
BEFORE THE TENNESSEE STATE BOARD OF EDUCATION

IN RE:)
INTERNATIONAL ACADEMY OF EXCELLENCE) State Board of Education Meeting
Charter School Appeal) October 23, 2015
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FINDINGS AND RECOMMENDATION REPORT
OF THE EXECUTIVE DIRECTOR

Pursuant to Tenn. Code Ann. (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 August 21, 2015, Beyond the Border International (“Sponsor”), the sponsor of the proposed International Academy of Excellence (“IAE”), appealed the denial of their amended application by Metropolitan Nashville Public Schools (“MNPS”) 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 IAE application was not “contrary to the best interests of the pupils, school district, or community.”¹ Therefore, I recommend that the State Board affirm the decision of MNPS.

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 IAE amended application. 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.”² In addition, the State Board is required to hold a public hearing in the district where the proposed charter school seeks to locate.³

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

¹ T.C.A. § 49-13-108.

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

³ T.C.A. § 49-13-108.

school district or community.⁴ Because IAE is proposing to locate in an LEA that contains a school on the current or last preceding priority school list, the State Board has the ability to approve the application or to affirm the local board's decision to deny.

PROCEDURAL HISTORY

1. The Sponsor submitted its initial application for IAE to MNPS on April 1, 2015.
2. MNPS assembled a review team to review and score the IAE application. The review team recommended denial of the IAE initial application.
3. On June 23, 2015, MNPS Board of Education voted to deny the IAE initial application based upon the review team's recommendation.
4. The Sponsor amended and resubmitted its application for IAE to MNPS on July 23, 2015.
5. The MNPS review team reviewed and scored the amended application of IAE and again recommended denial.
6. On August 11, 2015, based on the review team's recommendation, MNPS Board of Education voted to deny the amended application of IAE.
7. The Sponsor appealed the denial of the IAE amended application in writing to the State Board on August 21, 2015. The notice of appeal included all required documents with the exception of the required timeline per State Board Policy 2.500.
8. On August 24, 2015 the Sponsor was notified that a summary of the application timeline as required by State Board Policy 2.500 was not submitted and was given until the end of the day to submit one. The Sponsor submitted the timeline by the deadline.
9. At the time of appeal to the State Board, the Sponsor did not submit corrections to the amended application as allowed under T.C.A. § 49-13-108(a)(4)(C).
10. On August 24, 2015, the State Board sent a letter requesting that MNPS provide information regarding its denial of the IAE amended application.
11. The State Board's Review Committee analyzed and scored the IAE amended application using the Tennessee Department of Education's charter application scoring rubric.
12. The Review Committee conducted a capacity interview with the proposed governing board of IAE, along with key members of the leadership team, on September 28, 2015 in Nashville.

⁴ Id.

13. After the capacity interview, the Review Committee completed a final rating of the IAE amended application and provided the Review Committee Recommendation Report.
14. On September 29, 2015, the State Board Executive Director and staff held a public hearing in Nashville. At the public hearing, the Executive Director heard presentations from the Sponsor and MNPS and took public comment regarding the IAE application.
15. On October 6, 2015 the Sponsor submitted documentation to the State Board's offices, which appeared to make corrections to and/or supplement the application submitted on appeal.
16. The Sponsor was notified via letter dated October 7, 2015 that the documentation could not be considered by the Review Committee as part of its review of the amended application because corrections to the amended application are not permitted after the appeal deadline.⁵

FINDINGS OF FACT

- **District Denial of Application.**

The review team assembled by MNPS to review and score the IAE initial and amended applications consisted of the following individuals:

Name	Title
Mary Laurens Seely	Coordinator of Data Coaches, MNPS
John Thomas	School Improvement Program Facilitator, MNPS
Diane Chumley	Coordinator ELD Curriculum, MNPS
Sharon Wright	Executive Lead Principal, MNPS
Rick Caldwell	Exceptional Education Coach, MNPS
Kate Ezell	Principal, Ezell Education Consulting
Lovette Curry	Executive Director of Nashville Community Education
Adrienne Useted	COO, LEAD Public Schools
Jill Peoples	Coordinator of Magnet Marketing and Recruiting, MNPS
Dr. Sudhir Sinha	Data Coach, MNPS
Manny Ehiemua	Community Outreach Specialist, MNPS
Amy Hunter	Director of Math Instruction, LEAD Public Schools

The IAE initial application received the following ratings from the MNPS review team:

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
Capacity Analysis Summary	Does Not Meet Standard

⁵ State Board Policy 2.500; T.C.A. § 49-13-108(a)(4)(C).

After the MNPS review team completed its review and scoring of the initial application, its recommendation was presented to the MNPS Board of Education on June 23, 2015. Based on the review team’s recommendation, the MNPS Board of Education voted to deny the initial application of IAE.

Upon resubmission, the amended application received the following ratings from the MNPS review team:⁶

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
Capacity Analysis Summary	Does Not Meet Standard

After the MNPS review team completed its review and scoring of the amended application, its recommendation was presented to the MNPS Board of Education on August 11, 2015. Based on the review team’s recommendation, the MNPS Board of Education voted to deny the amended application of IAE.

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

Following the denial of IAE and their subsequent appeal to the State Board, SBE staff assembled a diverse Review Committee of experts to evaluate and score the IAE amended application. This review committee consisted of the following individuals:⁷

Name	Title
Jimmy Hopper	Teacher, Valor Collegiate Academy
Nathan James	Director of Legislative Affairs, State Board of Education
David Mansouri	Executive Vice President, State Collaborative for Reforming Education (SCORE)
Danielle Mezera	Assistant Commissioner of Career and Technical Education, Tennessee Department of Education
Kaitlin Reynolds	Assessment and School Transition Manager, Achievement School District
Angela Sanders	General Counsel, State Board of Education
Tess Stovall	Director of Charter Schools, State Board of Education

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

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

⁶ Please see EXHIBIT B for a copy of the MNPS review team report.

⁷ Please see EXHIBIT A for detailed bios of each review committee member.

Financial Plan and Capacity	Does Not Meet Standard
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The Review Committee recommended that the application from IAE be denied because the application lacked significant evidence throughout the academic, operational, and financial plan of a realistic, sound, and viable program, which would result in a high quality school option. With regard to academic plan design and capacity, there was insufficient evidence that the academic plan was viable, as the focus did not contain a clear and comprehensive explanation, or was informed by current practice. The assessment plan was underdeveloped and lacked critical detail on how the school would collect, analyze, and use student data. The plan for serving special populations did not provide evidence of the instructional strategies and programs that the school would use to educate students or a reasonable recruitment plan for how the applicant planned to hire qualified personnel.

The Review Committee found that the operations plan did not contain a strong governance plan for the proposed school or a realistic start-up plan. The composition of the proposed governing board did not align between the application and the interview, and the application lacked key governing board documents as well as contained an insufficient conflict of interest policy. The start-up plan was not thoroughly detailed and relied on a revenue source that was unconfirmed and not guaranteed. Further, the application did not present a comprehensive recruitment and evaluation plan for the high quality teachers that the school expects to employ as staff.

