



June 20, 2025

Tess Stovall, Executive Director
Tennessee Public Charter School Commission
500 James Robertson Parkway
5th Floor, Davy Crockett Tower
Nashville, TN 37243

Executive Director Stovall,

Please consider this letter as **The Rock Academy of Nashville's ("The Rock Academy")** official appeal of the denial of our new start charter application on June 10, 2025 by the Metropolitan Nashville Public Schools ("MNPS") Board of Education.

The Rock Academy is a proposed, first of its kind, single-site, 9th-12th grade Opportunity Public Charter School in Nashville, TN. The mission of The Rock Academy is to re-engage disconnected youth to ensure success in the postsecondary pathway of their choice. We envision a world where all young people have **the power** to shape their own futures, and The Rock Academy will be a foundation for this success.

Pursuant to Tennessee Code Annotated §49-13-10, we respectfully appeal MNPS's denial of our application based on the following:

(1) Our application met or exceeded the metrics outlined in the department of education's application scoring rubric:

While the MNPS review committee assigned our amended application ratings of Partially Meets Expectations in all categories, we believe that The Rock Academy has met or exceeded expectations of the department's scoring rubric in all sections.

Throughout the review process, the MNPS Board, the review committee, and Superintendent of Schools provided feedback and made statements that were not in alignment with TDOE guidance around scoring. Additionally, there were frequent references regarding Opportunity Schools that demonstrated a misinterpretation by the reviewers and staff regarding the nature and structure of the school. The Rock Academy believes that this resulted in an inaccurate scoring of the application. Here are a few examples:

- a. The review committee and the board repeatedly voiced concerns about The Rock Academy's design being unnecessary as it was duplicative of current Alternative Learning Centers and Simon Youth Academies which the district already operates. As outlined in section (2) of this document, Opportunity Public Charter Schools are structurally and statutorily different from ALCs and Simon Youth Academies, making this feedback - and its implications on the application scoring - misaligned to facts and statute.
- b. The board voiced concerns about The Rock's financial planning, specifically that - while our budget did reflect a realistic accounting of the program costs - our goals for fundraising were unrealistic. To date, The Rock Academy has raised \$1.25 million - in excess of projected goals by this time in the



year. Additionally, we outlined a robust sustainability plan detailing how we will approach fundraising, pursue equitable funding, and adjust programming in the event of any budget shortfalls.

- c. While the official motion for denial was made based on the review committee’s ratings, much of the board discussion and debate in advance of voting centered around the board’s frustration regarding the cost of charter schools to an already cash-strapped budget. While we have empathy for the complex district budgeting process, state law does not permit this as a rationale for denying a charter. There are provisions for considering negative fiscal impact, however those specific criteria were neither cited nor met.

We look forward to discussing these issues and others with the Commission in further detail

(2) The approval of the amended charter is in the best interests of the students, the LEA and the community:

Nashville youth are in crisis. A third (33.6%) of Nashville high school students - roughly 6,500 students - are chronically absent.¹ The State of Tennessee defines chronic absenteeism as “...a student missing 10 percent or more of the days the student is enrolled-for any reason...”². Research shows that “Tennessee students who are chronically absent in ninth grade are 30 percentage points less likely to earn an on-time diploma (62% vs. 92%).³ Long-term, the data for students who do not complete high school is bleak. It is linked to poor outcomes throughout adult life, from poverty and diminished health⁴ to involvement in the criminal justice system.⁵

In recognition of this widening gap, the state of Tennessee created a new pathway to serve this growing at-risk student population: Opportunity Public Charter Schools. Tennessee Code Annotated 49-13-104, defines an Opportunity Public Charter school as “a public charter school serving any of the grades six through twelve for which at least 75% of the students, at the time of enrollment, are at-risk students.” The law was passed in part because the sponsors understood that this student population needed something different in order to achieve success. Traditional systems were not serving them - and continuing to rely on those same systems would only perpetuate the same outcomes.

