



Executive Director’s Recommendation Dream Catchers Charter School Appeal

Pursuant to Tennessee Code Annotated (“T.C.A.”) § 49-13-108, sponsors proposing to open a new charter school may appeal the denial of its amended application by a local board of education to the Tennessee Public Charter School Commission (“Commission”). On August 8, 2025, the sponsor of Dream Catchers Charter School (“sponsor” or “Dream Catchers”) appealed the denial of its amended application by the Memphis-Shelby County Schools (“MSCS”) Board of Education to the Commission.

Based on the procedural history, findings of fact, analysis, and Review Committee Recommendation Report, attached hereto, I believe that the decision to deny the Dream Catchers amended application was not contrary to the best interests of the students, local education agency (“LEA”), or community.¹ Therefore, I recommend that the Commission uphold the decision of MSCS Board of Education to deny the amended application for Dream Catchers.

STANDARD OF REVIEW

Pursuant to T.C.A. § 49-13-108 and Commission Policy 2.000, Commission staff and an independent charter application review committee conducted a de novo, on the record review of the Dream Catchers amended application. In accordance with the Tennessee Department of Education’s Charter Creation Application Evaluation Guidance and Review Tool (“rubric”), “[t]o be eligible for approval, an application must receive a “Meets or Exceeds Standard” rating for all applicable sections (academic plan and design, operations plan and capacity, and financial plan).”² In addition, the Commission 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 Commission must find that the application meets or exceeds the metrics outlined in the Tennessee Department of Education’s application-scoring rubric and that approval of the amended charter application is in

¹ T.C.A. § 49-13-108.

² Tennessee Department of Education’s Charter Creation Application Evaluation Guidance and Review Tool, pg. 3.

³ T.C.A. § 49-13-108.

the best interests of the students, local education agency, or community.⁴ If the local board of education's decision is appealed, then the Commission can approve the application, and thereby authorize the school, or can affirm the local board's decision to deny.

PROCEDURAL HISTORY

1. The sponsor submitted its initial application for Dream Catchers Charter School to Memphis-Shelby County Schools on February 3, 2025.
2. MSCS assembled a review committee to review and score the Dream Catchers initial application.
3. On March 6, 2025, MSCS's Review Committee conducted a capacity interview with representatives of Dream Catchers.
4. MSCS's Review Committee reviewed and scored the Dream Catchers initial application, indicating concerns with the academic model, governance structure, parent and community support and demand, recruitment and enrollment, saturation, facilities, fiscal operations, procedures and sustainability, and missing or incomplete documentation.
5. On April 29, 2025, MSCS Board of Education voted to deny the Dream Catchers initial application.
6. The sponsor amended and resubmitted its application for Dream Catchers to MSCS on May 30, 2025.
7. MSCS's Review Committee reviewed and scored the Dream Catchers amended application based on the charter application-scoring rubric and rated the operations section as partially meets the standard and the academic and finance sections as does not meet the standard.
8. On July 29, 2025, the MSCS Board of Education voted to deny the amended application of Dream Catchers.
9. The sponsor appealed the denial of the Dream Catchers amended application in writing to the Commission on August 8, 2025, including submission of all required documents per Commission Policy 2.000.
10. The Commission's Review Committee independently analyzed and scored the Dream Catchers amended application using the Tennessee Department of Education's charter school application-scoring rubric.

⁴ T.C.A. § 49-13-108.

11. On September 10, 2025, the Commission staff held a public hearing at Barnes Auditorium in Memphis, Tennessee. At the public hearing, the Executive Director, sitting as the Commission’s designee, heard presentations from the sponsor and MSCS and received public comment regarding the Dream Catchers amended application.
12. The Commission’s Review Committee conducted a capacity interview with key members of the Dream Catchers leadership team on September 17, 2025 via Microsoft Teams.
13. After the capacity interview, the Commission’s Review Committee determined a final consensus rating of the Dream Catchers amended application, which served as the basis for the Review Committee Recommendation Report, attached hereto as **Exhibit A**.
14. The Commission staff conducted a full review of the record which includes the initial and amended applications submitted by the sponsor, documentation submitted by MSCS, and the findings of the public hearing and public comment. The Commission’s General Counsel conducted a full review and legal analysis of the record.

FINDINGS OF FACT

District Denial of Initial Application

The Review Committee assembled by MSCS to review and score the Dream Catchers initial application consisted of the following individuals:

Name	Title
Kimberly Adams	MSCS Federal Programs, Charter and Training Schools Senior Manager
Emily Barbee	MSCS Advanced Academics/Optional School Advisor
LaShundia Brooks	MSCS Human Resources Talent Management, Executive Director
Robert Brown	MSCS Information Technology, Manager
Melinda Callahan	MSCS Family Partnership and Community Outreach Advisor
Phelicia Cunningham	MSCS Assessment and Accountability, Continuous Improvement Advisor
Kimberly Jackson	MSCS College Career Technology Education Advisor
Norrell Malone	MSCS Virtual Education, Instructional Facilitator
Teneisha McNeil	MSCS Multilingual Learners Charter Advisor
Brittany Monda	Expert External Reviewer
Courtney Muldrow	MSCS Office of Charter Schools, Advisor Organizational Quality
Alexander Roberson	Expert External Reviewer
Leslie Roberts	MSCS Enrollment and Attendance Advisor
Michelle Robinson-Jones	MSCS Mental Health and Wellness, Regional Manager

Name	Title
Dedriene Rogers	MSCS Exceptional Education, Charter Advisor
Irene Simpson-Ford	Parent/Community Reviewer
Latoya Stripling	MSCS Nutrition Services Associate
LaKeva Thompson	MSCS Charter Schools, Instructional Coach
Christian West-Coleman	MSCS Office of General Counsel, Associate General Counsel
Audrey Williams	MSCS Transportation Director
Elizabeth Woodcock	Charter Leader Reviewer

The Dream Catchers initial application received the following ratings from the MSCS Review Committee:

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

After the MSCS Review Committee completed its review and scoring of the initial application, its analysis was presented to the MSCS Board of Education on April 29, 2025. The MSCS Board of Education voted to deny the initial application of Dream Catchers.