With regard to the financial plan, the Review Committee found a significant lack of evidence to demonstrate a sound and viable financial plan. The financial plan relies substantially on an unconfirmed revenue source, and the budget narrative includes incomplete and inaccurate cost assumptions. The Sponsor lacked critical financial expertise on its governing board and leadership team, and the Sponsor did not complete the correct and current budget form, which made it difficult to analyze the financial information. Overall, the Review Committee found that the academic, operational, and financial plans lacked critical evidence, depth, and detail, and the capacity interview with the Sponsor did not provide further clarification that would have resulted in a higher rating.

For additional detail 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 Statute,⁸ and State Board policy 2.500, a public hearing chaired by the Executive Director was held in Nashville on September 29, 2015. MNPS’ presentation at the public hearing focused on the argument that the denial of the IAE amended application was in the best interests of the students, school district and community. MNPS argued that that the application was rated as “does not meet” in every section of the state’s rubric and that “approval of this application would require a tremendous risk grounded in the unproven hope that the people involved will figure out important details as they go. No one would suggest that a school district should enter into contracts with service providers this way.”⁹

In response, IAE’s presentation focused on the fact that they live in and are part of the community that they are proposing to serve. The Sponsor described their school as a small, community-oriented

⁸ T.C.A. § 49-13-109.

⁹ MNPS Public Hearing Presentation.

school that does not see itself as a business. The Sponsor also discussed their plan for a facility as well as a plan to provide transportation to students by contracting with MNPS.

A portion of the public hearing was dedicated to taking public comment. However, no public comments were made at the hearing. In addition, State Board staff accepted public comments in writing via e-mail.¹⁰

ANALYSIS

State law requires the State Board to review the decision of the local board of education and determine whether the denial of the proposed charter school was in the “best interests of the pupils, school district, or community.”¹¹ In addition, T.C.A. § 49-13-108 requires the State Board to adopt national standards of authorizing. One such standard is to maintain high standards for approving charter applications. In making my recommendation to the Board, I have considered the Review Committee Report, the arguments made by both IAE and MNPS 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 sound and grounded in evidence contained in the application and gained at the capacity interview. For the reasons explicated in the report, I agree that the IAE amended application did not rise to the level of meeting or exceeding the standards required for approval.¹²

Given the great responsibility of educating students and the amount of taxpayer dollars entrusted to a charter school that is approved by a local district, the State Board expects that only those schools that demonstrate a high likelihood of success and meet or exceed the required criteria in all areas will be authorized. While it appears that the Sponsors of the IAE application are a dedicated group who wish to serve the students in their community, I agree with MNPS that significant concerns remain about the ability of the Sponsor to successfully open and operate a school that will improve academic outcomes for all students.

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 International Academy of Excellence was contrary to the best interests of the students, the school district, or the community. Therefore, I recommend that the State Board of Education affirm the decision of the MNPS Board of Education.

¹⁰ Copies of written public comments received by the deadline have been provided to State Board members.

¹¹ T.C.A. § 49-13-108.

¹² In addition, not only did the SBE Review Committee find that IAE’s amended application did not meet the standard in any area, it is also worth noting that the Sponsor of IAE failed to submit the correct charter school application and budget form.



Dr. Sara Heyburn, Executive Director
State Board of Education

10/20/2015

Date

EXHIBITS

- **Exhibit A:** State Board of Education Review Committee Report and Reviewer Bios
- **Exhibit B:** MNPS Review Team Final Recommendation Report



EXHIBIT A

Charter Application Review Committee Recommendation Report

October 23, 2015

School Name: International Academy of Excellence Charter School

Sponsor: Beyond the Border International

Proposed Location of School: Metropolitan Nashville Public Schools

Evaluation Team:

Jimmy Hopper
Nathan James
David Mansouri
Danielle Mezera
Kaitlin Reynolds
Angela Sanders
Tess Stovall

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

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

Overview of the Evaluation Process

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

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

This recommendation report includes the following information:

1. **Summary of the application:** A brief description of the applicant's proposed academic, operation, 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; school development; academic focus and plan; academic performance standards; high school graduation standards (if applicable); assessments; school calendar; 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 LEAs when evaluating an application. The rubric states:

[A]n 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 to the overall mission, budget, and goals of the application.

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

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



Summary of the Application

School Name: International Academy of Excellence Charter School

Sponsor: Beyond the Border International

Proposed Location of School: Metropolitan Nashville Public Schools

Mission:¹

The mission of International Academy of Excellence is to cultivate in our students the academic and character skills needed for them to succeed in middle school, high school, college and life beyond.

Proposed Enrollment:²

Grade Level	Year 1 (2015-16)	Year 2 (2016-17)	Year 3 (2017-18)	Year 4 (2018-19)	Year 5 (2019-20)	At Capacity (2019-20)
K	100	100	100	100	100	100
1	N/A	100	100	100	100	100
2	N/A	N/A	100	100	100	100
3	N/A	N/A	N/A	100	100	100
4	N/A	N/A	N/A	N/A	100	100
Total	100	200	300	400	500	500

Brief Description of the Application:

International Academy of Excellence is an elementary school proposing to locate in Nashville, Tennessee and serve students in grades Kindergarten through 4th grade. The school plans to utilize a blended learning instructional model. The school will focus on creating a positive school culture through instruction with a social and emotional learning focus.³

International Academy of Excellence will be organized as a non-profit entity and will be governed by a nine member governing board with the school’s proposed executive director reporting to the governing board.⁴ The school proposes to locate in southeast Davidson County with a focus on the Overton and Glendcliff clusters.

International Academy of Excellence projects to have \$1,240,400 in revenue in Year 1 and \$1,231,526 in expenses in Year 1, resulting in a positive fund balance of \$8,874. In Year 5, the school projects to have \$5,584,733 in revenue and \$4,333,013 in expenses, resulting in a positive fund balance

¹ International Academy of Excellence Amended Application, pg. 1.

² Ibid, pg. 6.

³ Ibid, pg 4.

⁴ While the proposed bylaws provided by International Academy of Excellence indicate an intention to be a non-profit entity, the application did not include the articles of incorporation or the proof of non-profit and tax-exempt status.

of \$1,251,720.⁵ The school assumes that 80% of the student population will qualify for Free and Reduced Price Lunch and 10% of the student population will be students with disabilities.⁶

Summary of the Evaluation

The review committee recommends that the application from International Academy of Excellence be denied because the applicant lacked significant evidence throughout the academic, operational, and financial plan of a realistic, sound, and viable program, which would result in a high quality school option. With regard to academic plan design and capacity, there was insufficient evidence that the academic plan was viable, as the focus did not contain a clear and comprehensive explanation, or included current statewide standards or assessments. The assessment plan was underdeveloped and lacked critical detail on how the school would collect, analyze, and use student data. The plan for serving special populations did not provide evidence of the instructional strategies and programs that the school would use to educate students or a viable recruitment plan for how the applicant planned to hire qualified personnel.

The operations plan did not contain a strong governance plan for the proposed school or a realistic start-up plan. The composition of the proposed governing board did not align between the application and the interview. The application lacked key governing board documents⁷ as well as contained an insufficient conflict of interest policy. The start-up plan was not thoroughly detailed and relied on a revenue source that was unconfirmed and not guaranteed. The school did not present a comprehensive recruitment and evaluation plan for the high quality teachers that the school expects to employ as staff.

