application are as follows:

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

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

Analysis of the Academic Plan Design and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee:

The applicant's Academic Plan Design and Capacity does not meet standard because it lacked a comprehensive academic focus and plan, clear academic performance standards, and a clear assessment plan. The application did not adequately describe how the school would serve its special populations. Finally, the application did not include a compelling marketing, recruitment, and enrollment plan.

First, the academic focus and plan was underdeveloped and lacked core components necessary for a successful academic program. While the applicant conveyed passion for providing a STEM-focused option in the proposed community, the application did not provide sufficient evidence of a developed STEM academic program, including what curriculum they would use or how their plan will align with Tennessee academic standards or assessments. The application repeatedly mentioned aligning to Common Core State Standards as well as PARCC assessments, neither of which are used in Tennessee, and their plan was entirely dependent on hiring STEM consultants to create their program. During the capacity interview, the applicant explained they had not chosen a consultant yet and was unable to identify a single STEM consultant they had considered or researched prior to submitting the application. Therefore, the review committee did not find evidence to support the implementation of the proposed academic plan.

Additionally, the application lacked clear academic achievement goals and a means to monitor progress on goals. During the capacity interview, the committee pressed for a clear academic achievement goal, and the applicant failed to provide a specific, measurable, and realistic goal or adequately explain how they will monitor progress toward goals. Similarly, the application listed numerous assessments, including NWEA, PARCC, NAEP, ACT, and others, as part of their assessment model, many of which are not aligned to Tennessee standards or relevant to their school model.

Second, the application lacked a viable plan to serve its special populations and at-risk students. During the capacity interview, when asked about the RTI² process, the applicants did not provide compelling evidence of a clear understanding for how to implement the process. When asked how the school would provide services for special populations in their daily schedule, they stated that there would be time for RTI services before and after the regular school day, and they did not indicate a plan to offer services during regular school hours.

Finally, despite having a current presence in the community, the application failed to provide a compelling outreach plan that provided evidence of GLA-STEM's capacity to open a K through 8th school, with an enrollment of over 500 students, in less than one year. Further, the applicant did not display sound reasoning in the enrollment assumptions, particularly in future years when the projected 6th grade enrollment of 100 students dropped to a projected 7th grade enrollment of 65 students without explanation. During the capacity interview, the applicant was unable to describe how they determined their enrollment projections, failed to explain why they projected a drastic drop in enrollment after 6th grade, and could not provide a clear plan for how they would retain their students each year. Given the number of significant questions left unanswered by the application and capacity interview, the committee determined GLA-STEM's academic plan does not meet the standard established in the rubric.

Analysis of the Operations Plan and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee:

The applicant's Operations Plan and Capacity does not meet standard because the applicant did not demonstrate a clear governance structure and described plans to convert its private PreK-2 school into its proposed charter school. Also, the application did not provide a comprehensive or realistic start-up plan or a compelling plan to recruit and train staff.

First, the application did not provide evidence of a governance structure able to ensure effective governance and meaningful oversight of the proposed school. The school's sponsor, The LeFlore Foundation, is currently affiliated with The Gentlemen and Ladies Academy, Inc., a private school serving grades PreK through 2 and a before- and after-school program. The applicants explained that their proposed school, GLA-STEM, would be a separate entity with its own governing board separate from LeFlore. However, the board documents submitted with the application were for The LeFlore Foundation. While The Gentlemen and Ladies Academy, Inc. will continue to operate as a PreK program and offer before- and after-school care, during the capacity interview, the applicants stated they planned to "dissolve" their K-2 school and "convert it" into GLA-STEM. The committee had concerns about the unclear relationship between the existing organizations and the new school, given its proposed shared space and resources, and plans to move three (3) teachers from The Gentlemen and Ladies Academy, Inc. into GLA-STEM. This appears to conflict with statute (T.C.A. § 49-13-106) that forbids the conversion of a private school into a public charter school.

