



Executive Director's Recommendation Still I Rise Academy 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 4, 2025, the sponsor of Still I Rise Academy ("sponsor" or "Still I Rise") 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 Still I Rise 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 the MSCS Board of Education to deny the amended application for Still I Rise.

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 Still I Rise 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, financial plan and capacity, and portfolio review and performance record)]."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 Still I Rise to MSCS on February 3, 2025.
2. MSCS assembled a review committee to review and score the Still I Rise initial application.
3. On March 6, 2025, MSCS's Review Committee conducted a capacity interview with representatives of Still I Rise.
4. MSCS's Review Committee reviewed and scored the Still I Rise initial application, indicating concerns with the academic model and programming, governance structure and long-term sustainability, community support, 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 Still I Rise initial application.
6. The sponsor amended and resubmitted its application for Still I Rise to MSCS on May 30, 2025.
7. MSCS's Review Committee reviewed and scored the Still I Rise amended application based on the charter application-scoring rubric and rated the academic and operations sections as partially meets the standard and the finance section as does not meet the standard.
8. On July 29, 2025, the MSCS Board of Education voted to deny the amended application of Still I Rise.
9. The sponsor appealed the denial of the Still I Rise amended application in writing to the Commission on August 4, 2025, including submission of all required documents per Commission Policy 2.000.
10. The Commission's Review Committee independently analyzed and scored the Still I Rise amended application using the Tennessee Department of Education's charter school application-scoring rubric.
11. On September 10, 2025, the Commission staff held a public hearing at the 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

⁴ T.C.A. § 49-13-108.

received public comment regarding the Still I Rise amended application.

12. The Commission’s Review Committee conducted a capacity interview with key members of the Still I Rise leadership team on September 24, 2025 via Microsoft Teams.
13. After the capacity interview, the Commission’s Review Committee determined a final consensus rating of the Still I Rise 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 Still I Rise initial application consisted of the following individuals:

Name	Title
Kimberly Adams	MSCS Federal Programs, Charter and Training Schools Senior Manager
Samuel Bachelor	MSCS Virtual Education, Specialty Principal
Cheryl Cathey	MSCS Alternative Schools Analyst
Lershone Clark	MSCS Student Information Management Analyst
Ronnie Clark	MSCS Professional Development, Academic Leadership Support Manager
Halli Faulkner	Expert External Reviewer
India Fowler	MSCS Business Operations-Facilities, Executive Assistant
Cabrida Grady	MSCS Office of Charter Schools, Advisor School Development
Angela Hodges	MSCS Community Outreach and Partnerships, Alumni Affairs Advisor
Marian Kelley	MSCS Exceptional Education, Charter Advisor
Teneisha McNeil	MSCS Multilingual Learners, Charter Advisor
Brittany Monda	Expert External Reviewer
Edranyce Monrore	Parent/Community Reviewer
Thomas Perry	MSCS Office of General Counsel, Associate General Counsel
Arlishia Sherrod	MSCS Nutrition Services, School Operations Manager
James Smith	MSCS Optional School, Advanced Placement Manager
Emily Spann	MSCS Enrollment and Attendance Advisor
Dena Vaughn	MSCS Curriculum and Instruction Advisor
Gloria Webster	MSCS Mental Health and Wellness, Regional Manager

Name	Title
Andrea Williams	MSCS Recruitment and Staffing, HR Talent and Support
Audrey Williams	MSCS Transportation Director

The Still I Rise initial application received the following ratings from the MSCS Review Committee:

Sections	Ratings
Academic Plan and Design	Partially Meets 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 Still I Rise.