The review committee found a significant lack of evidence to demonstrate a sound and viable financial plan. The financial plan relies substantially on an unconfirmed revenue source, and the budget narrative includes incomplete and inaccurate cost assumptions. The applicant lacked critical financial expertise on its governing board and leadership team, and the applicant did not complete the correct and current budget form, which made it difficult to analyze the financial information. The review committee found that the academic, operational, and financial plans lacked critical evidence, depth, and detail, and the capacity interview with the applicant did not provide further clarification that would have resulted in a higher rating. Therefore, the review committee recommends that the International Academy of Excellence application be denied.

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,”⁸ 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.

⁵ The revenue and expense estimates were pulled directly from International Academy of Excellence Charter School’s Five Year Planning Budget, but the estimates for Year 1 do not match what was provided in the budget narrative contained within the application. Therefore, we are unable to verify these estimates and calculations.

⁶ Ibid, pg. 188.

⁷ The application did not include the Articles of Incorporation or the Proof of Non-Profit Status.

⁸ Tennessee Charter School Application – Sample Ratings and Scoring Criteria, pg. 1.



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

Analysis of the Academic Plan Design and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee:

The Academic Plan Design and Capacity section does not meet the standard because the applicant lacked significant evidence of a viable academic plan that would result in a high quality school for students upon implementation. While the proposed leadership team and governing board members have vast experience within education and are passionate about serving the community of southeast Nashville, there was insufficient evidence that the academic plan was viable and would result in the academic growth of all students. The applicant failed to present an academic focus that was clear and comprehensive, included current statewide standards and assessments, and demonstrated experience to implement the plan. The assessment plan presented lacked depth and detail around how the school would collect, analyze, and use data to inform instruction. The applicant's plan for serving students with disabilities and English Language Learners did not contain specific strategies or programs for educating students. Overall, the Academic Plan Design and Capacity section did not meet the standard in the majority of the required criteria.

The application lacked a clear and comprehensive explanation of the academic focus that was grounded in research, supported by an appropriate staffing plan, and included a demonstrated capacity for high quality implementation. The applicant states in the beginning of the application that the main instructional model of the school will be blended learning, but throughout the remainder of the application and in the interview, the applicant did not provide sufficient detail of how the blending learning program would be implemented within the school. When asked by the review committee to describe what a classroom will look like with the blending learning approach, the applicant described a staffing scenario that was inconsistent with the financial plan presented. Additionally, the applicant did not articulate how the school would sufficiently ramp-up technology and infrastructure to support the blended learning model in the application or in the interview.

Throughout the academic plan, the applicant lacked critical details around the instructional strategies or curriculum that the school will utilize to achieve the school's mission. In numerous instances, the applicant used outdated references such as Common Core and PARCC without any acknowledgement that the state transitioned away from these items well prior to when the application was submitted. The applicant states that students will receive instruction in Spanish as well as Chinese, Japanese, or Arabic, but there is no additional scheduling or staffing evidence presented as to how this language instruction will work with the academic plan. The applicant did not provide a robust and quality overview of the math curriculum to be used within the school. When asked to describe the math curriculum for the school in the interview, the applicant did not provide any additional details to the review committee and stated that they hoped to hire an instructional leader with curriculum and instruction experience to lead this work. The leadership team and governing board members demonstrated that they collectively had significant experience within education, but they acknowledged that they needed to recruit members of the leadership team with elementary school experience. The lack of evidence of demonstrated knowledge and experience with the elementary school grade structure as well as the lack of evidence of instructional strategies and curriculum resulted in the applicant not meeting the required criteria for the academic focus.

Within the application, the assessment plan presented did not contain the depth and sufficient evidence to demonstrate how the applicant will collect, analyze, and use student data to inform the

classroom instruction. The application does not contain any specific assessments that the school plans to utilize, and when the review committee asked about the assessment plan in the interview, the leadership team was not able to articulate a comprehensive plan. The leadership team's responses regarding the assessment plan were vague, confusing, and not grounded in developmentally appropriate testing for students in elementary school. The leadership team and governing board members did not clearly articulate how they would monitor and track student progress prior to students taking the TCAP assessment in 3rd grade. Overall, the review committee did not find sufficient evidence that the application met the required criteria within the assessment section or evidence of the capacity to execute the assessment plan.

The applicant's plan for serving students with disabilities, at-risk students, and English Language Learners was underdeveloped and lacked viability to provide these students with appropriate instructional programs, practices, and strategies. When the review committee asked about instructional strategies for educating students with disabilities, the applicant stated that they liked the inclusion approach but did not provide any additional details, evidence, or information about how inclusion would be implemented within the school. The leadership team provided a lot of detail during the interview of how it would support the medical needs of students with disabilities such as ensuring there was a nurse on staff and providing for hearing, vision, occupational therapy and physical therapy services, but there was no information included about how the school would fund these services or how the school would educate the students. Additionally, the applicant provided minimal details regarding the school's approach for English Language Learners, and the plan presented within the application was disjointed and lacked overall coherence. When the review committee asked the leadership team to describe their plan for hiring qualified instructors, the applicant stated that there were a number of members of the leadership team and governing board who spoke multiple languages, and they would be able to sufficiently communicate with students in a variety of languages. However, the applicant did not articulate the recruitment method for EL certified teachers or demonstrate evidence of a realistic plan for hiring licensed and high quality personnel. In totality, the review committee found evidence that the plan for serving special populations lacked depth and detail and did not meet a significant number of required criteria for a robust plan.

Overall, the review committee found a lack of coherence, clarity, and details within the Academic Plan Design and Capacity section. The school development subsection was missing from the application, many subsections were out of order, and topics were covered across numerous sections. Additionally, the applicant mistakenly mentions another charter school in the application, but it is unclear if the applicant is using the other charter school's previous application as a basis for the current application or if they are utilizing it as a best practice. Overall, the presentation of the academic plan did not provide evidence of the capacity to execute the academic plan as presented.

Analysis of the Operations Plan and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee:

The Operations Plan and Capacity section does not meet standard because the application lacks critical details in the proposed governance, start-up, facilities, recruitment, retention, and evaluation subsections. The governance structure lacked critical detail and alignment within the application, and the leadership team provided conflicting and confusing information during the capacity interview regarding the proposed governing body of the school. The start-up plan within the application lacked depth and viability with a start-up capital funding source that is not available and insufficient evidence regarding the proposed facilities plan. The plan for recruiting, retaining, and evaluating teachers lacked significant clarity and details and changed between the application and the interview. In totality, the review team did not find evidence that the operations plan met the required criteria for a higher rating.

The governance structure presented in the application does not meet standard because it lacked critical details regarding the size and composition of the governing board, foundational governance documents, and preventing conflicts of interest. In the application, the governing board has seven current board members listed, but the resumes of three of the seven members are not included in the application as required. When the review committee asked about the current compensation of the governing board, the applicant gave confusing and conflicting information as to who is currently a governing board member and who is no longer on the board. During the interview, the applicant stated at one point that the school had five founding governing board members and another point that it had eight founding governing board members. The changing nature of the governing board composition did not provide evidence of a strong understanding of the roles and responsibilities of a governing board as required in the rubric.

Additionally, the application did not include key governing board documents. The Articles of Incorporation or Proof of Non-Profit Status for the organization were not included in the application nor was there a discussion as to why these documents were not included. The applicant did not articulate a thorough conflict of interest policy for the governing board and how it would minimize any conflict of interest between the governing board chair, Mrs. Barbara Floyd, and the proposed executive director, Dr. Kori Floyd. When the review committee raised the issue, the applicant stated that as long as the relationship was disclosed they saw no problem with it. However, the review committee did not find sufficient evidence of a strong understanding of the roles and responsibilities of a governing board and a plan to ensure meaningful oversight of the school.