In addition, the applicant did not present evidence of a comprehensive or realistic start-up plan. GLA-STEM proposed an ambitious start-up plan including opening nine (9) grade levels, enrolling over five hundred (500) students, and recruiting fifty (50) staff members in under a year; however, their start-up staff is only part-time. For example, the start-up plan involves hiring a principal in November, but the person would only work twenty (20) hours per week during Year 0. Similarly, a human resources director, office manager, and four (4) teachers would be hired in Year 0, but only work twenty (20) hours per week. The committee had concerns about the overreliance on part-time school employees to lead the start-up of the school. Further, in the start-up timeline, the school does not initiate student recruitment and enrollment activities until April 2020. During the capacity interview, the applicants did not know when the Shelby County Schools priority window was for the lottery system and therefore assumed April was the right time for enrollment. Together, these concerns illustrated the lack of a comprehensive or realistic start-up plan.

Furthermore, GLA-STEM's plan to recruit and train staff was insufficient. It was unclear who will lead staff recruitment in Year 0. During the capacity interview, the applicants mentioned the principal and the human resources director would share this work, but these positions are budgeted to be part-time. Also, the applicant's plan is highly dependent on determining hiring as they go based on unsubstantiated enrollment assumptions. For example, the application states: "GLA-STEM intends to identify and initially hire at least 2 teachers across every academic subject in early 2020. As student enrollment numbers increase during pre-opening, GLA-STEM will extend offers to more teachers previously identified as acceptable candidates..." (p. 145). Given the shortage of teachers and competition for highly qualified, appropriately credentialed staff, this plan was insufficient to assuage these concerns. During the capacity interview, the applicant did not identify where they would seek teachers with STEM experience. The



applicant explained they intend to hire some teachers in Year 0 and train them, and then use a “teach-the-teacher” model of training the whole staff on STEM methods. The committee did not find evidence of the school’s ability to adequately train STEM-competent teachers in the given timeline with only five (5) days of professional development prior to the start of the school year.

Finally, the start-up budget was missing some crucial costs. No funding was allotted for staff laptops, printing paper, or marketing materials, which would prohibit the school from performing tasks included in their start-up plan. Further, while their entire academic program relied on training and support from STEM consultants, GLA-STEM only budgeted \$8,000 for consultants to help produce their curriculum and train their staff on STEM practices in the start-up plan. Thus, the committee determined there was no compelling plan for leading the development of the school from post-approval to opening.

Analysis of the Financial Plan and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee:

The Financial Plan and Capacity does not meet standard because the applicant provided little evidence of complete, realistic, or viable start-up and five year operating budgets, did not provide a detailed plan for fiscal management, and was inconsistent or misaligned in several areas with the remainder of the application.

First, the application lacked complete, realistic, and viable start-up and five year operating budgets. The budgets were missing numerous critical and costly items. For example, the budget allocated only \$10,000 for transportation when \$100,000 was projected in their BEP Transportation revenue. In addition, the budget allocated \$0 for health services, contracted Special Education (SPED) services, an EL teacher, custodial expenses, student furniture, instructional technology, library books, internet/network equipment, and building decorum. During the capacity interview, the applicant indicated that The Gentlemen and Ladies Academy, Inc. owns multiple buses and has a “stockpile” of materials they plan to use at GLA-STEM; however, the application itself failed to adequately account for these materials. Furthermore, the budget was dependent on uncertain staff recruitment needs. During the capacity interview, the applicant stated that if they struggled to attract teachers they would increase their starting salaries; however, it is unclear how the school would pursue this contingency plan in a financially feasible way. Finally, the provided budget underestimated a number of large budget items, particularly concerning rent for the facility and utilities projections, and lacked proper enrollment growth assumptions. These precarious budget assumptions, paired with a failure to include essential line items in the budget, led the committee to find the proposed financial plan incomplete, unrealistic, and unviable.

In addition, the application lacks a feasible plan for fiscal management. The applicant explained that their financial management “will be overseen by the Governing Board and audited annually by a third party [sic] CPA firm” and the school’s day-to-day operation expenses “will flow through the Principal and be approved by the Board” (p. 2, Attachment P). The committee did not find a plan involving the governing board approving all expenses on a day-to-day basis feasible. Further, it is also not practical for the principal to approve every expense given her vast amount of other responsibilities. The office manager, which is mentioned in the budget, is not referenced in this section. It is unclear if this role has responsibilities related to day-to-day financial responsibilities. Since there are numerous outstanding questions related to fiscal management, the committee determined the application lacks the capacity to ensure sound financial management.