District Denial of Amended Application

The Review Committee assembled by MSCS to review and score the Dream Catchers amended application consisted of the following individuals:

Name	Title
Kimberly Adams	MSCS Federal Programs, Charter and Training Schools Senior Manager
Karen Ball-Johnson	MSCS Federal Programs - Special Projects, Senior Manager
Emily Barbee	MSCS Advanced Academics/Optional School Advisor
LaShundia Brooks	MSCS Human Resources Talent Management, Executive Director
Melinda Callahan	MSCS Family Partnership and Community Outreach Advisor
Phelicia Cunningham	MSCS Assessment and Accountability, Continuous Improvement Advisor
Kimberly Jackson	MSCS College Career Technology Education Advisor
Teneisha McNeil	MSCS Multilingual Learners Charter Advisor
Brittany Monda	Expert External Reviewer
Courtney Muldrow	MSCS Office of Charter Schools, Advisor Organizational Quality
Alexander Roberson	Expert External Reviewer

Name	Title
Leslie Roberts	MSCS Enrollment and Attendance Advisor
Michelle Robinson-Jones	MSCS Mental Health and Wellness, Regional Manager
Dedriene Rogers	MSCS Exceptional Education, Charter Advisor
Irene Simpson-Ford	Parent/Community Reviewer
Latoya Stripling	MSCS Nutrition Services Associate
Audrey Williams	MSCS Transportation Director
Elizabeth Woodcock	Charter Leader Reviewer

Upon resubmission, the MSCS Review Committee conducted a review of the amended application, and the amended application received the following ratings from the MSCS Review Committee:

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

After the MSCS Review Committee completed its review and scoring of the amended application, its analysis was presented to the MSCS Board of Education on July 29, 2025. At the July 29, 2025 board meeting, the MSCS Board of Education voted to deny the amended application of Dream Catchers.

Commission Review Committee’s Evaluation of the Application

Following the denial of the Dream Catchers amended application and subsequent appeal to the Commission, Commission staff assembled a diverse review committee of internal and external experts to independently evaluate and score the Dream Catchers amended application. This Review Committee consisted of the following individuals:

Name	Title
Thomas Branch	External Consultant
Pam Lehman	Commission Staff
Maggie Lund	Commission Staff
Claire Seguin	Commission Staff
Erin Solomon	External Consultant
Jeff Wasbes	External Consultant

The Commission’s Review Committee conducted an initial review and scoring of the Dream Catchers 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 committee’s consensus rating of the Dream Catchers application was as follows:

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

The Review Committee recommends the denial of the amended application for Dream Catchers because the applicant failed to provide sufficient evidence in the academic, operational, and financial sections to demonstrate the application meets the required criteria of the rubric.

The applicant’s Academic Plan and Design does not meet the standard because the application lacked an adequate recruitment plan and sufficient community support such that enrollment targets would be met as outlined. The applicant aims to open kindergarten through twelfth grade and enroll 150 students in its first year of operation; however, the plan lacked detail about how a K-12 Montessori model would be differentiated across multiple grade bands of students and would be adjusted for high school course requirements. Finally, the application lacked detail regarding the plans for identification and continuum of services for students with disabilities and English learners, including how the projections were derived, and the applicant lacked sufficient contingency plans should student needs be greater than projected.

The applicant’s Operational Plan and Capacity does not meet the standard due to a lack of detail regarding the school’s governance, staffing plan, the facility timeline and start-up plan, and the numerous responsibilities placed on the principal position. There is a lack of clarity regarding the school’s governing board given the changes in structure and makeup of the board between the application and the capacity interview. Additionally, the application lacks a thorough recruitment and hiring strategy for staff, and the outlined salaries are not competitive with the geographic district. The sponsor did not provide a definitive timeline for identifying and potentially renovating a facility. Finally, the applicant outlines numerous responsibilities for the principal position, and there is a lack of clarity regarding the leadership of the school and the feasibility of the roles and responsibilities of the principal.

The Financial Plan and Capacity also does not meet the standard due to a lack of clarity as to who on the leadership team will be responsible for financial oversight of the school. The applicant outlined during the capacity interview that the principal would be responsible for financial oversight, though the outlined roles and responsibilities for the principal in the application do not list necessary financial experience. Additionally, the applicant lacks strong contingency plans to ensure financial viability, and this, coupled with the lack of evidence that

enrollment targets will be met, creates significant financial instability.

For the aforementioned reasons, the Review Committee found that the sponsor did not meet or exceed the standard for approval based on the department's scoring rubric.

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

Public Hearing

Pursuant to statute⁵ and Commission Policy 2.000, a public hearing chaired by the Executive Director was held on September 10, 2025. Representatives from Memphis-Shelby County Schools at the public hearing focused on the quality of the application review process, the support that was provided to the applicant throughout the review process, and the reasons for denial of the application. Representatives from MSCS indicated that the Dream Catchers amended application was denied because the application did not meet standard for academics, partially met standard for operations, and did not meet standard for finance. Representatives from MSCS further explained that the applicant did not provide sufficient details regarding the academic plan, plan to engage parents and recruit students, and there were numerous misalignments throughout the application narrative and the budget.