The application did not present a compelling and viable plan for the development of the school from post-approval to opening. The start-up plan included within the application does not provide a thorough description of the start-up activities, the team members responsible for implementing the plan, or sufficient and viable start-up capital. During the interview, the applicant articulated that during the start-up year the school would hire the lead administrator, acquire technology and furniture, and complete classroom renovations. However, within the application, the applicant has allocated \$15,000 in expenses during Year 0 with the charter school start-up grant from the Department of Education as the primary funding source. When the review team asked about the contingency funding plans since the charter school start-up grant is not guaranteed, the leadership team stated that they would rely on lines of credit. Yet, there was no documentation provided to demonstrate evidence of the viability of this capital. The review committee did not find evidence of a compelling and comprehensive start-up plan or the capacity to implement the plan.

The application does not present a facilities plan that is reasonable and sound based upon what is presented in the application and what was discussed within the capacity interview. The application states that the school will lease office space within the Glencliff cluster, and it is looking at two potential locations for the facilities including an office complex and an indoor soccer facility. Within the capacity interview, the leadership team stated that their first priority option was to utilize space within the indoor soccer complex, and they stated that the building's owner has agreed to take on the cost of renovations to make the facility suitable for the school. However, the letter of support contained within the application from the facility owner does not mention any agreement regarding the use of or renovations of the facilities. Therefore, the review committee did not find sufficient evidence of a sound plan and timeline for a facility within the application.

The personnel and human capital plan lacked overall coherence, clarity, and depth. The applicant plans to staff the school with bilingual teachers, but the applicant did not provide evidence of a strong recruitment and hiring strategy to staff the schools with these difficult-to-staff positions. The applicant plans to rely heavily on their existing networks to recruit individuals to fill these positions and has confidence that within the networks are sufficient pools of qualified individuals, but the review committee did not find strong evidence that the recruitment strategy would be effective given the competitive nature of the positions they are recruiting for. Additionally, the evaluation plan for the staff lacked depth and clarity both within the application and within the interview. The application requests a waiver from the state evaluation model, but the application does not detail what evaluation model the school will utilize for evaluating its teachers. When the applicant was asked about the planned evaluation model in the interview, the applicant provided conflicting and contradictory information. The applicant stated that it would adopt the evaluation model currently being used by the LEA in Year 1, and then it would move to a new model in Year 2. However, the applicant did not provide a detailed description of how it would develop the new evaluation model, what resources it would utilize in developing the model, and how it would collect feedback from staff. The review committee did not find evidence of a strong plan for supporting, developing, and annually evaluating teachers aligned with statewide evaluation requirements.

Analysis of the Financial Plan and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee:

The Financial Plan and Capacity section does not meet the standard because the budget model presented is not complete, realistic, and viable, the financial plan includes unrealistic cost assumptions for implementation of the proposed model, and the applicant lacks collective qualifications for implementing the financial plan successfully. As described in the operations plan section, the school relies significantly on the charter school start-up grant from the Department of Education for start-up year funding as well as funding in the first two years of the school's operation. In totality, the school relies on \$500,000 of start-up grant funding to cover a significant amount of expenses, but the start-up grant availability was uncertain at the time of submission of the application as Tennessee's start-up grant has expired. The applicant's plan to rely significantly on unconfirmed revenue does not demonstrate evidence of a reasonable and sound financial model. Additionally, the applicant's budget for the start-up year understates the potential costs necessary to open the school including purchasing of technology, furniture, materials, the hiring of key staff, and facility renovations. The \$15,000 budgeted for start-up expenses is not reasonable or viable based on the start-up plan provided in the budget.

The financial plan includes inaccurate or incomplete cost assumptions. The application states that the instructional model will rely heavily on a blended learning program, but the budget narrative does not account for any technology purchases for students including laptops, iPads, or other handheld devices. The budget includes the cost of purchasing one bus per year for a total of five buses by Year 5. However, this information contradicts with what was provided within other parts of the application and the interview in which the applicant stated that they planned to contract with the local school district for all transportation needs. The applicant also includes a plan to hire a vendor to conduct all of the back-of-the-office financial procedures, and the budget includes an annual \$60,000 allotment to this vendor. However, the application neither includes a service agreement or terms and conditions with the vendor nor a plan for how the vendor will be held accountable by the governing board. The revenue and expenses estimates between the budget narrative and budget document do not align for Year 1, and it is unclear where the misalignment is and how the school calculated these figures.

The application does not provide compelling evidence of the collective qualifications for implementing the financial plan successfully. Although the proposed governing board members have clear experience within the education field, there is a lack of financial expertise on the governing board and leadership team. Additionally, the applicant completed an incorrect and outdated budget form, which made reviewing and analyzing the budget very difficult. The budget document provided in its current form lacks key information such as student enrollment estimates, demographic estimates, staffing estimates, operational expense estimates and per pupil funding estimates in a format that is easy to analyze and review. In totality, the review committee did not find evidence of capacity to implement the financial plan or a financial plan that was realistic and viable to operate the proposed school.



Evaluation Team

Jimmy Hopper is a proud Texan who graduated from Texas Christian University with a B.A. in History. After graduation, Mr. Hopper worked for the House Committee on Education and the Workforce in the United States House of Representatives. He moved to Nashville to join Teach For America in 2011 and has since served in various leadership roles with TFA's summer teaching training programs, including a most recent position of School Director at McGavock High School. Mr. Hopper also completed his M.Ed. in Instructional Practice from Lipscomb University and was selected for a school leadership fellowship, through which he analyzed best practices from schools across the country. Mr. Hopper previously taught in Cheatham County, where he co-led an effort in the county to open the state's first rural charter school. While teaching, he taught nine different subjects, served as the facilitator the school's Data Team, and served as department chair. Along with another teacher, Mr. Hopper authored the charter for a new school in Cheatham County, and his team worked alongside parents and community leaders to envision what is possible for students. While the district chose not to move forward with the charter at this time, Mr. Hopper and the team are proud of the change that has resulted from the effort — the district has adopted several components of their model and applied them across their schools. Currently, Mr. Hopper is honored to serve as the Founding 6th Grade Social Studies teacher at Valor Voyager Collegiate Academy. He is also a content lead and 6th grade-level chair. In Mr. Hopper's spare time, he loves cooking with his wife (he can't actually cook, but he likes to take credit for her work), reading biographies, and watching TCU Horned Frog football.

Nathan James lives in Mt. Juliet, Tennessee with his wife of 13 years, Carla, and their two children, George and Thomas James. He works as the director of Legislative Affairs with the Tennessee State Board of Education, having come to the position from Louisiana where he served as The Policy Advisor to Governor Bobby Jindal for Education and the Workforce. While in that capacity he served on 6 boards and commissions as the Governor's representative and was responsible to the governor for the coordination of K-12, higher education, and labor and workforce policy. Mr. James served the Tennessee Senate as a clerk and legislative assistant from 1998-2002 and as research analyst to the Senate Education Committee from 2008 until 2013. During the intervening years he worked for the U.S. House of Representatives, owned his own ice cream shop, and served as the advocacy director for the American Heart Association. While Mr. James was serving as president of CHART (the Campaign for a Healthy and Responsible Tennessee) in 2007, this organization led a long media and lobbying campaign culminating in Tennessee became the first tobacco state to go smoke free. Mr. James is a Freemason, a Paul Harris Fellow, and has served as a Republican State Executive Committeeman. He is a retired Colonel in the Tennessee State Guard, and a member of the Interstate compact on Educational Opportunities for Military Children by Governor Haslam's appointment. He holds a BS in History and Political Science from Lambuth University and an MPA from Tennessee State University.