District Denial of Amended Application

The Review Committee assembled by MSCS to review and score the Still I Rise amended application consisted of the following individuals:

Name	Title
Kimberly Adams	MSCS Federal Programs, Charter and Training Schools Senior Manager
Samuel Bachelor	MSCS Virtual Education, Specialty Principal
Cheryl Cathey	MSCS Alternative Schools Analyst
Lershone Clark	MSCS Student Information Management Analyst
Halli Faulkner	Expert External Reviewer
India Fowler	MSCS Business Operations-Facilities, Executive Assistant
Cabrida Grady	MSCS Office of Charter Schools, Advisor School Development
Marian Kelley	MSCS Exceptional Education, Charter Advisor
Teneisha McNeil	MSCS Multilingual Learners, Charter Advisor
Brittany Monda	Expert External Reviewer
Edranyce Monrore	Parent/Community Reviewer
Thomas Perry	MSCS Office of General Counsel, Associate General Counsel
James Smith	MSCS Optional School, Advanced Placement Manager
Emily Spann	MSCS Enrollment and Attendance Advisor
Dena Vaughn	MSCS Curriculum and Instruction Advisor
Gloria Webster	MSCS Mental Health and Wellness, Regional Manager
Andrea Williams	MSCS Recruitment and Staffing, HR Talent and Support Manager
Audrey Williams	MSCS Transportation Director



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	Partially Meets 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 Still I Rise.

Commission Review Committee’s Evaluation of the Application

Following the denial of the Still I Rise 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 Still I Rise amended application. This Review Committee consisted of the following individuals:

Name	Title
John Bowyer	Commission Staff
Lizzie Eisen	External Consultant
David Hartman	External Consultant
Maggie Lund	Commission Staff
Whitney O’Connell	External Consultant

The Commission’s Review Committee conducted an initial review and scoring of the Still I Rise 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 Still I Rise 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 Still I Rise 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 Academic Plan and Design does not meet the standard as there was a lack of clarity surrounding the school's proposed academic model, daily schedule, and how their academic goals would be measured. Additionally, the applicant did not outline a sufficient plan to serve special populations of students, and it was unclear who on the leadership team would be responsible for oversight of student identification and continuum of services. Further, the sponsor did not provide adequate recruitment and enrollment plans for the school. The applicant aims to open as an opportunity public charter school which means the school must adhere to additional requirements for enrollment such as maintaining a population of 75% at-risk students in alignment with legislative requirements. The applicant did not provide adequate information to ensure that the school would remain compliant as an opportunity public charter school or that sensitive student records would be appropriately maintained.

The applicant's Operational Plan and Capacity does not meet the standard due to issues with clarity as to the governing board, inconsistencies with the staffing plan, and insufficient facility plans and start-up timelines. The outlined sponsoring entity within the application is the Humanitarian Outreach Group, however within the capacity interview the applicant stated that the school is being governed by a new board entity, the "Shelby County Charter Group." 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. Additionally, the applicant's staffing plan had multiple inconsistencies between the application narrative, the budget, and what was stated within the capacity interview. Finally, the applicant did not provide sufficient facility plans and start-up timelines.

The Financial Plan and Capacity lacked adequate contingency plans should enrollment not materialize as outlined or additional dollars be needed to cover staffing or other operational expenses. The applicant also did not provide clear information as to who would be responsible for oversight of finances for the school, citing the principal would have this responsibility in the capacity interview though the application does not outline this within.

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 Still I Rise 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 and the reasons for denial of the application. Representatives from MSCS indicated that the Still I Rise Academy amended application was denied because the application partially met the standard for academics, partially met the standard for operations, and did not meet the standard for finance. Representatives from MSCS further explained district programs specifically focused on the service of at-risk youth and ultimately stated that the denial decision of the application came from deficits in all areas of the application and problems with the execution of the intended model to support the goals of an opportunity public charter school.