In the sponsor's opening statement, the attorney representing the proposed school, along with the executive director, stated that they have received confirmation and would be awarded a \$750,000 Charter School Program ("CSP") grant from the Tennessee Department of Education to open the school, illustrating support of the school's application. The sponsor then explained the homelessness crisis that Memphis is facing, citing that there are 2,900 homeless youth in the area, and describing the school's intent to serve this population and provide a pathway for home ownership. The sponsor spoke to the support received for the school, including from legislators, and stated that the proposed school administered a survey to over 1,030 respondents that demonstrates support for their vision. The sponsor claimed that the submitted amended application to the district was not appropriately evaluated and that there were seventy-seven misstatements, errors, and statutorily noncompliant issues, as evidenced by their attorney. Additionally, the sponsor elaborated on the success of Daughters of Zion, the sponsoring non-profit entity, in terms of their grant management, further demonstrating their credibility.

During questioning by the Commission, representatives from MSCS described the instruction provided to applicants between the initial and amended applications including

⁵ T.C.A. § 49-13-108.

providing opportunities to discuss the feedback and any questions the operator may have. The district further elaborated on how the ratings were adjusted between initial and final reviews given the operator provided additional clarity in sections of the operations plan. Representatives from the district provided further details about their concerns regarding the enrollment plan and proposed location of the school. Given the population the school intends to serve is consistently transient, there were concerns surrounding the outlined recruitment and enrollment plan, particularly marketing the school as a “homeless school”. Additionally, the applicant did not provide a specific neighborhood or region within Memphis in which they intend to locate. Finally, representatives from the district explained the governance concerns for the school stating that the proposed governing board is unbalanced and lacks certain areas of expertise.

The Commission then questioned the sponsor, starting with questions about how statistics of homeless youth will translate to enrollment. Representatives from the sponsor cited state and city leaders speaking about the homelessness crisis and that there is no other school within Memphis that will address this crisis. The sponsor then stated that they intend to cast a wide net and recruit students from across the city, as the crisis is city-wide. The sponsor also stated that the district does not understand marketing and promotion. The sponsor continued that the school will not be marketed as a homeless school, but instead as an opportunity to realize the American dream. When asked about how the outlined academic model will best serve this at-risk population of students, the sponsor described the importance of providing transportation for students and having a flexible schedule with mastery-based learning. The sponsor added that with the Montessori model providing the opportunity for mixed-age classrooms, younger students being around older students naturally elevates academic performance, and students can get help from their peers.

The Commission then questioned the sponsor about the capacity of the governing board to oversee the charter school, and the sponsor clarified that Daughters of Zion would be the governing board of the school and that they comply with state law given that it is not a religious organization. The sponsor also went into details about the other entities operated by Daughters of Zion including an adult daycare, Shalom House of Memphis, William and Johnson Career College, and a home healthcare company. The sponsor stated that they expect Dream Catchers Charter School will have a great principal and that the school will essentially run itself. Finally, the sponsor clarified that they selected six facilities that would attract the largest number of homeless students, and once they have access to the CSP grant, they will be ready to rent any of the outlined facilities.

The public hearing concluded with closing statements by both parties and the receipt of ten in-person comments, with zero speaking in support of MSCS and ten speaking in support of

Dream Catchers. The Commission also accepted written comments, and the Commission received fifty-four written comments, with three writing in support of MSCS and fifty-one writing in support of Dream Catchers.

Analysis

State law requires the Commission to review the decision of the local board of education and determine if the application “meets or exceeds the metrics outlined in the Tennessee Department of Education’s application-scoring rubric and,” whether “approval of the application is in the best interests of the students, LEA, or community.”⁶ In addition, pursuant to T.C.A. § 49-13-108, the Commission adopted the State Board of Education’s Quality Charter Authorizing Standards set forth in State Board Policy 6.111 and utilizes these standards to review charter applications received upon appeal. In making my recommendation to the Commission, I have considered the Review Committee’s Recommendation Report, the documentation submitted by both the sponsor and MSCS, the arguments made by both parties at the public hearing, and the public comments received by Commission staff and conclude as follows:

The Review Committee’s report and recommendations are thorough, citing specific examples in the application and referencing information gained in the capacity interview in support of its findings. For the reasons explained in the report, I agree that the Dream Catchers amended application did not rise to the level of meeting or exceeding the standards required for approval.

I agree with the sponsor that students experiencing housing insecurity is an epidemic, and I admire the desire to design an academic program tailored to those students and their needs. However, the sponsor’s application lacked critical details and plans to warrant my recommendation for approval. The sponsor clearly states its mission is “to ensure that every student has access to a trauma-informed, individualized K–12 education that promotes academic achievement, socio-emotional wellness, and long-term success through graduation and postsecondary readiness,”⁷ but the sponsor did not clearly define how the decision to utilize a Montessori model would further the mission of the school apart from mixed-age groupings. The Montessori model is complex and includes additional classroom supplies, adjusted scheduling, and additional training for staff for effective implementation. The sponsor did not detail how the Montessori model would be implemented, particularly considering the sponsor’s desire to open with all grades, kindergarten through twelfth, beginning in Year 1. The demands and responsibilities of a school vary greatly as students matriculate through grade bands, and

⁶ T.C.A. § 49-13-108.

⁷ Dream Catchers Charter School Amended Application, pg. 14

the sponsor's application did not detail sufficiently the plans to ensure that the Montessori model is implemented with fidelity and appropriately adjusted for different grade bands.

Additionally, the sponsor did not have evidence of a sufficient recruitment plan to meet the standard for a recommendation of approval. The sponsor's application states that it has a target enrollment of 150 students in Year 1. When questioned during both the public hearing and capacity interview, the sponsor did not provide adequate additional information related to the plans to ensure those enrollment targets were met. The sponsor testified to statistics of school-age children experiencing homelessness throughout Shelby County but did not indicate how they intended to target those students such that they would choose to enroll at Dream Catchers Charter School. Detailed recruitment and enrollment plans are a requirement for approval and are foundational to charter school success. I cannot recommend approval of an application if there is a lack of evidence that the school can recruit enough students to meet projected enrollment. The sponsor stated intentions to use various mediums to market to students experiencing homelessness or those at risk of experiencing homelessness, but there remains a question as to whether those mediums would effectively reach the targeted population and lead them to enroll in the school. The sponsor testified that there is an intention to receive referrals from Memphis-Shelby County Schools for students eligible to enroll. However, there is no statutory obligation for local districts to assist public charter schools to identify students for enrollment. Overall, the recruitment and enrollment plans for the school contained too many gaps to be addressed to meet the standard for approval.