Finally, there are multiple instances where the budget is inconsistent with personnel, programs, and materials discussed in the application. For example, the application discusses the role of the director of curriculum and includes this position in Year 0, but does not account for the role in the Years 1-5 staff assumptions. Additionally, the application states the school “will hire one highly qualified special education instructor in year one and two in years two through five” (p. 98), but the budget indicates four (4) Special Education Teachers (p. 10, Attachment O). Also, the technology plan states that each student will “be provided a netbook for daily classroom activities” (p. 174), but the budget only accounts for one-hundred 100 laptops in Year 1 for a projected enrollment of 505 students (p. 16, Attachment O). Further, their budgeted personnel does not meet the staffing need based on their proposed class size limits and enrollment projections. Given these issues, the review committee found insufficient evidence that the



applicant's budget was appropriate, realistic, and viable or that the applicant could adequately implement the financial plan.



Evaluation Team

Scott Campbell is the Executive Director of Persist Nashville, a 501c3 non-profit that empowers Nashville students to earn a college degree. Persist Nashville Inc. currently coaches over 471 Nashville college students. Previous to starting Persist Nashville, Scott was the Principal of RePublic High School in Nashville, TN. At RePublic he lead his school to a Bronze Medal ranking by the US News and World Report as one of the top 6 schools in Nashville. Under his leadership they improved the ACT average of his students by 4.42 points which contributed to over \$3 million in scholarships offered for his first graduating class of 115 students. Previous to RePublic, Scott spent two years in Nashville helping develop Valor Collegiate Academies as a lead teacher, 6th Grade Chair, and department chair. Before the move to Nashville he was the Assistant Principal at Thomas Jefferson High School for Science and Technology in Alexandria, VA, one of the top high schools in America. Previous to his work as administrator Scott spent 10 years in the classroom teaching AP United States History, AP United States Government and Politics, World History, US History, Economics, Civics, and Ethical Leadership. He has coached varsity level soccer, volleyball, and cross-country and served as the sponsor for leadership retreats, policy debate, philosophy club, student government, and philosophy club. He has served at urban, rural, and suburban as well as traditional public, magnet, and charter schools in 5 different states. He received his M.S. in Secondary Education and B.A. in Political Science with minors in History and Secondary Education from the University of Tennessee. He also received his Ed.S. from The George Washington University in Washington, DC in Educational Leadership and Administration.

Ashley Davis is an Educational Consultant and provides instructional support to charter schools and nonprofits in Memphis. She most recently served as the Residency Director for the Relay Graduate School of Education where she worked in partnership with numerous schools and networks across Memphis to coach and develop Teacher Residents. Prior to joining Relay, she served as a Lead Teacher and later as Principal at Memphis College Prep. Ashley received a dual Bachelor of Arts in Communication and English from the University of Pennsylvania and a Master of Science in Digital Media from Columbia University.

Dr. Diarese George serves as the Director of Recruitment for the Nashville Teacher Residency, and the founder and President 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. 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's degree in business administration, master's degrees in corporation communications and business administration, and a doctorate in education leadership.

Whitney O'Connell is currently working as a Schools Implementation Manager for EVERFI in Manhattan and as a curriculum consultant for Mosa Mack Science and the Big History Project. She has 5 years of teaching experience in a variety of schools, most recently at Explore! Community School in East Nashville. Prior to working at Explore!, Whitney acted as an intern at the International Bureau of Education (UNESCO) in Geneva, Switzerland collaborating on projects with the Malaysian Ministry of Education regarding gender-responsive STEM education. She was previously a corps member in Teach For America



acting as a kindergarten teacher in Connell, Washington and has taught early childhood education internationally in Peña Blanca, Honduras. Ms. O’Connell earned her B.A. at Gustavus Adolphus College in Spanish and History and her M.Ed. at University of Washington in Curriculum and Instruction.