David Mansouri is the Executive Vice President at the Tennessee State Collaborative on Reforming Education (SCORE). SCORE is a non-profit advocacy and research organization focused on preparing Tennessee's students for college and the workforce, and was founded by former U.S. Senate Majority Leader Bill Frist. Prior to his current role, Mansouri served as the organization's Director of Advocacy



and Communications, overseeing statewide advocacy initiatives and strategic communications efforts focused on ensuring that students in Tennessee graduate high school prepared for college and the workforce. Before joining SCORE, Mansouri worked in public relations and political consulting, providing clients and candidates with campaign consulting, issue advocacy work, and public affairs and communications strategy. Earlier, he worked for U.S. Senator Fred Thompson and at the Tennessee Republican Party. In addition to his work at SCORE, Mansouri serves as the Chair of the Board of Directors of Nashville Classical Charter School, a public elementary school in East Nashville whose mission is to prepare every child — no matter his or her starting point — for college. A Tennessee native, Mansouri is a graduate of Rice University and received an MBA with honors from Vanderbilt University's Owen Graduate School of Management.

Danielle Mezera assumed the position of Assistant Commissioner for Career and Technical Education (CTE) for the Tennessee Department of Education in January 2012. In February 2015, she assumed an expanded role and new title as the department's Assistant Commissioner for College, Career and Technical Education. As Assistant Commissioner, Danielle oversees the department's focus on developing and promoting strong high school strategies that lead to the promotion of a more educated and skilled citizenry in Tennessee. Additionally, she serves as the state director for CTE and facilitates the state's robust portfolio of early postsecondary courses. Her division also serves as lead state agency for Pathways Tennessee as a member of the national Pathways to Prosperity Network. Prior to assuming her current role, Danielle served as Director of Children and Youth for the Mayor's Office of Nashville & Davidson County Government. In that position, she served as Mayor Karl Dean's chief education policy advisor and oversaw matters pertaining to the education, health, and well-being of Davidson County's children (0-21 years of age). Before entering public service, Danielle served as a director at the Vanderbilt Institute for Public Policy Studies. During her tenure at Vanderbilt University, she held various senior level positions in university administration. Danielle holds a B.A., M.Ed., and Ph.D. in education.

Kaitlin Reynolds currently serves as the Assessment and School Transition manager at Tennessee's Achievement School District (ASD), where she oversees all district- and state-required assessments, as well as the process for onboarding all new schools and exiting all underperforming schools from the district. Prior to the ASD, Kaitlin worked in education research, substitute taught in all grades, and served as an AmeriCorps VISTA. Kaitlin has degrees in English (BA) and Education Policy (MPP) from Vanderbilt University.

Angela Sanders serves as the General Counsel for the Tennessee State Board of Education. In this role, she advises board members and staff on all legal matters relating to public K-12 education in Tennessee. Ms. Sanders works closely with the Director of Charter Schools to manage the charter school appeals and authorization process. She also prepares board-approved rules and regulations for review by the Attorney General and filing with the Secretary of State and provides interpretation of Board policies and rules to internal and external stakeholders. Prior to joining State Board staff, Ms. Sanders was an Associate Attorney in the Nashville office of Lewis, Thomason, King, Krieg & Waldrop, P.C., working primarily in the Education Law and Business Law practice groups. In this role, Ms. Sanders advised and represented education clients in a variety of legal matters and litigation including employment issues



related to licensed and classified employees, employee and student discipline, employee and student rights, special education and disability accommodations, civil rights matters, tort liability and first amendment issues. Ms. Sanders graduated Magna Cum Laude from Saint Louis University School of Law and received her Bachelor's Degree in Communication from the University of Tennessee, Knoxville, Summa Cum Laude.

Tess Stovall serves as the Director of Charter School Accountability and Policy for the Tennessee State Board of Education. In this role, she manages the charter school application process and authorization duties of the State Board. Prior to joining the staff of the board, she served as the Transformation Facilitator at Cameron Middle School, the first district-led conversion of a traditional public school to a charter school in Metropolitan Nashville Public Schools. While in Washington, DC, Tess worked for Congressman Jim Cooper (TN-05) and a centrist think tank, Third Way, on economic and education policy. She is a Phi Beta Kappa graduate of The George Washington University earning a Bachelor of Arts Degree in Political Science and Sociology and a graduate of the London School of Economics with a Master of Science Degree in Political Sociology. Tess is a member of the National Association of Charter School Authorizers' 2015 Leaders Program.

EXHIBIT B

International Academy of Excellence



Metropolitan Nashville Public Schools Office of Innovation

Charter School Application Recommendation Report

International Academy of Excellence

Submitted by: Beyond the Border, Inc.

Evaluation Team

Mary Laurens Seely, Coordinator of Data Coaches, MNPS, Team LEAD

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9. Dr. Sudhir Sinha, Data Coach, MNPS, Sudhir.sinha@mnps.org
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11. Amy Hunter, Director of Math Instruction, LEAD Public Schools, ahunter@leadpublicschools.org

Introduction

Charter schools are public schools operated by independent, non-profit governing bodies that are granted greater autonomy in the areas of curriculum, calendar, staffing, methodology, and pedagogy in return for greater accountability in achieving high quality academic results with their students. In Tennessee, public charter school students are measured against the same academic standards as students in other public schools and are required to use the same state-approved assessments as all other public schools. Charter schools are required to serve all eligible students, with the education of at-risk students being of utmost importance.

It is the responsibility of the authorizer to create and apply a rigorous, fair and thorough authorization process in order to ensure only those charter schools who can offer and sustain high quality educational options for all students are recommended and approved to open. Metropolitan Nashville Public Schools is interested in charter applicants who demonstrate the capacity to educate the most at-risk students in highly diverse and personalized settings.

Charter schools in Nashville are required to provide appropriate curriculum, aligned professional standards, engaging models of parental and partnership programs, and strategic planning to leverage and grow resources for the school. Schools are held accountable for academic results, responsible school leadership, sound fiscal and operational management and adherence to the laws and rules that govern education in the state of Tennessee.

Evaluation Process

The Office of Innovation, Division of Charter Schools, has worked closely with the National Association of Charter School Authorizers (NACSA) to set up an evaluation process that embodies best practices from authorizers throughout the country and is rigorous and thorough. The MNPS process has gained both state-wide and national recognition as rigorous, thorough, fair and impartial.

In accordance with the NACSA Principles and Standards, three review teams were assembled to review the April, 2015 applications. Each team consisted of a team lead plus individuals who had expertise with curriculum, special education, English language learners, charter school financials, operations, management and legal. Each team was given extensive training in application review and interviewing techniques.

The Office of Innovation and one MNPS board representative exercised additional oversight of the process.