Further, the sponsor did not provide in the application, capacity interview, nor public hearing sufficient community support and demand to meet the standard for approval. The sponsor conducted a survey in which they indicated that approximately 1,030 community partners support a public charter school specifically serving students experiencing homelessness or at risk of homelessness. However, there was no indication that any of the surveys were completed by persons intending to enroll their children in such a school if approved. While I appreciate the individuals who commented in support of the school and the leadership, there is no evidence that this support will directly result in the enrollment of students in the school. Again, I agree with the sponsor that homelessness is at a critical level, not just in Shelby County, but nationwide. It is with this context that I understand the gravity that approval of an application to serve this highly vulnerable population holds.

The sponsor also did not detail the plan for service to special populations, despite indicating that Dream Catchers would serve 10% students with disabilities and 10% English learners. The plan to hire one special education and English learner teacher in Year 1 to serve all grades is concerning when considering the sponsor's intent to open kindergarten through twelfth grade in Year 1. Chief among the concerns is the sponsor's testimony during the capacity



interview that the school would work to find other options for students it could not serve. A public charter school is required statutorily to serve all students and counseling a student out of the school is a material violation of the Charter School Act and any charter agreement with the Commission. I cannot recommend approval of an application that includes plans that amount to a violation of law.

I also agree with the Review Committee that the sponsor's Operations Plan and Capacity does not meet the standard for approval. Any approved application would result in a charter agreement for ten years with the governing board of the proposed charter school. The new start application provides authorizers and districts with the opportunity to evaluate the capacity of the governing board to operate the charter school. However, the entity identified within the application as the governing board differed from the entity identified within the capacity interview as the governing board. The sponsor then provided the names of the new board members, some of whom differed from those listed in the application. Since the governance information provided in the capacity interview did not align with the governance information contained within the application, I cannot fully assess the governance of the school and determine whether effective oversight and monitoring of the school will be in place. Additionally, the governing board is the legal entity with which the Commission signs a charter agreement, and it is critical that the governance structure is clear within the application and the capacity interview. In the case of this applicant, there is significant misalignment and a lack of key details in governance, and therefore, it does not meet the standard for approval.

The sponsor also did not set forth a strong facility plan within its application. A facility plan does not meet the standard if the application fails to demonstrate alignment to the projected enrollment or if there is a lack of evidence of progress in identifying or securing a facility for the proposed school. I do acknowledge that the sponsor identified six different facilities throughout Shelby County in its application. However, identification of facility options does not mean that an applicant automatically meets the standard for approval. Additional factors that are evaluated include, but are not limited to, location of facility options in alignment with the proposed targeted community, suitability of the options in alignment with the academic model, and school capacity to secure and renovate the proposed options. Additional factors such as renovation costs, alignment with the budget, and contingency planning are also evaluated. Therefore, the applicant's statement that they meet the standard for approval in facilities by naming six vacant and underutilized facilities leaves off a significant amount of planning and evaluation that is required to be demonstrated. During testimony at both the public hearing and capacity interview, the applicant was unable to share whether any evaluation or due diligence had been conducted on any of the facility options or if there had been an evaluation of potential renovation needs. A strong facility plan drives enrollment and recruitment, as well as contributes

to teacher and staff recruitment. The location of a facility affects many other items within a school including the transportation plan and the food service plan. Given the lack of detail within the facility plan, I am unable to assess the sponsor's ability to secure a facility, identify the top facility options for the school, or identify the proposed community of the school. While the sponsor indicated that, because of the appellate timeline, they would exercise a one-year delay if approved, the Commission's charge is to assess an applicant's readiness to open based on the information in the amended application. Further, the Commission is not permitted to approve an application based on a contingency, in accordance with T.C.A. § 49-13-108. Testimony of an intent to delay is tantamount to a contingency. Therefore, because the sponsor indicated a fall 2026 start date in its application, and based on the facility plan as presented, I cannot recommend approval.

I also share in the Review Committee's concerns about the lack of clarity regarding the responsibilities of the principal of the school when hired. Within the application and during the capacity interview, conflicting information was presented regarding the responsibilities of the principal, identification of the principal, and required experience of the principal. In the application, Kimberly Adams is named as the proposed principal, but in the capacity interview, she was identified as a board member, not the principal. Additionally, the testimony at the capacity interview placed a large burden of responsibilities on the principal in the initial years of the school's operation, including oversight of the school's finances. While it is not required to name a principal during the application process, there was significant conflicting information presented throughout the application process which led to my inability to fully assess the plan for the school's leadership, roles and responsibilities of the leadership team, and the board's capacity to successfully fill the principal role.

Finally, I agree with the Review Committee that the sponsor's financial plan does not meet the standard for approval. I commend the sponsor on the conditional approval of the Charter School Program grant from the Tennessee Department of Education. However, this approval does not signal approval of the sponsor's proposed application. While there were individuals named on the proposed governing board with grant administration experience, the overall financial plan for the school lacked detail regarding the source of revenue, contingency planning, accurate and realistic budgeting, and school and board level financial management. The sponsor's application indicated that Daughters of Zion could be a source of private grants and fundraising as the governing board. However, with a new entity being formed to govern the school, it was not clear if grants from Daughters of Zion were still a funding source to this newly formed board and what the terms would be of any such grant. The sponsor did not indicate who on the staff would be responsible for daily financial oversight beyond testifying that Dream Catchers would contract with GT3 Group to serve as a back-office provider. I agree with the

sponsor’s testimony that GT3 Group is knowledgeable in the charter school financial space. However, an application that meets the standard for approval “describes the financial expertise of the school’s internal and external team members” and the system for oversight for contractors, such as back-office providers. Additionally, the sponsor did not have a realistic contingency plan for the school’s financial plan. Testimony indicated that the school could remain viable with as few as fifty students, but there was no evidence that the school had plans for realistic adjustments to expenses or staffing to remain feasible. These details are critical to the success of the school, and I have significant concerns over the likelihood of success in implementing a financial plan.