The Rock Academy is proposing Tennessee’s first such Opportunity Public Charter School - a school designed, from top to bottom, to serve at-risk youth. This focus allows our school to design a school *FOR* these students, not *AROUND* them. And it is sorely needed. In Nashville, nearly a third of all chronically absent high schoolers attend one of four high schools; Antioch, John Overton, McGavock and Cane Ridge High Schools. All of these schools have a graduation rate significantly lower than the state or the district, a state report card grade of a D or an F, and an achievement rate between 9.10% - 15.9%. These data have remained the same or worsened year after year.

During the application process, MNPS often referenced its Alternative Learning Centers and Simon Youth Academies as a way to illustrate the duplicative and unnecessary nature of The Rock Academy. However, this is an illogical comparison. The Rock Academy would be the only longitudinal placement for rising or

¹ 2024 MNPS' Open Portal Data

² <https://www.tn.gov/education/families/student-support/chronic-absenteeism.html>

³ Ibid.

⁴ <https://www.nber.org/papers/w12352>

⁵ <https://justicepolicy.org/research/education-and-public-safety-policy-brief/>



repeat at-risk 9th graders in Nashville - where students could proactively enroll to spend their entire high school career in a school designed to cater to their needs.

By comparison, students serving extended suspensions or expulsions can attend an Alternative Learning Center for a maximum of one school year. By statute, ALCs are inherently temporary placements, where attendance is optional for students. Students can pursue HiSet completion or credit attainment while at an Alternative Learning Center, but at the end of their suspension or expulsion term, they return to their school of zone. While day to day enrollment in ALCs varies, last year fewer than 100 students attended ALCs in Nashville.

Additionally, there are three Simon Youth Academies in Nashville. All require attendees to be between the ages of 17-21, and require that they are missing eight or fewer credits of the 22 necessary to graduate. Meaning, they must have completed more than 60% of the coursework and dropped out of their traditional school placement in order to be eligible to attend. In addition, The Academy at Opry Mills requires that “the students we serve must have a strong desire to complete their high-school education, as exhibited by no history of truancy and no record of suspension of 10 or more days per school year.” In SY23-24 just 132 students attended one of the three Simon Youth Academies in Nashville.

Taken together, ALCs and Simon Youth Academies serve less than 1% of Nashville High School Students. And a Rock Academy Student would be ineligible to attend either. The vast majority - 99% - of MNPS high school students attend a traditional high school program. And no program is designed to specifically serve the student population identified in the Opportunity Youth legislation or in The Rock Academy’s application.

There are literally thousands of students dropping out of high school and/or approaching drop-out each year. And these students need and deserve an option built for them – that supports them in achieving their fullest potential. As a result, we believe The Rock Academy would absolutely be in the best interest of the students, the community, and the LEA.

Furthermore, our robust community outreach underscores this benefit. The Rock Academy team, in addition to their combined 60 years’ experience serving at-risk youth, has spent the better part of two years designing The Rock and engaging with the community to hone our design and to understand demand. In that time, we’ve knocked on more than 1,000 doors. We’ve spent hundreds of hours in juvenile and truancy courts engaging with families and children and service providers. We’ve formed an advisory committee and held numerous focus groups. We’ve conducted nearly 100 home visits and spent hundreds of hours attending community events. We’ve collected nearly 600 surveys and spent hundreds of hours meeting with community leaders and organizations throughout Nashville. And the response has been resoundingly clear: Nashville needs The Rock Academy. With more than 85 letters of support from community agencies, just under fifteen power partners who have pledged to provide direct support to The Rock Academy, and enrollment interests are growing. We know that recruitment and enrollment will be different for The Rock Academy (as we outline in detail in our application), however, these data send a clear message: opening The Rock Academy would be in the best interest of Nashville.

We appreciate your consideration and look forward to the opportunity to engage in the appeal process.

With respect and gratitude,

The Rock Academy