In the sponsor's opening statement, the attorney representing the proposed school along with the executive director described the purpose of Still I Rise Academy and its intent to support how the legislature has invested in a new way to meet the educational needs of at-risk youth through opportunity public charter schools. The sponsor elaborated on the executive director's experience serving at-risk youth and outlined the need for the school, given the approximately 24,000 middle and high school students who are chronically absent. The sponsor cited a survey the applicant administered in which 90% of respondents supported a school for at-risk youth, and the sponsor stated that they would receive the Charter School Program ("CSP") grant issued by the Tennessee Department of Education for \$750,000. The sponsor described their facility readiness, including multiple contingency plans, and the intent to work with a back-office provider. Finally, the sponsor spoke about the strength of the governing board, stating that they are one of the only nonprofits in the state to be recognized by the United States Senate for entrepreneurship.

During questioning by the Commission, representatives from MSCS described the instructions provided to applicants between the initial and amended applications, including opportunities to discuss the feedback and any questions the operator may have. Additionally, members of the Review Committee were provided specific instructions on how to document if certain sections of the application were not amended and how to provide feedback about the sponsor's response. The Commission then asked questions about the district's enrollment concerns for the school, and representatives from MSCS stated that the applicant did not provide a sound plan for engaging parents in student recruitment. Additionally, the application did not clearly articulate data to support how the school would serve at-risk students outside of

⁵ T.C.A. § 49-13-108.

what the district already provides. The district stated that any of the programs to support at-risk students do not have waitlists or the waitlists are not lengthy. Representatives then elaborated on the governance concerns for the school. The district stated that the governing boards and governing board members of the sponsoring organization and charter school should be different, as there are differing responsibilities. If these two entities are the same, there should be clear lines of demarcation between the governing board and the roles of the sponsor to ensure there are no conflicts of interest. Finally, representatives from the district explained that the outlined locations for the school are all over the city and that there were concerns about the outlined plan for facility renovations.

The Commission then questioned the sponsor about how the academic model and approach will be different or innovative in support of the eight at-risk categories of students as outlined in legislation for opportunity public charter schools. The sponsor stated that the targeted model is small classroom sizes, personalized pathways, and project-based learning. They also have a relationship with William and Johnson Career College that allows for workforce integration and will offer a later start time and flexible scheduling for credit recovery, which will all help to prevent chronic absenteeism. When asked about who on their team would be responsible for the academic programming of the school, the sponsor stated that this would be the principal whom they will hire. The sponsor then described how they intend to ensure stable enrollment through marketing and outreach, and they also intend to do social media ads, billboards, and magazine ads for the school. The sponsor clarified that they intend to operate grades sixth through twelfth in Year 1 due to many families having multiple children in different grade levels, so this provides the opportunity to capture the whole family. Additionally, the sponsor stated the school could be fiscally solvent with fifty students. When the Commission questioned the sponsor about governance capacity, the sponsor responded that there are no conflicts of interest on the board, and they are aligned with statute in terms of nonprofit entities operating a public charter school. Additionally, the sponsor clarified that Dr. Kiner would serve as the executive director of the school, and until the school is sustainable, he would not take a salary. Finally, the sponsor stated that they believe they exceeded the state expectations for identifying a facility and outlined numerous possible locations and have contingency plans. The sponsor clarified that they have not received any information as to the cost of renovations for the facility, as the district did not provide this information, so their assumption is that the buildings would be classroom-ready.

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 Still I Rise. The Commission also accepted written comments, and the Commission received forty-eight written comments, with three writing in support of MSCS and forty-five writing in

support of Still I Rise.

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 Still I Rise amended application did not rise to the level of meeting or exceeding the standards required for approval.

I agree with the Review Committee that the academic plan does not meet the standard for approval. Opportunity public charter schools, new to the State of Tennessee, and are intended to serve a specific population of students. T.C.A. § 49-13-104(3) identifies eight criteria that qualify a student to be considered at-risk for the purposes of these types of charter schools. It is imperative that any application approved is intentional in mission and vision to attract the at-risk populations that it is designed to serve. Additionally, a sponsor operating an opportunity charter school is responsible for ensuring that at least 75% of the students enrolled are classified as at-risk students. Only a clearly defined academic plan designed intentionally for these vulnerable populations meets the standard for approval.