Any authorized public charter school is entrusted with the great responsibility of educating students and a significant amount of public funds. For these reasons, the Commission expects that only those schools that have demonstrated a high likelihood of success and meet or exceed the required criteria in all areas will be authorized. While I acknowledge the passion of the sponsor to serve a vulnerable population of students, I did not find evidence that the application met the standards for approval across the academic, operational, or financial plans.

For the reasons expounded on in this report, I recommend that the Commission deny the Dream Catchers amended application.

CONCLUSION

For these reasons, and for the reasons stated in the Review Committee Recommendation Report attached hereto as **Exhibit A**, I do not believe that the decision to deny the amended application for Dream Catchers was contrary to the best interests of the students, the LEA, or community. Therefore, I recommend that the Commission affirm the decision of the MSCS Board of Education to deny the amended application for Dream Catchers.



Tess Stovall, Executive Director
Tennessee Public Charter School Commission

October 17, 2025
Date



EXHIBIT A:
Charter Application Review Committee Recommendation Report

October 17, 2025

School Name: Dream Catchers Charter School

Sponsor: Daughters of Zion

Proposed Location of School: Memphis-Shelby County Schools

Evaluation Team:

- Thomas Branch
- Pam Lehman
- Maggie Lund
- Claire Seguin
- Erin Solomon
- Jeff Wasbes



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 Tennessee Public Charter School Commission (“Commission”). In accordance with T.C.A. § 49-13-108, the Commission shall conduct a de novo, on the record review of the proposed charter school’s application, and the Commission has adopted national and state quality authorizing standards to guide its work. As laid out in Commission Policy 3.000 – Core Authorizing Principles,¹ the Commission 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 Commission adopted Commission Policy 2.000 – Charter School Appeals. The Commission has outlined the charter school appeal process to ensure the well-being and interests of students are the fundamental value informing all Commission actions and decisions. The Commission 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. In addition, the Commission plans to evaluate its work annually to ensure its alignment to national and state standards for quality authorizing and implements improvement when necessary.

The Commission’s charter application review process is outlined in T.C.A. § 49-13-108, Commission Policy 2.000 – Charter School Appeals, and Commission Policy 2.100 – Application Review. The Commission assembled a charter application review committee comprised of highly qualified internal and external evaluators with relevant and diverse expertise to evaluate each application. The Commission provided training to all committee members to ensure consistent standards and fair treatment of all applications.

Overview of the Evaluation Process

The Commission’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

¹ All [Commission rules and policies](#) may be found on the [Commission's website](#).



three sections of the application: Academic Plan and Design, 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 ninety-minute interview with the sponsor, members of the governing board, and identified school leadership 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 and Design:** school mission and goals; academic focus and performance standards; assessments; school calendar and schedule; recruitment and enrollment; parent and community engagement and support; school culture and discipline; special populations; and the capacity to implement the proposed plan.
 - b. **Operations Plan and Capacity:** governance; facilities; start-up plan; personnel/human capital; professional development; transportation; additional operations; and the capacity to implement the proposed plan.
 - c. **Financial Plan and Capacity:** planning and budget worksheet; operating budget; operating budget narrative; and the capacity to implement the proposed plan.

The Commission's charter application Review Committee utilized the Tennessee Department of Education's Charter Creation Application Evaluation Guidance and Review Tool ("rubric"), which is used by all local boards of education when evaluating an application. The rubric states that authorizers should adopt the State Board of Education's ("SBE") Quality Authorizing Standards, which establishes rigorous decision-making criteria. Specifically, SBE

Policy 6.111 states a “quality authorizer requires all applicants to present a clear and compelling mission, a quality educational program, a demonstration of community support, a solvent and sustainable budget and contingency financial plans, a clear demonstration of the effectiveness of the model for the target student population, effective governance and management structures and systems, founding team members demonstrating diverse and necessary capabilities in all phases of the school’s development, and clear evidence of the applicant’s capacity to execute its plan successfully. An application that merits a recommendation for approval should satisfy each of these criteria.”²

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

Rating	Characteristics
Meets or Exceeds Standard	The applicant’s 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 applicant’s response meets the criteria in some respects but lacks sufficient detail and/or requires additional information in one or more areas.
Does Not Meet Standard	The applicant’s response is incomplete, demonstrates lack of preparation, does not align with the mission and goals of the school, or otherwise raises significant concerns about the viability of the plan or the applicant’s ability to carry it out.

² Tennessee State Board of Education Policy 6.111

Summary of the Application

School Name: Dream Catchers Charter School

Sponsor: Daughters of Zion

Proposed Location of School: Memphis-Shelby County Schools

Mission: The mission of Dream Catchers Charter School is to ensure that every student has access to a trauma-informed individualized K–12 education that promotes academic achievement.³

Number of Schools Currently in Operation by Sponsor: There are no schools currently in operation by the sponsor.