Nate Parker serves as the Coordinator of Policy and Federal Programs for the Tennessee State Board of Education. In this role, he manages LEA compliance and federal programs for State Board authorized charter schools. He is also currently enrolled in Vanderbilt University’s Doctor of Education program in K-12 Education Leadership and Policy. Prior to joining the State Board staff, Nate worked in regional operations at KIPP Nashville. Nate is a former Teach For America alum with a decade of experience as a secondary teacher, assistant principal, and principal, working in traditional public schools and charter schools in Arizona, Connecticut, Ohio, and Tennessee. He is twice a graduate of The Ohio State University earning a Bachelor of Arts Degree in Integrated Social Studies and a Master of Public Administration Degree, and a graduate of Arizona State University earning a Master of Education Degree in Secondary Education.

Steve Robbins is a Chicago-based education consultant who provides school finance expertise and charter school evaluation services. He has served as an independent evaluator of charter school applications in several jurisdictions, including New Orleans, Mississippi, Spokane (WA), Florida, New Mexico, New York, and Illinois. He has evaluated applications related to new school proposals, renewal and appeal processes, and Charter School Program grant allocations on behalf of charter school authorizers. Prior to becoming an independent consultant, Steve was a founding member of Wolcott School, a high school in Chicago for students with learning differences, as their first ever Director of Finance and Operations. Previously he worked in New York City as a corporate finance advisor and hedge fund analyst for eight years, specializing in mergers and acquisitions. He earned his Bachelor of Arts Degree in Engineering Sciences and Master of Education Degree from Harvard University.



The Gentlemen and Ladies STEM Academy

Review Committee Recommendation: **Deny**

Proposed School Name	Proposed School Focus	Proposed Region/Location
The Gentlemen and Ladies STEM Academy	STEM	Cordova

School Mission

The mission of the Gentlemen and Ladies STEM Academy to facilitate high performance of students in elementary and middle school and to equip them with foundational skills necessary for success in high school, college, career, and community.

School Plan Summary

The Gentlemen and Ladies STEM Academy (GLA) is proposing a K-8 public charter school in the Cordova region. GLA is a STEM school with a thematic focus on Science, Technology, Engineering and Math. The school’s philosophy is for students to acquire career sustaining skills through development of their intellectual capacities and scientific and technological acumen in a “Culture of Learning” environment.

Leadership and Governance

Full Name	Current Job Title and Employer	Position with Proposed School
Kenya Johnson, MBA	Self-Employed	Board Chair
Bernadine Lewis	Retired	Board Vice Chair:
Reginald R. Andrews, PharmD	Encompass Health Corp	Board Member
Terry Davis	Federal Express	Board Member
Rhonda Hooks, Esq.	Self-Employed	Board Member
Jamal Johnson, Esq.	Memphis Area Legal Services	Board Member
Phillip Lewis, PhD	Professor, Langston University	Board Member
Lisa K. Smith	AZZ, Inc	Board Member
Chair: Kenya Johnson, MBA	Self-Employed	Board Member
Vice Chair: Bernadine Lewis	Retired	Board Member
Reginald R. Andrews, PharmD	Encompass Health Corp	Board Member

Proposed Grade Structure and 5-year Enrollment Projections

Academic Year	Planned # of Students	Grades Served
2020-2021	505	K-8
2021-2022	650	K-8
2023-2024	790	K-8
2024-2025	830	K-8
2025-2026	865	K-8