The sponsor’s application fails to identify a clear academic model or specific goals that contribute to academic success. Throughout the evaluation of the application, the sponsor named multiple approaches to the academic plan, but it was unclear how all of the proposed aspects of the model would work together to meet student needs. Additionally, the sponsor indicated during the capacity interview that an academic goal is that students would experience one full year of academic growth within the model. However, the population of students served

⁶ T.C.A. § 49-13-108.

by an opportunity public charter school has historically tested multiple grade levels behind, and, as such, one year of growth would not result in bringing them to grade-level proficiency. Instead, these students would likely remain below proficiency levels according to the school's outlined goals. The sponsor testified that the academic model would offer full wraparound services and include flexible scheduling, but evidence suggests that key components of the academic model would be sacrificed in the process. For example, as named by the Review Committee, the Empower Hour was identified as a part of the daily schedule. The sponsor testified that during this time, students would receive social emotional learning and Response to Instruction and Intervention ("RTI²"). However, the sponsor stated that Empower Hour would last only thirty minutes, which does not satisfy all components of a successful academic plan, and it is unclear how all these components would be fulfilled within the thirty-minute span. In totality, the applicant did not present a clear academic plan with a likelihood of increasing academic results, and I cannot recommend approval of an application where the academic plan lacks clarity.

Like all charter schools, the sponsor would be responsible for ensuring the continuum of services to special populations, including students with disabilities and English learners. The sponsor anticipated that Still I Rise would attract a student population serving 10% students with disabilities and 10% English learners. Since the school plans to be an opportunity charter school, there is a likelihood that these student groups would be higher than these projections, but the applicant did not provide sufficient detail to support how these estimates were derived. Additionally, the plan to serve students with disabilities and English learners was underdeveloped and lacked clear details, including who on the team would be responsible for oversight and compliance at the school. A comprehensive and detailed plan to serve special populations is required for approval, and because the sponsor's application did not sufficiently address the school's plan for serving students with differing needs, I cannot recommend approval of the application.

I agree with the Review Committee that the sponsor's Operational Plan and Capacity does not meet the standard for approval. A charter agreement is a ten-year commitment between the Commission and the governing board of a charter school. Therefore, it is imperative that during the application process, the authorizer can accurately assess the governing board's capacity to provide oversight and control of the charter school. Dr. Kiner testified during the public hearing that the governing board is one of the only nonprofits to be recognized by the United States Senate for entrepreneurship. I commend Dr. Kiner and his team on this recognition; however, the sponsor's application left questions regarding the structure and management of the charter school. The sponsor's application named various potential members of the governing board, all of whom submitted their background and experience. However, during the capacity interview, the sponsor indicated that Still I Rise would be governed by a new entity, with separate

governing board members, some of whom were not listed in the amended application. I cannot recommend approval of an application when I have not had the opportunity to review the members of the governing board and assess their capacity for oversight and monitoring of the charter school.

The sponsor's operations plan also lacks specificity regarding its staffing plans. The sponsor's application highlighted critical positions for the success of the school serving at-risk populations of students. However, the application failed to indicate how many of each position would be required for the school. This is an essential detail, especially considering the sponsor's stated plan to open Still I Rise with grades sixth through twelfth in Year 1. The sponsor testified that the school intends to employ counselors, psychologists, and an assistant principal during the capacity interview. However, the application only indicates that a guidance counselor would be staffed during the first three years of operation. The sponsor also failed to indicate how it would recruit teachers and staff throughout the life of the charter agreement, and without these fundamental functions determined, I cannot recommend approval of this application.