The stages of review are as follows:

Phase I - Capacity Review

Charter applications are thoroughly reviewed to insure sufficient strength in areas of Education Plan, Organization Plan and Business/Financial Plan, as described below:

- **Proposal Overview**

Basic information about the proposed school

- **Evaluation**

Analysis of the proposal based on the three major areas of plan development

- **Academic Plan** - including Mission, Vision, Executive Summary and Educational Philosophy; Curriculum and Instruction, Target Population, School Calendar and Daily Schedule; Special Student Populations (exceptional education and English Language Learners); School-specific goals and objectives, Assessment; School Climate and Discipline; and Prior Success in Raising Student Achievement
- **Operations Plan** - Includes governing body; governing board composition; governance structure; management and operations; staffing; Human Resources; Professional Development; Student Recruitment and Enrollment; and Community Involvement.
- **Financial/Business Plan** - Including budget assumptions, five year budget and first year start-up budget; Financial Management; Transportation/Food Service/Other Partnerships; Insurance; and Pre-Opening Plan, payroll, fundraising, compliance with state and federal reporting requirements
- **Final Capacity Analysis Summary** - Review and recap of all three areas - academic, operations, and financial - with emphasis on the reasons for recommending approval or denial

Opening a successful, high-performing charter school depends on having a complete, coherent plan. It is not an endeavor for which strength in one area can compensate for weakness in another. Therefore, in order to receive a recommendation for approval, the application must meet or exceed the criteria in all three areas of the capacity review in order to move forward to the next phases of consideration.

Phase II - Absolute Priorities

If an application meets standard in all four (4) areas of the capacity review, it then moves to Phase II. The application must meet both absolute priorities of strong academic benchmarks and diversity plan that aligns with the MNPS Board of Education diversity goals. A separate diversity plan submitted by applicants will be evaluated for recruiting plans, transportation, facility acquisition and recruitment strategies to discern whether an applicant meets diversity standards. An application that does not meet both absolute priorities in Phase II will not move forward in the application process.

Phase III - Competitive Priorities

Once applications have been ranked by tier-level according to their competitive priority ranking, and the district's annual needs assessment plan report is complete, the Office of Innovation in consultation with Student Assignment, Diversity Management, and the Director's Office will consider and make recommendation for investment in new schools matched to identified needs of the district.

Proposal Overview

School Name International Academy of Excellence

Mission and Vision: The mission of the International Academy of Excellence is to provide a quality education in a safe learning environment for and linguistically diverse student population. The International Academy of Excellence will blend academic rigor with character building and cultural awareness to enable its students to thrive within a global society.

Proposed location: Southeast Davidson County

Enrollment Projections (to be copied from the table in the Proposed Overview & Enrollment section)

<i>Academic Year</i>	<i>Planned # of Students</i>	<i>Maximum # of Students</i>	<i>Grades</i>
<i>Year 1</i>	100	100	
<i>Year 2</i>	200	200	K, 1
<i>Year 3</i>	300	300	
<i>Year 4</i>	400	400	K-3
<i>Year 5</i>	500	500	
<i>Year 6</i>	500	500	K-4
<i>Year 7</i>	500	500	
<i>Year 8</i>	500	500	K-4
<i>Year 9</i>	500	500	
<i>Year 10</i>	500	500	K-4
<i>At Capacity</i>	500	500	

RECOMMENDATION

Recommendation

School Name: **International Academy of Excellence**

Summary of Section Ratings

Ratings options for each section are Exceeds the Standard; Meets the Standard; Partially Meets the Standard; Does Not Meet the Standard.

Phase I Capacity Review

Amended Application

Academic Plan

Academic Plan

Does Not Meet Standard

Does Not Meet Standard

This includes the entire plan for the academic program including at-risk and ELL students

Operations Plan

Operations Plan

Does Not Meet Standard

Does Not Meet Standard

This includes the proposed governance and management structure, including skill and experience of governing board, and leadership team, relevant experience and record of performance based on due diligence. Also included is school staffing, start-up and operations, performance management systems and facilities plans

Financial/Business Plan

Financial/Business Plan

Does Not Meet Standard

Does Not Meet Standard

This includes the start-up budget, operating budget and budget notes and assumptions

Capacity Analysis Summary

Capacity Analysis Summary

Does Not Meet Standard

Does Not Meet Standard

Included is a summary of all other sections and a statement of the overall confidence of the review committee that the applicant has the capacity to start and operate a successful school

Phase II Absolute Priorities

Recommendation

Academic Benchmarks

New school will increase number of Achieving or Excelling schools on an annual and three year rolling basis; new school will serve students currently not served in Achieving or Excelling schools; new school will establish annual performance targets and benchmarks aligned with the Academic Performance Framework (APF)

Diversity Management

New school will meet diversity definitions in the MNPS Diversity Management Strategy; new school will adopt a diversity plan supportive of and similar in kind to the MNPS Diversity Strategy; new school will not reduce the number of diverse schools (district-run or charter) currently operating in Nashville

Phase III Competitive Priorities (one or more of three)

Recommendation

Growth/Demand

N/A

New school will assist in serving students currently attending schools that are overcrowded or likely to become overcrowded; new school will offer opportunities to serve students at schools with enrollments that are rapidly declining or below a reasonable threshold; new school will expand district capacity to respond to population growth consistent with its goals for academic excellence and diversity; new school will recruit, retain, locate and offer transportation plans that will add unique and/or new options for access to educational opportunities; new school will expand opportunities for families who are unable to access similar options at present

Management Conversion

New school will serve all students residing in the current school zone of an MNPS school with a three year status of Target on the Academic Performance Framework as of fall 2014; sponsor organization offers experience and planning demonstrating expertise in school turnaround and building schools with readiness to teach, readiness to learn, and readiness to act; new school proposal addresses transition challenges and costs associated with serving all students well who reside in the current school zone of an MNPS school with three year status of Target on the Academic Performance Framework; new school will recruit, retain, locate, and offer transportation plans that will add unique and/or new options for access to educational opportunities; new school will expand options for families who are unable to access similar options at present

Continuation/Additional Grades for Existing Operators



New school will open a high school pathway with priority enrollment for all students matriculating from an existing middle school managed by the same operator; existing middle school will be in Achieving or Excelling status on the Academic Performance Framework; review of the criteria for replication applications offers great confidence that the new school will continue to serve students well

Applications that pass the capacity review and meet the absolute priorities in Phases I and II may be considered for their ability to serve the competitive priority of management conversion. All applications found to have the capacity to serve this priority will be then ranked by tier-level according to the relative quality of the plan and the strength of the stated commitments.

Phase IV Annual New School Investment Plan Matching

Once applications have been ranked by tier-level according to their competitive priority ranking, and the district's annual needs assessment plan report is complete, the Office of Innovation in consultation with Student Assignment, Diversity Management, and the Director's Office will consider and make recommendations for investment in new schools matched to identified needs of the district. Schools will be selected to fill needs according to their priority ranking until all identified annual needs are met.

Academic Plan

Plan Summary - International Academy of Excellence proposes to open an elementary school with grades K-4, beginning with Kindergarten in the southeast area of Davidson County. The school proposes a modified STEM approach with an emphasis on linguistic and cultural diversity, and will prepare students for success in a global society. IAE will provide an esteemed education, meaning the implementation of a standards-based curriculum, extended instructional time and an early college focus. Technology will be implemented in every classroom and a co-teaching model was presented.