Proposed Enrollment:⁴

Grade Level	Year 1: 2026-2027	Year 2: 2027-2028	Year 3: 2028-2029	Year 4: 2029-2030	Year 5: 2030-2031	At Capacity:
K	10	20	25	30	40	60
1	10	20	25	30	40	80
2	10	20	25	30	40	80
3	10	20	25	30	40	80
4	10	20	25	30	40	80
5	20	25	30	40	50	100
6	20	25	30	40	50	100
7	10	20	25	30	40	90
8	10	20	25	30	40	90
9	10	15	20	25	30	60
10	10	15	20	25	30	60
11	10	15	20	25	30	60
12	10	15	20	25	30	60
Totals	150	250	315	390	500	1,000

Brief Description of the Application

The sponsor, Daughters of Zion, is proposing to open a charter school in Shelby County, Tennessee and serve students in kindergarten through twelfth grade. The school, Dream

³ Dream Catchers Charter School Amended Application, pg. 14

⁴ Dream Catchers Charter School Amended Application, pg. 50

Catchers Charter School (“Dream Catchers”), is a new-start school and would be the first school for the sponsor. The school intends to operate in the city of Memphis to provide a “safe, stable, and innovative educational environment for students experiencing homelessness or at risk of homelessness in Memphis and Shelby County.”⁵ The school proposes to offer a Montessori experience for students in kindergarten through twelfth grade and provide an additional school option for students in the city of Memphis.

The application states that the proposed school will be governed by Daughters of Zion, a non-profit entity in Memphis.⁶ In Year 0, Dream Catchers has budgeted \$750,000 in revenue from the Charter School Program (“CSP”) grant and projects \$535,000 in expenses for the school. In Year 1, Dream Catchers projects the school will have \$2,130,626 in revenue and \$2,112,540 in expenses, resulting in a balance of \$233,086. By Year 5, the school projects to have \$7,497,319 in revenue and \$5,909,990 in expenses, resulting in a positive ending fund balance of \$4,474,048.⁷ The school anticipates that 100% of the student population will qualify as economically disadvantaged, 10% of the student population will be students with disabilities, and 10% of the student population will be English learners.⁸

⁵ Dream Catchers Charter School Amended Application, pg. 14

⁶ During the capacity interview, the executive director testified that a new governing board entity would govern the school upon approval.

⁷ Dream Catchers Charter School Amended Budget

⁸ Dream Catchers Charter School Amended Application, pg. 50

Summary of the Evaluation

The Review Committee recommends the denial of the amended application for Dream Catchers because the applicant failed to provide sufficient evidence in the academic, operational, and financial sections to demonstrate the application meets the required criteria of the rubric.

The applicant's Academic Plan and Design does not meet the standard because the application lacked a strong recruitment plan and community support such that enrollment targets would be met as outlined. The applicant aims to open grades kindergarten through twelfth with 150 students in Year 1; however, the plan lacked detail about how a K-12 Montessori model would be effectively implemented across differing grade bands of students and would be adjusted for high school course requirements. Finally, the application lacked detail regarding the plans for students with disabilities and English learners, including how the projections were derived, and the applicant lacked sufficient contingency plans should student needs be greater than projected.

The applicant's Operational Plan and Capacity does not meet the standard due to a lack of detail regarding the school's governance, staffing plan, the facility timeline and start-up plan, and the numerous responsibilities placed on the principal position. There is a lack of clarity regarding the school's governance given the changes in structure and makeup of the governing board between the application and the capacity interview. Additionally, the application lacks a thorough recruitment and hiring strategy for staff, and the outlined salaries are not competitive with the geographic district. The sponsor did not provide a definitive timeline for identifying and potentially renovating a facility. Finally, the applicant outlines numerous responsibilities for the principal position, and there is a lack of clarity regarding the leadership of the school and the feasibility of the roles and responsibilities of the roles.

The Financial Plan and Capacity also does not meet the standard due to a lack of clarity as to who on the leadership team will be responsible for financial oversight of the school. The applicant outlined during the capacity interview that the principal would be responsible for financial oversight, though the outlined roles and responsibilities for the principal in the application do not list necessary financial experience. Additionally, the applicant lacks strong contingency plans to ensure financial viability, and this, coupled with the lack of evidence that enrollment targets will be met, creates significant financial instability.

Summary of Section Ratings

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 will be deemed not



ready for approval and strengths in one area of the application do not negate weaknesses in other areas. Opening and maintaining a successful, high-performing charter school depends on having a complete, coherent plan and identifying highly capable individuals to execute that plan. The Review Committee’s consensus ratings for each section of the application are as follows:

Sections	Ratings
Academic Plan and Design	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 and Design

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee

The applicant's Academic Plan and Design does not meet the standard because the application lacked sufficient evidence that enrollment targets would be met, lacked detail about how a K–12 Montessori model would be effectively implemented, and lacked an adequate plan to serve special populations of students.

The applicant intends to serve youth who are either experiencing or are at risk of experiencing homelessness. Throughout the application and capacity interview, the operator emphasized the need for such a program within the city of Memphis; however, the proposed plan to recruit and retain these at-risk students lacked specificity. During the capacity interview, the Review Committee asked how the sponsor would reach this vulnerable, often disengaged, population of students and recruit them to attend Dream Catchers. The sponsor referenced the marketing experience of the board and the intended use of advertisements such as print, social media, and billboards. The response, however, lacked detail on how these mediums would specifically target the intended population and how the marketing would translate into student enrollments. The sponsor also referenced working with social support organizations and the local district to receive referrals for students, but the district is not required to provide referrals nor was a memorandum of understanding ("MOU") for these partnerships outlined within the application. In addition, the applicant did not provide sufficient letters of support or concrete evidence of their ability to meet enrollment targets, either through outlined partnerships or community engagement efforts. While the Review Committee recognized the passion of the sponsor to serve this vulnerable population, ultimately, the application lacked sufficient detail as to how the applicant would recruit and retain students who are within the target population such that enrollment projections would materialize as outlined.