Additionally, I share in the Review Committee's concern regarding the facility plans set forth in the application. The sponsor listed several facility options in the amended application and at the public hearing, but the sponsor also indicated during the public hearing that they had no information related to renovation costs of any intended facility. The sponsor's testimony assumes that the district would have completed some level of due diligence on the list of unused or underutilized properties, which is mistaken. The sponsor is responsible for completing due diligence on facility options, including but not limited to feasibility studies for any necessary renovations. This was not evidenced in this application, and I cannot find that the sponsor's facility plans meet the standard. Further, during the capacity interview, the sponsor named an alternate facility as its desired location, which was different from any listed in the application. Since there is no information contained within the application on this facility option, I cannot determine whether the newly named facility option is feasible for the sponsor's academic model or whether the financial budget is viable in light of this selection. My consideration regarding facilities is compounded by the sponsor's testimony during the capacity interview of an intent to delay opening for one year. The Commission cannot approve an application for a charter school on a contingency and will only approve high-quality schools that are ripe for opening, in accordance with its charge under the Tennessee Charter Law. Based on the sponsor's anticipated start date of fall 2026, I find that the sponsor's operational plan does not meet the standard for approval.

Finally, I agree with the Review Committee that the sponsor's Financial Plan and Capacity does not meet the standard for approval. The sponsor earmarked the \$750,000 CSP grant as the source of funding for Year 0 of Still I Rise Academy. Currently, the sponsor's receipt of the CSP

grant is conditioned on approval. However, the sponsor only named the CSP grant in the pre-opening year and did not identify a contingency plan to support the establishment of the school, as expenses undoubtedly change. The sponsor did not clearly identify who on staff would be responsible for overseeing the day-to-day management of the finances. Within the application, it was named to be the executive director; however, in the capacity interview, it was named to be the principal. Overall, there lacks a clear plan for day-to-day management of finances at the school and who at the school will work with the financial back-office provider. Without internal structures in place, it is unclear if the school has the appropriate policies, procedures, and personnel to meet the standard for approval within the financial plan.

The sponsor did not sufficiently address its contingency plans should funding not materialize. The sponsor's stated plan is to start with all grade levels, sixth through twelfth grade, in Year 1 with 150 students but testified that the school would be financially viable with as few as fifty students. There was no evidence provided to support this contingency beyond the sponsor's testimony that staff would be cut if financial changes are required. I am concerned about this contingency plan because to successfully operate an opportunity public charter school, the sponsor is expected to address very specific requirements based on the population of students being served. Given the unknowns regarding the facility and facility renovations, staffing, and enrollment, it is not clear if the school can remain financially viable on the CSP grant alone. In totality, there was a lack of evidence to demonstrate that the financial plan meets the standard for approval.

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.

For the reasons expounded on in this report, I recommend that the Commission deny the Still I Rise 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 Still I Rise 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 Still I Rise.

A handwritten signature in cursive script that reads "Tess Stovall".

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: Still I Rise Academy

Sponsor: Humanitarian Outreach Development Group, Inc.

Proposed Location of School: Memphis-Shelby County Schools

Evaluation Team:

- John Bowyer
- Lizzie Eisen
- David Hartman
- Maggie Lund
- Whitney Noel



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: Still I Rise Academy

Sponsor: Humanitarian Outreach Development Group, Inc.

Proposed Location of School: Memphis-Shelby County Schools

Mission: Still I Rise Academy is committed to empowering Tennessee’s most vulnerable youth by providing a supportive, student-centered learning environment that fosters academic success, personal growth, and resilience.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:
6	30	45	55	60	90	160
7	20	40	50	60	80	170
8	20	40	50	60	80	170
9	20	35	45	55	70	140
10	20	35	45	55	70	140
11	20	30	35	50	55	110
12	20	25	35	50	55	110
Totals	150	250	315	390	500	1000