Analysis - The Educational Plan does not meet standard for approval because the proposal is more theoretical in nature with many different theories presented, but with little or no research concerning which of the theories has been proven to improve academic outcomes for the targeted population of students. Educational strategies were unclear and academic benchmarks were vague and used outdated adequate yearly progress metrics as an indicator of success. No clear plan was presented as to how those strategies would be implemented, and the applicants were very vague on what success in a global society might look like. Although STEM was mentioned, there is insufficient detail - no strategies were mentioned and there are no student technology goals.

Applicants were unable to provide a clear plan for assessment and communication of goals for students in grades K-2, indicating there would be internal benchmarks set and assessments given. However, the review team is unclear on how that would be accomplished. Additionally, the applicant referred to outdated assessments (PARCC, ELDA, TELPA, etc.) and did not reference TN Ready or the recently adopted assessments for EL students. No formative or interim assessments were mentioned, with the exception of NWEA MAP, which was mentioned only briefly and not fully explained as to its use. There was no clear plan to review data or how data would be used to inform instructional practice.

There is no consistency throughout the document or during the interview concerning both class size and the co-teaching model. Five different co-teaching models were outlined in the application and when questioned, the applicants stated they would take the best from each one. They additionally stated the teachers would be able to choose which ones they would use, and also that the co-teaching model would be phased in, leaving the review team confused as to how co-teaching might be implemented or how teachers would be trained in its use and effectiveness.

The applicants state that students who need more educational support or who do not make sufficient academic progress may be referred to their family physician for evaluation of a medical condition (such as ADHD). Although there is a reference to RTI2, it is not clear how it will be implemented or when a referral to a physician might be warranted. The review team has many concerns with this approach, which only were heightened after the interview process:

- Schools do not typically refer children to their family doctor for ADHD diagnosis
- Applicants were unable to sufficiently answer very specific questions related to provision of special education services to students who may have multiple disabilities, stating frequently that transparency is important. Reviewers are unsure if the applicant understands they are required to serve all students, regardless of disability, under Tennessee law, and the indication was they would be letting families know their school was not the best place for a child with multiple behavior or academic issues.
- No differentiated levels of instruction offered for special needs learners
- Budget assumptions regarding how the applicant would provide special transportation or other services to students with those needs were vague and unclear. While there was a reference to working with MNPS, no evidence was presented that gave the review team confidence this applicant understands the financial ramifications or obligations of providing related services, transportation, additional personnel, etc. for special needs students.
- No clear plans for the required on-going progress monitoring for students with disabilities
- Applicants used IEP's and Tier II and III interventions interchangeably, thus contributing to the general review team sense that the applicants do not understand the difference between interventions for general education students and students with disabilities who have an IEP.

The southeast portion of Nashville, where the applicant has indicated they will locate their school, has a very high EL population, and the applicants indicated plans to teach Spanish, as well as Japanese and/or Arabic utilizing Rosetta Stone software. While applicants discussed the benefits of acquisition of another language at an early age, the review team had concerns about very young students' capacity to learn two additional languages at one time, particularly those who already struggle with English. There was insufficient detail given concerning research around this strategy, nor could the applicant articulate how this would be incorporated into the daily schedule. There does not appear to be a robust, comprehensive plan to accommodate students whose first language is not English.

The recruitment and enrollment plan for attracting students is insufficient in detail and there is no robust proposal presented to ensure the school will be able to attract area families or a defined recruitment area given.

Amended Application Analysis of Education Plan

The amended Academic Plan does not meet standard because, while the applicant did present a clearer picture of blended learning and a better look at co-teaching, the review team was unable to determine a clear curriculum plan, nor were there any STEM goals discussed, although STEM was mentioned in the narrative. There appears to be a heavy reliance on computer programs rather than teacher provided instruction and the technology plan related to blended learning was unclear and vague. Professional development for teachers also seemed vague and lacked specificity or detail.

The plans for special education students were still unclear, and the applicant still indicated they would refer a student to their family doctor for ADHD assessment, as well as referring students back to MNPS for certain services. Additionally, the applicant referenced special education students, ELL students, and RTI2 services interchangeably, which does not give the review team confidence that the applicant has the expertise needed for those special populations of students.

Additionally, the applicant still referred to outdated state assessments such as the PARCC, ELDA, and TELPA, and listed Study Island as a tool for RTI2 progress monitoring, which is not a viable or allowable option.

Reviewers had questions about the school schedules, particularly the extended day services. The daily schedule seemed especially long for young children, and there was a lack of clarity surrounding the extracurricular activities in the afternoon. It appeared that this was when the language classes would be offered, as opposed to being integrated into the regular school day. Additionally, the applicant still included teaching as many as three languages, but did not offer a clear rationale other than preparation for a "global" world.

Operations Plan

Plan Summary - International Academy of Excellence is sponsored by Beyond the Border non-profit organization. The governing board consists of seven (7) members, with an additional two (2) members added upon approval. There will be an Executive Director and Principal, as well as five (5) core teachers the first year of operation and three (3) non-core teachers. The school will follow the MNPS yearly schedule, and the school day will begin at 7:30 and end at 3:55, with additional time until 4:45 for extracurricular activities. They have tentatively selected a facility, and will purchase buses for transportation. The applicant will work with MNPS food service to provide meals.

Analysis - The Operational Plan does not meet standard for approval because there is very little specificity concerning critical aspects of school operations. Starting with the governing board, board members appear have a variety of education experience, but there is no one on the board with management, organizational or start-up school experience and the review team is not confident the expertise needed to open and run a new elementary charter school exists with the current members. Additionally, the applicant has an inadequate policy in place to handle parent concerns, and is under the mistaken impression that all complaints will go to the MNPS Director of Schools. Because of this the review team is not confident that this governing board is aware of its responsibilities.

Throughout the application, the applicant refers to the use of technology, but the budget assumptions do not show any laptops or other computers for students. When questioned in the interview, the applicant team indicated they would rely heavily on a community partner who owns a computer shop. However, no evidence was presented that gives the review team confidence this partner and/or the applicant team understand the required elements for building out a computer network. This lack of attention to detail is very concerning to the review team.

Additionally, the start-up plan as presented is confusing and does not appear to have been well-thought out. For example, the applicant indicates if approved, they would conduct a lottery between June and September 2015. This timeline is unrealistic at best and at worst reflects an inadequate understanding of Tennessee law as it relates to lottery requirements.

The facility plans are very concerning to the review team. Although the applicants identify a space they may lease and include the lease agreement, there is a lack of specificity concerning if 13,000 square feet is adequate, how much build out will be required in order to be able to house students, who is responsible for payment for such

build-out, the timetable required to execute the required changes, and whether there is money in the budget to cover all cost contingencies.

Transportation is described as purchasing one bus, but the school will begin with 100 students. Assuming even 80% of the students ride the bus, one will be an inadequate number. Additionally, there is no plan presented that outlines a bus route, where students will be picked up, or presents a contingency plan in the event the one bus breaks down or must be taken out of service for repairs.

Equally concerning is the teacher recruitment process outlined on page 92 of the application. The plan lacks a clear vision of how the applicant expects to attract and retain teachers and contains no job descriptions or expectations for teachers. While the applicant speaks of co-teaching with either two teachers or a teacher and an educational assistant in each classroom, the staffing model shows only 5 teachers in year 1 with one educational assistant.