The applicant intends to open in Year 1 with 150 students across all grades, from kindergarten through twelfth. The sponsor explained that the implementation of the Montessori model will enable the school to open effectively in Year 1, serving all grades, because of the model's mixed-age classrooms and flexibility offered for students. However, the application lacked detail about how the Montessori model would be adjusted across the different grade bands, particularly for high school, to ensure core content and graduation requirements are satisfied. The provided daily schedule did not include the typical components of a Montessori model such as independent work-cycle time and flexible learning environments. As a result, there was a lack of evidence as to how the academic model would be implemented with fidelity within the proposed schedule, across all grades at once, and achieve strong academic results.

Within the application, the sponsor projects that the school will serve approximately 10% students with disabilities and 10% English learners, but the application contains limited details on how these projections were determined. During the capacity interview, the Review Committee asked the applicant how they arrived at these projections, the sponsor stated they used projections from Memphis-Shelby County Schools as a whole. However, looking at the geographic district's demographics does not accurately reflect the specific, vulnerable population the school intends to serve, and therefore, there was a lack of evidence of the school's preparedness to serve these special populations.

Additionally, the applicant intends to hire only one special education and English learner teacher to serve all grade levels in Year 1 which will not satisfy ratio and caseload requirements. When asked how the school would adjust if the number of students requiring services was higher than anticipated, the applicant responded that they would adjust staffing to meet requirements. However, they also mentioned they would work to find other options for students that the school could not serve. Per T.C.A. § 49-13-111, public charter schools are legally required to serve all students, regardless of need or disability and therefore this is not permissible. In totality, the plan outlining service of special populations lacked detail regarding oversight of Individualized Education Plans ("IEPs"), Individual Learning Plans ("ILPs"), and 504 plans and how the school would track, monitor, and provide a continuum of services to students who qualify. While the applicant expressed the intent to target an underserved and highly vulnerable population in Memphis, the application, when assessed against the scoring rubric, lacked sufficient detail on the proposed academic plan and whether the sponsor could effectively implement it.

Analysis of the Operations Plan and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee

The applicant's Operational Plan and Capacity does not meet the standard due to several key deficiencies within the operations plan. There was a lack of evidence regarding the effective oversight and structure of the proposed governing board. Additionally, the application lacked a thorough recruitment and hiring strategy for staff, and the outlined salaries are not competitive with the geographic district. Finally, the sponsor did not provide a sound timeline for identifying a facility, and there was a lack of clarity regarding the leadership of the school.

As stated in the application, the proposed governing board for the school is Daughters of Zion, a Memphis-based non-profit organization, and its bylaws and board members' backgrounds are included within the application as required. However, during the capacity interview, when the Review Committee asked for clarity about who the board members were and their capacity to open and oversee a charter school, the applicant stated that there would be a new board entity created to oversee the school. The sponsor then provided the names of the new board members, some of whom differed from those listed in the application. Since the governance information provided in the capacity interview did not align with the governance information contained within the application, the Review Committee was unable to assess the capacity, experience, and validity of this new board entity nor was it able to evaluate the proposed governing documents. While there was clear educational and grant management experience on the newly proposed board as evidenced in the capacity interview, the Review Committee was unable to determine if there was sufficient legal and financial experience needed to effectively oversee the school as required by the state's scoring rubric.

The sponsor's facility plan and start-up plan outlined multiple vacant or underutilized facility options that are available within the local district. However, the applicant did not provide sufficient information as to what renovation efforts may be associated with these facilities, if any evaluation had been conducted on the feasibility of the renovations, and how the sponsor would cover these costs beyond referring to the \$750,000 CSP grant. The applicant did not detail how they determined the listed facilities are suitable for the proposed school beyond stating that they are existing school structures. Additionally, when asked about how the school would adjust the start-up plan and timeline given the timing of the appeal, the sponsor stated their intent to delay opening for a year to allow sufficient time to acquire a facility. The operator's intent to delay raised questions as to where the applicant stands in terms of their facility acquisition process and overall readiness to open. Although a delay on the initial opening year is permissible under Tennessee law, the Review Committee cannot consider the sponsor's intent

to delay. The Review Committee's charge is to assess the amended application's readiness to open for August 2026. Overall, it is unclear what steps the applicant has taken to determine which of the listed facilities within the application are suitable, or what the actual timeline is for securing and ensuring the facility's compliance, which is an outlined requirement within the rubric.

Additionally, there were concerns regarding the numerous responsibilities placed on the principal of the school. As clarified within the capacity interview, the principal would be responsible for oversight of the school including all compliance requirements, implementation of the academic model and professional development for teachers, financial oversight of the school, and daily management of personnel. However, the outlined job description within the application for the principal did not include experience in charter school compliance or finance. Additionally, Kimberly Adams is listed within the application as the proposed principal for the school, but Ms. Adams was named as a proposed board member in the capacity interview. When asked if a candidate for the principal position had been identified at this time in the capacity interview, the sponsor stated that they had a few candidates they were considering, but they had not hired a principal yet. While identification of a school leader is not a requirement for approval, there is an overall lack of clarity regarding the leadership of the school, the type of candidate the school is looking for, and the feasibility of the roles and responsibilities of the role.

Finally, the application did not outline a sound strategy to recruit and retain highly qualified and licensed staff, which is a concern given that schools struggle with this nationwide. The outlined salary structure for teachers was not competitive with the local district, and when asked about this in the capacity interview, the sponsor stated that their strong school culture and unique model would draw teachers to work at the school regardless of salary level. It is unclear if this strategy will result in the school being able to meet licensure and endorsement requirements for teachers as outlined within the scoring rubric.

Analysis of the Financial Plan and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee

The applicant's Financial Plan and Capacity does not meet the standard because there was unclear information as to who at the school would be responsible for financial oversight and contingency plans for ensuring financial viability lacked specificity.