Application Ratings and Comments by Section

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

Section/Rating	Strengths/Highlights	Concerns/Areas for Improvement
<p>Academic Plan Design and Capacity</p> <p><input type="checkbox"/> Meets or Exceeds</p> <p><input type="checkbox"/> Partially Meets</p> <p><input checked="" type="checkbox"/> Does Not Meet</p>	<p>The applicant appears to have an established connection with the Cordova community through the existing LeFlore Foundation.</p>	<p>The academic plan has significant gaps. Additionally, there is not a specific plan on how instructional practices will incorporate STEM-based educational practices. There was insufficient evidence of how students who may need to receive ELL services would be identified/assessed. The application includes limited details regarding development and implementation of IEPs in addition to an underdeveloped plan for supporting at-risk students.</p> <p>The application does not provide sufficient evidence of diverse marketing/recruitment methods that take into consideration families who have limited access social media (i.e. door-to-door outreach). There was no evidence of a plan to engage with non-English speaking families.</p> <p>The applicant does not make compelling case for why it should open a K-8 in the oversaturated Cordova/East/Gray's Creek community.</p> <p>Per SCS Board Policy #1011, Section VI, B. 5 – “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.” According to the most recent strategic regional analysis, the Cordova/East/Gray's Creek community has a current student capacity of 8,120 seats and 7,442 students enrolled in K-8; this means the East Neighborhood community is oversaturated in K-8 by 678 seats.</p>
<p>Operations Plan and Capacity</p> <p><input type="checkbox"/> Meets or Exceeds</p> <p><input checked="" type="checkbox"/> Partially Meets</p> <p><input type="checkbox"/> Does Not Meet</p>	<p>The startup plan adequately acknowledges key challenges.</p>	<p>The professional development plan for teachers is not sufficient or detailed enough to show that teachers without a STEM or PBL background would have the tools and training they need to execute this academic model. Additionally, the application does not adequately address staffing in the competitive teacher environment.</p>
<p>Financial Plan and Capacity</p> <p><input type="checkbox"/> Meets or Exceeds</p> <p><input checked="" type="checkbox"/> Partially Meets</p> <p><input type="checkbox"/> Does Not Meet</p>	<p>The Cash Flow Statement is clear, detailed, and easy to follow. The financial plan is sound with little to no outside funding.</p>	<p>The contingency plan is still missing. It is unclear how the school will adjust if they do not meet enrollment targets set in the budget. Additionally, the section did not include any information on the proposed financial policies and procedures aside from the outsourced back-office provider.</p>
<p>Performance Record (if applicable)</p> <p><input type="checkbox"/> Meets or Exceeds</p> <p><input type="checkbox"/> Partially Meets</p>	<p>N/A</p>	

<input type="checkbox"/> Does Not Meet		
Section	Summary of Application Supplement	
Application Supplement	<p>There is a need for K-5 seats in the East region but, at present, the region and the neighborhood (Cordova) is under-enrolled at the 6-8 Level.</p> <ul style="list-style-type: none"> • The proposed region (East) currently needs 485 seats at the K-5 Level and under-enrolled by 1,756 seats at the 6-8 Level • The proposed neighborhood (Cordova) currently needs 323 seats at the K-5 Level and is under-enrolled by 1,001 seats at the 6-8 Level. • At present, 78.4% of the K-8 seats in the proposed neighborhood (Cordova) are at a level '3' or above on the School Performance Scorecard for K-12 Level 	
Section	Summary of Financial Hardship & Impact	
Financial Hardship & Impact	<p>Expansion of charter schools imposes a cost on SCS – both directly and indirectly. It is also clear from Section 4 of the Fiscal Impact Report that the loss of operating funds caused by the transfer of BEP funds cannot be made up through a reduction in capital or facility costs or through the collection of an authorizer fee or lease agreements.</p> <p>The Gentlemen and Ladies STEM Academy fiscal impact on SCS includes:</p> <ul style="list-style-type: none"> • The District will lose approximately 505 to 865 students over a 5-year period; • Based on projected per pupil cost of \$9,319, including transportation costs, for Year 1 and increase to \$10,087, including transportation costs by Year 5, respectively; the District will transfer BEP funds of \$4,705,994 to \$8,725,228; • Fixed costs, such as electricity, custodial, etc., will be required regardless of reduced enrollment; • Variable costs, such as instructional materials, supplies, etc., associated with each student will increase or decrease directly proportionate to the number of students enrolled; • A large decline in enrollment may prompt reduction in teaching staff, but may not offset total loss of revenues. A reduction in operating costs will be necessary to reduce the loss of resources; • Maximum authorizer fee is \$35,000, which is not enough to recover the cost of additional services provided to the District; • Additional seats for the 6-8 band will become available within the Cordova community. 	