Brief Description of the Application

The sponsor, Humanitarian Outreach Development Group, Inc., is proposing to open an opportunity public charter school in Shelby County, Tennessee and serve students in sixth through twelfth grade when fully built out. The school, Still I Rise Academy (“Still I Rise”), is a new-start opportunity charter school and would be the first school for the sponsor. The school intends to operate in the city of Memphis in Shelby County to serve students “who have previously dropped out, been retained twice, are chronically absent, are pregnant or parenting, or have experienced abuse or neglect.”⁵ The school proposes to offer a student-centered,

³ Still I Rise Academy Amended Application, pg. 11

⁴ Still I Rise Academy Amended Application, pg. 83

⁵ Still I Rise Academy Amended Application, pg. 11



evidence-based model for students who meet the eligibility for opportunity charter schools and provide students in the city of Memphis an additional school option.

The proposed school will be governed by a board, Humanitarian Outreach Development Group, comprised of educators, lawyers, and other industry professionals, with committees focusing on academic excellence, finance and operations, student and family support, and governance and compliance. In Year 0, Still I Rise budgeted \$750,000 in revenues from the Charter School Program ("CSP") grant and projects \$508,750 in expenses for the school. Still I Rise projects the school will have \$2,130,626 in revenue and \$1,964,750 in expenses in Year 1, resulting in a balance of \$407,126. By Year 5, the school projects to have \$6,985,419 in revenue and \$5,201,563 in expenses, resulting in a positive ending fund balance of \$4,570,812.⁶ 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% English learners.⁷

⁶ Still I Rise Academy Amended Budget

⁷ Still I Rise Academy Amended Application, pg. 84

Summary of the Evaluation

The Review Committee recommends the denial of the amended application for Still I Rise 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 academic plan does not meet the standard as the sponsor did not provide sufficient recruitment and enrollment plans for the school. The applicant aims to open as an opportunity public charter school which means the school must adhere to additional requirements for enrollment such as maintaining a population of 75% at-risk students in alignment with legislative requirements. The applicant did not provide adequate information to ensure that the school would remain compliant as an opportunity public charter school or that sensitive student records would be appropriately maintained. Further, there was a lack of clarity surrounding the school's proposed academic model and daily schedule and how their academic goals would be measured. Finally, the applicant did not outline a sufficient plan to serve special populations of students, and it was unclear who on the leadership team would be responsible for oversight of these services.

The applicant's Operational Plan and Capacity does not meet the standard due to a lack of clarity as to the governing board for the school. The outlined sponsoring entity within the application is the Humanitarian Outreach Group, however within the capacity interview the applicant stated that the school is being governed by a new board entity the "Shelby County Charter Group." 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. Additionally, the applicant's staffing plan had multiple inconsistencies between the application narrative, the budget, and what was stated within the capacity interview. Finally, the applicant did not provide sufficient facility plans and start-up timelines.

The financial plan lacked adequate contingency plans should enrollment not materialize as outlined or additional dollars be needed to cover staffing or other operational expenses. The applicant also did not provide clear information as to who would be responsible for oversight of finances for the school, citing the principal would have this responsibility in the capacity interview though the application does not outline this within.

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 standard because there is insufficient evidence that enrollment targets would be met as outlined, the applicant's plan to recruit, retain, and maintain records of at-risk youth is limited, the academic model and goals are unclear, and the school lacks a sound plan to serve special populations of students.

Still I Rise aims to operate as an opportunity public charter school serving at-risk youth in Memphis and plans to open grades sixth through twelfth in Year 1 with 150 students. While the Review Committee honors the passion of the sponsor and the intent to serve this vulnerable population, the plan to recruit and enroll students was underdeveloped. While the applicant outlines clear data points demonstrating a need to serve this vulnerable population of students within the application, there is insufficient information as to how the applicant intends to reach this population and enroll them in the school. The sponsor referenced a survey sent to community members as evidence of community demand, though it is unclear if the survey respondents were parents of at-risk youth who would be qualified to enroll at the school. Additionally, the applicant lacked clear plans to maintain all required documentation for students, and when asked in the capacity interview regarding these plans, the response lacked detail in alignment with the requirements of the statute. To operate as an opportunity public charter school a sponsor must meet additional requirements for enrolling at-risk students and given the limited demonstration of community support and insufficient recruitment plan, it is unclear if enrollment will materialize as projected within the application.