The Review Committee received contradictory information regarding who would be responsible for the financial oversight of the school. While the application stated that the executive director would handle day-to-day financial management, the sponsor clarified during the capacity interview that the principal would be responsible. The outlined roles and responsibilities for the principal in the application do not list necessary financial experience, therefore there is no evidence that the person hired would have the necessary background to effectively oversee the financial functions of the school. The sponsor also mentioned the intent to contract with a financial back-office provider, but the applicant did not specify who at the school would work directly with them to ensure proper financial oversight. Given these discrepancies, the Review Committee was unable to determine if there was sufficient internal financial expertise within the school leadership or what the reporting structure to the board would be for financial oversight.

The school's financial viability and contingency plans lacked specificity. The application mentioned private grants and fundraising through Daughters of Zion in the event that a financial contingency plan would be needed. However, given the new board entity discussed in the capacity interview, it was unclear what the relationship between the new board and Daughters of Zion would be, or how these funds would be disbursed to the school. The application states that the school would remain financially viable with 125 students, yet during the capacity interview, the applicant claimed they could still operate with a surplus at only fifty students. Given the plan to open with a K-12 model in Year 1, it was unclear how the applicant would adjust expense assumptions and the staffing and student-teacher ratios to remain fiscally solvent with just fifty students. Finally, while the applicant confirmed they would receive a \$750,000 CSP grant to help secure a facility if approved, the sponsor did not provide sound contingency plans for funding renovations, facility improvements, or long-term facility acquisition beyond the grant amount.



Evaluation Team

Thomas Branch is a seasoned executive with over 15 years of experience in finance and operations leadership, and more than 20 years of managing and coaching successful teams. He currently serves as Chief Operating Officer at Valor Collegiate Academies in Nashville, where he has led the organization's growth from one campus to three and guided over \$28 million in facility acquisitions and renovations. Under his operational leadership, Valor has successfully launched five high-performing charter schools and expanded its Compass Camp program from 3 schools to more than 50 nationwide. Prior to Valor, Thomas was Director of Finance & Operations at KIPP Nashville, where he doubled the school's budget, implemented cost-saving systems, and secured large federal grants. He also spent several years in the banking industry as a Financial Center Manager and Vice President, overseeing multimillion-dollar portfolios. Passionate about community service, Thomas has volunteered with the United Way and served as a board member for Corner to Corner. He is driven by a deep commitment to giving back and creating opportunities for others through both his professional work and civic engagement.

Pam Lehman currently serves as the Manager of Strategic Initiatives for the Tennessee Public Charter School Commission. She holds a B.A. in English from the University of Wisconsin-Madison and an M.A. in Curriculum and Instruction from the University of Mississippi. Pam began her career in education as an English Language Arts teacher, having taught abroad in Phnom Penh, Cambodia as well as in Mississippi Public Schools and Metro Nashville Public Schools. Prior to joining the Charter Commission, she worked in education research at Vanderbilt University and served in the Division of Choice at the Tennessee Department of Education.

Maggie Lund is the Deputy Director of Authorizing at the Tennessee Public Charter School Commission. Additionally, she serves as an adjunct professor in the Lipscomb College of Education Master's Program, teaching Planning, Instruction, and Assessment and Building Classroom Communities. Prior to her role at the Charter Commission, Maggie served as a school administrator at a Nashville public charter school. Maggie was a Teach for America corps member and served as an 8th grade teacher in a charter school for four years. Maggie holds a B.A. in Business Administration and Marketing from Loyola University New Orleans, a Doctor of Education degree, and a Master of Education degree with a specialization in English Language Learning from Lipscomb University. Her dissertation research focused on Restorative Justice Practices and school culture. Most recently, her research article, Mindsets Matter for Equitable Discipline was published in the Middle School Journal.

Claire Seguin is currently serving as the Federal Programs Coordinator at the Tennessee Public Charter School Commission. Prior to joining the Commission, Claire spent thirteen years working



with special populations and school administration in K-8 charter schools in Nashville. Claire holds a B.A. in Sociology and Disaster Science Management from Louisiana State University, a Master of Education with specializations in Special Education and English Language Learning from Lipscomb University, and graduate certificates in Autism Studies and Applied Behavior Analysis. She has contributed to published research on the impact of parental involvement on academic achievement and currently provides advocacy support for families of students with disabilities in public schools.

Erin Solomon, an independent education consultant, focuses primarily on providing wide-ranging support to public schools, departments of education, authorizers, and charter school incubators. Prior to consulting, Erin was the Director of Teacher Leadership Systems and Sustainability at the New York City Department of Education (“NYC DOE”). There, she managed a 52 million dollar US Department of Education Teacher Incentive Fund grant, and led all policy-making decisions for Teacher Career Pathways (“TCP”), the NYC DOE's primary teacher leadership program. Additionally, she led the district-wide evaluation of TCP's impact on student academic achievement across all partner schools. Erin also worked as a program manager and authorizer for The New York State Education Department Charter School Office. There, she managed a federal dissemination grant which promoted collaboration and the dissemination of best practices between 32 charter and district schools across New York. As a charter school authorizer, she oversaw a portfolio of NYSED charter schools and led charter school site visits, which informed schools’ renewal decisions. Erin began her career in education with Teach For America at a turnaround school in Phoenix, Arizona, and continued teaching as a founding teacher at Achievement First. She earned a Master of Urban Education Policy from Brown University and a Master of Education from Arizona State University.

Jeff Wasbes Jeff Wasbes is a consultant working closely with charter schools and charter school authorizers on strategic planning and systems improvement. Prior to starting his consultancy in 2024, he served as the Executive Deputy Director for Accountability for the SUNY Charter Schools Institute in New York where he specialized in developing, implementing, and refining systems for evaluating the quality of charter applications and schools. Mr. Wasbes was a high school math teacher and a program evaluator focusing primarily on teacher quality improvement programs prior to joining the SUNY team. Jeff holds a Master of Public Administration degree with a specialization in decision making and management systems.