Professional development plans are unclear and lack specificity. While they are described generally, the review team could not determine how, when or on what relevant topics professional development would center. Reference is made to specific professional development on both ELL and special education that has been developed by different professors. However, it is not clear whether these professors would be doing the training, or if a staff member would be trained and then utilize the "train the trainer" method of ensuring the staff is trained. Neither the methodology nor pedagogy of these training programs is discussed in any detail, so it was impossible for the review team to determine if these programs are adequate or if they include elements of Tennessee law. Additionally, it is not clear if the applicant must pay for the use of these programs or trainers, and there is no mention of them in the budget assumptions.

Food service plans are inadequate and unclear. While the applicant indicates they prefer a partnership with MNPS, they also reference "scratch" cooking, and there are no indications they are aware of the space and equipment requirements needed in order for MNPS to be able to provide service. Additionally, there is no mention of whether there is any such equipment or a kitchen already in place in the proposed facility and there is no money in the budget assumptions for building out such a space. The applicant does not appear to understand the requirements of the School Nutrition Program.

Finally, school health and safety plans are inadequate and lack specificity. The applicant seems to indicate they will partner with the Metro Health Department to assist with nutrition, but the Health Department has a contract with MNPS and does not serve charter schools. The costs for a health care provider are not reflected in the budget.

Amended Application Operational Analysis

The amended operational plan does not meet standard for approval because it did not substantially change from the first application submitted. Although the applicant did clarify their food service plans and included a quote from MNPS transportation for their bus service, many other items that were cited deficient remained concerning to the review team, including:

- Lack of specific professional development plans - while the applicant clarified how many times PD would occur, they did not offer any specificity.
- ELL and Special Education training for teachers was cited as being given from samples developed by two professors, but lacked citations on this model or if these models qualified as best practice
- Teacher recruiting and staffing is still unclear and lacks focus
- Equipping a kitchen to the standard necessary for MNPS food service to be able to serve the school was not mentioned in the budget assumptions or in the budget line items.
- Costs for build-out that may be required in a leased building were not itemized or included in budget assumptions.
- The amended application includes a quote from the MNPS transportation department, but the narrative of the application also included an indication the organization would purchase a bus. The review team is not clear on how transportation will be provided to all students.
- The description of how the school would handle complaints still appears to be under the assumption that complaints would be directed to the MNPS Director of Schools.

Financial/Business Plan

Plan Summary - The International Academy of Excellence submitted their budget on the incorrect form and the team was unable to fully evaluate this part of the application.

Analysis - The Financial Plan does not meet the criteria for approval due to the fact that it could not be evaluated after being submitted on the wrong form and deemed incomplete.

The team did look at the budget assumptions, however, and it was determined that many of the assumptions did not align with the claims made in either the written application or in the interview process. Some examples:

- STEM mentioned in the academic section but no mention is made in the budget assumptions for computers for students.
- Most state assessments are moving to on-line administration, and while the applicant indicated they would purchase a laptop cart, this is not reflected in the budget assumptions.
- Use of Kickboard software for student monitoring is mentioned numerous times throughout the written document; however, there is no mention of this program in the budget assumptions.
- While the applicant speaks of co-teaching with either two teachers or a teacher and an educational assistant in each classroom, the staffing model shows only 5 teachers in year 1 with one educational assistant.

During both the written application review and the follow-up interview, it is clear the applicant does not have a strong understanding of funding streams, or how they would receive their BEP monies. The indication was that they would rely on grants when and if funding deficits occurred, but when questioned, could not provide specifics on the grants that would be pursued, donors who have committed, or will commit, resources for the school. A contingency plan for the school should their enrollment fall below the 100 students required to meet their budget is non-existent and this is concerning to the review team. Cash flow projections do not meet the criteria outlined in the Financial Performance Framework, salaries are out of line (year 5 the principal is projected to receive between \$207,000 and \$530,000), and very little money is budgeted for textbooks, supplies, assessments, furniture, etc.

The applicant makes reference to partnering with EdTec to provide back-office services, and EdTec appears to have given prices, but those services are not detailed in the budget assumptions.

Amended Application Financial /Business Plan Analysis

The amended application financial/business plan does not meet the criteria for approval because, while the review team could see improvements in the budget development, there were still concerns regarding the lack of alignment between the budget narrative, the academic plan and the budget document. For example, the academic plan calls for two teachers per classroom; however, the budget outlined five teachers for the first year for 100 kindergarten students. This appears to include ELL and Special Education teachers as well. Additionally, the budget narrative shows the recommendation for hiring three (3) assistant teachers. The staffing plan on page 51 matches the budget, but the budget does not match the instructional plan. The staffing model alternately shows a 16:1 and a 20:1 ratio. Additional to this, the applicant once again used the incorrect form to submit the budget, using the old state form instead of the new one posted for all 2015 applicants on the state's web site.

Applicants made the assumption that they will receive CSP grant money in the amount of \$500,000, and made that a part of their budget. The CSP grant is a competitive grant and there is no guarantee the school will be awarded the grant.

Applicants made the erroneous statement that EdTec, a back office provider, would serve as their Charter Management Organization (CMO). This appears several times throughout the application and gives the review team a clear indication the applicant does not understand the terminology or the function of a CMO.

Finally, reviewers expressed their deepest concerns regarding funds for technology. Within the described blended learning environment, the applicants appear to utilize a variety of computer programs and hardware, but there is no corresponding budget for either that would support a blended learning environment.

Capacity Analysis Summary

Analysis – The International Academy of Excellence does not meet the standard for approval in any of the three major areas of the application: Academic Plan, Operational Plan, or Financial Plan. The review team does not believe this applicant can start and sustain a successful, high-performing school that raises the academic achievement of the students who attend.

The academic plan lacks definition and is not well-designed. There is a lack of focused curriculum, robust supports for struggling and special needs students, a plan for EL students that aligns with state law, and targeted academic benchmarks with outcomes that are indicative of a high performing school. Little research is presented to support the co-teaching model as it relates to the targeted population of students, and there is a lack of specific, measurable, and coherent academic strategies that would give the review team confidence that the applicant can open and run a successful school. Most disturbing to the review team was that it appears students with significant disabilities might be discouraged from attending the school. The applicant states attending the school is a privilege, and clearly does not understand the premise of a free public education for all.

The operational structure is equally unfocused, with no solid student or teacher recruitment plans, inconsistencies in staffing models, and vague transportation and food service plans. Facility plans are ambiguous and there is no plan presented that convinces the review team the applicant is aware of the cost of bringing the facility up to current codes and ADA requirements or how much that might cost. The co-teaching model referred to throughout the application as either two teachers or a teacher and an educational assistant in each classroom is not evident in the staffing models or in budget assumptions. Budget assumptions do not align with the narrative within the application in key areas, and contingency plans are non-existent.

While the team was unable to review the financial document, as it was submitted on the wrong form and was incomplete, the budget assumptions and the few line items we could see do not align and it is impossible to discern if the applicant has the expertise or experience to create a viable, robust budget that supports the mission, vision, and academic plan for the school.

Amended Capacity Analysis

The amended application does not meet the standard for approval in any of the three major areas of the application. This includes the Academic, Operations and Financial plans. The review team still does not have confidence this applicant can open and sustain a successful school that creates a high-quality learning environment or is in the best interests of the students, families or community in which they wish to locate.