The school's academic plan and goals lack clarity and do not provide differentiation between the multiple at-risk categories of students the school aims to serve. The academic goals in alignment with the mission and target population served are not measurable. When asked how the school would measure these goals in the capacity interview, the sponsor stated that they would ensure students make one full year of growth to catch students up to grade level; however, this will likely not result in adequate progress toward grade level for student who are behind. Additionally, there were multiple discrepancies regarding key components of the outlined academic model throughout the application, particularly regarding the Empower Hour portion of the daily schedule. When asked about this during the capacity interview, the sponsor clarified that Empower Hour would be thirty minutes in length. This length of time would not satisfy the multiple components of the model taking place during this time such as social emotional learning instruction and Response to Instruction and Intervention ("RTI²"). The sponsor also mentioned multiple different academic foci within the application including project-

based learning, competency-based learning, and trauma-informed practices, but it is unclear how all these components work together to form an innovative and cohesive model to serve at-risk youth.

Finally, the applicant did not provide a sound plan to serve special populations of students. 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 context on how these projections were determined. Additionally, it was unclear from the application and capacity interview as to who on the school's leadership team would be responsible for oversight and compliance for servicing special populations of students. Within the outlined roles and responsibilities for the principal, oversight of special populations of students was not mentioned. There were also discrepancies between the special populations staff outlined within the application narrative and the budget, and the applicant's response did not provide a clear process for identifying and providing a continuum of services for students with disabilities.

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 standard due to an unclear delineation between the sponsoring entity and the governing board, inconsistencies with the outlined staffing plan, and an insufficient facility and start-up plan.

The application states that the sponsoring entity and proposed governing board is the Humanitarian Outreach Group, a Memphis-based nonprofit organization, and its bylaws and board members' backgrounds are included within the application as required. However, during the capacity interview, the Review Committee asked for clarity about the board members and their capacity to open and effectively govern a charter school. The applicant cited different board members than those listed within the application, stating that they were part of a new governing entity, the "Shelby County Charter Group." 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.

Throughout the application narrative, there were multiple discrepancies in the staffing plan, and roles and responsibilities of the principal. There were positions named within the application narrative that were not reflected within the budget such as an RTI² coordinator, a work-based learning coordinator, and a professional development coordinator. Additionally, when asked about the responsibilities of the principal in the capacity interview, the sponsor stated that they will have counselors, psychologists, and an assistant principal who will support the principal to ensure stability of the model and effective leadership, though only a guidance counselor was cited in the budget in Years 1-3. The application also did not outline a strong 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. When asked about this in the capacity interview, the sponsor stated that the outlined salaries are not below the local district, but instead they intended to use the minimum allocations based on experience to budget conservatively and demonstrate financial soundness. However, it is unclear how the applicant would fund salaries for staff who are more experienced, given that they also intend to use contingency dollars for other purposes within the application.

The sponsor's facility and start-up plans outlined multiple facility options that are available within the local district, and during the capacity interview, the applicant named

a desired facility. However, the applicant did not provide information as to what renovation efforts may be associated with the desired facility or if any evaluation had been conducted on the feasibility of the renovations. The applicant stated that all facility-related expenses would be covered by the \$750,000 CSP grant. However, it remains unclear whether the entirety of the proposed expenditures fall within the grant's allowable uses, and no contingency plan was provided should actual costs exceed the allocated amount. 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 sponsor'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, the applicant's start-up timeline and facility acquisition process lacked detail regarding contingency planning and realistic renovation planning.

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 standard because the applicant did not outline sound financial contingency plans and did not outline clear responsibility for financial oversight of the school.

The applicant's budget outlines a \$750,000 CSP grant as their sole source of start-up funding in Year 0 with TISA allocations and \$50,000 in private foundation grants and fundraising in Year 1. From questioning about the facility in the capacity interview, there was a lack of information regarding where contingency funds would come from if renovation or acquisition costs for a facility are higher than the allocated funds. Further, when asked how the applicant would adjust their staffing plan if enrollment does not materialize as projected within the application, the sponsor stated that they would be financially viable with fifty students. However, given the multiple inconsistencies with positions named within the application and in the capacity interview that are not within the budget, it was unclear how the applicant would adjust expense assumptions and the staffing and student-teacher ratios to remain fiscally solvent with fifty students. The applicant clarified in the capacity interview that they would cut any staff who are not state-mandated, though this raises questions about effective implementation of the outlined academic model to serve at-risk youth and the critical nature of some of the positions, such as counselors and social workers, outlined within the application. Ultimately, the applicant referred to multiple contingency plans that would require additional expense assumptions, and it was not clear as to how the myriads of costs would be covered. The outlined contingency plans did not adequately address higher than anticipated costs or lower than anticipated enrollment.

Information in terms of financial management of the organization was contradictory between what was stated within the application and at the capacity interview. During the capacity interview, the applicant cited that the principal would be responsible for financial oversight of the school, though this was not included within the job description for the principal in the application nor listed as required experience. Therefore, there is no evidence that the person who would be hired to oversee the financial functions of the school would have the necessary experience to ensure proper financial oversight. 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.



Evaluation Team

John Bowyer is the English Learner Program Coordinator with the Tennessee Public Charter School Commission. Prior to working with the Commission, he held several roles in education including ELA teacher, EL Coordinator, and most recently the Assistant Principal of Student Support Services at KIPP Antioch College Prep Middle School. He holds a BA in Sociology from Appalachian State University and a Master of Education degree from Lipscomb University. John has a passion for multilingual students and ensuring they have equitable access to a high-quality education.

Lizzie Eisen has over 14 years of experience in K-12 education as a teacher, school leader, and consultant. She began her career as an elementary school teacher. Lizzie was on the founding team and later served as K-8 Principal at Nashville Classical Charter School. Since 2022, Lizzie has consulted with more than 60 schools in Tennessee and nationally, focusing on teacher and leader development, instructional improvement, and school growth. She has particular expertise in literacy curriculum and instruction, professional development, and school design and operations. Her combined experience in the classroom, school leadership, and consulting provides a broad perspective on effective school practice.

David Hartman is the founder of Venn Education, he specializes in expert evaluation, smart change making, and high-stakes decisions based on evidence. He spent over 10 years as the Managing Director of Accountability and Authorizer Supports with SchoolWorks. He served the Minnesota Department of Education, where he led the design and implementation of the nation's first high-stakes charter school authorizer performance evaluation. Notable engagements include leading and developing statewide charter school authorizer evaluations in Ohio and Tennessee, turnaround of an alternative high school, strategic planning for a state association, and numerous school reviews. In addition, David has taught in high schools and universities.

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*.

Whitney Noel has served as a reviewer for the Tennessee Public Charter School Commission since 2018. She is the Founding Curricular Solutions Architect at Brisk Teaching and has advised and worked in organizations including Newsela, Mosa Mack Science, Snorkl, and Gates Ventures on curriculum design and implementation. Whitney also worked with the International Bureau of Education at UNESCO, contributing to global efforts in curriculum and instructional design. Earlier in her career, she taught in public, private, and charter schools in Washington State, Honduras, and Nashville, TN. She holds a Master's degree in Education with certification in English Language Learning from the University of Washington and a Bachelor of Arts in History, Spanish, and Latin American Studies from Gustavus Adolphus College. Whitney is passionate about creating engaging, rigorous, and inclusive learning experiences for all students.