



**DRAFT Executive Director's Findings and Recommendation**  
**Charter School Renewal Application for Libertas School of Memphis**

**November 5, 2024**

Pursuant to Tennessee Code Annotated ("T.C.A.") § 49-13-121, Commission Policy 3.600<sup>1</sup>, and charter renewal guidance issued by the Tennessee Public Charter School Commission ("Commission") and the Department of Education, the authorizer shall provide a school with the opportunity to make a clear and compelling case for renewal. As part of Commission Policy 3.600, following the public hearing and the review of the renewal application, the Executive Director of the Commission shall provide a final recommendation to the Commission. The Executive Director shall consider the report of the Renewal Review Committee, the site visit, and the public hearing in the final recommendation to the Commission.

Based on a review of the cumulative performance of the school, the additional information gathered by the Commission staff through the renewal process including a site visit and Review Committee Report, I believe that Libertas School of Memphis is on track to be renewed for a new, ten-year charter term.

**STANDARD OF REVIEW**

Pursuant to Commission Policy 3.600, the Commission staff completed an application review process. The Commission assembled a renewal 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 review committee members to ensure consistent standards and fair treatment of all applications.

The Commission's Charter Renewal Application Review Committee utilized the Commission's Charter Renewal Application Rubric<sup>2</sup>, which is used by the Commission when evaluating an application for renewal. In alignment with the State Board of Education's Quality Authorizing Standards in Policy 6.111, the authorizer "[e]stablishes and clearly communicates a renewal policy which requires the thorough analysis of a school's comprehensive body of objective evidence defined by the performance framework and is consistent with the charter agreement and state law, including any policy changes thereto." In addition, the Commission is required to hold a public hearing in the district where the charter school is located and conduct a renewal site visit in the school's tenth year of its charter agreement.

The Commission has the ability to approve the charter school's renewal application, with authorization to continue under the Commission for a new ten-year charter term or deny the application. If denied, the school would close at the end of the academic year.

**PROCEDURAL HISTORY**

1. Libertas School of Memphis ("Libertas") opened in the 2015-16 school year and was authorized by the Achievement School District. Libertas transitioned to the Commission in 2022 and serves 459 students in the 2024-25 school year.

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

<sup>2</sup> This rubric was updated in March 2024 by the Commission.

2. On December 27, 2023, the Commission provided the operator a cumulative performance report outlining the school's performance over the last ten years in alignment with the specified renewal criteria.
3. The school submitted a renewal application to the Commission on April 1, 2024.
4. The Commission's Review Committee independently analyzed and scored the Libertas application using the Commission's Charter Renewal Application Scoring Rubric.
5. On June 18, 2024, the Commission conducted a capacity interview with the applicant to address questions that arose from the review of the renewal application.
6. The Commission's Review Committee determined strengths and areas of question or concern of the Libertas renewal application, which served as the basis for the Review Committee Report attached hereto as **Exhibit A**.
7. On September 18, 2024, the Commission completed a full-day site visit to Libertas to interview stakeholders, discuss the Review Committee Report with school leadership, and observe classes.
8. Commission staff determined strengths and addressed challenges and concerns during the site visit to Libertas and outlined within the Renewal Site Visit Report attached hereto as **Exhibit B**.
9. The Executive Director of the Commission reviewed the record including the Review Committee Report and the Site Visit Report to write a preliminary recommendation for Libertas and outlined whether or not the school is on track to be renewed or nonrenewed. This report will be shared with Libertas on November 6, 2024.
10. On November 13, 2024, the Commission staff will hold a public hearing at Libertas in Memphis, Tennessee. At the public hearing, the Executive Director, sitting as the Commission's Designee, will hear the school address the preliminary Executive Director's recommendation and hear public comment.
11. After the public hearing, the Executive Director will determine a final consensus rating of the Libertas application and complete the final Executive Director's Recommendation Report.

**Commission's Review Committee's Evaluation of the Application**

Commission staff assembled a diverse review committee of internal and external experts to independently evaluate and score the Libertas renewal application. This review committee consisted of the following individuals:

<b>Name</b>	<b>Title</b>
Michelle Doane	External Reviewer
Rebecca Ledebuhr	Commission Staff
Maggie Lund	Commission Staff

The Review Committee conducted a review of the Libertas renewal application in alignment with the Commission's Renewal Application Scoring Rubric and held a capacity interview. The strengths and weaknesses of the renewal application are outlined in **Exhibit A**. The Review Committee also conducted a site visit to the school to evaluate the effectiveness of the school in alignment with the Commission's School Performance Framework, the renewal criteria, and the challenges and concerns outlined within the Review Committee Report. The full Site Visit Report is provided as **Exhibit B**. The following is a summary of the Review Committee Report and Site Visit Report:

Libertas School of Memphis was founded in 2015 to transform Brookmeade Elementary, a school that performed in the bottom 5% of schools in the state. Since the inception, significant strides have been made in



academic performance and operational stability. Libertas utilizes a Montessori instructional model that aligns with Tennessee Academic Standards, fostering a flexible learning environment with mixed-grade classrooms. This unique approach has led to academic success for Libertas's students, and the school has consistently outperformed its resident district, Memphis-Shelby County Schools ("MSCS"), particularly in English Language Arts ("ELA") and performance of subgroups, most notably students with disabilities. Additionally, Libertas has shown a strong trajectory of student growth, consistently achieving high scores on the Tennessee Value-Added Assessment System ("TVAAS") and making significant progress in reducing chronic absenteeism through intentional family engagement initiatives. Parents and families express high satisfaction with the school's inclusive culture, which is reinforced by the "attachment village" model that fosters strong communication and support networks for students. Libertas's commitment to supporting special populations of students is evident in the performance of economically disadvantaged students and students with disabilities. Internal assessment data demonstrates that students with disabilities often exhibit growth that exceeds that of their peers, highlighting the effectiveness of tailored support strategies. The school has consistently met or exceeded the performance standards set by both the Achievement School District ("ASD") and the Commission, receiving no notices of concern during its tenure. As part of its strategic expansion plan, Libertas was approved to open a middle school and expanded to include sixth grade in the 2024-25 school year. They will add a grade level each year until fully built out by the 2026-27 school year, all while maintaining alignment with the Montessori model and the required Tennessee state standards aligned middle school coursework.

Operationally, Libertas is characterized by strong leadership and effective governance. The experienced leadership team has maintained high teacher retention rates, averaging a 90% teacher retention rate year over year. This stability allows for the continuous development of staff and promotes a culture of collaboration and support. The review committee observed high-quality teaching practice in classrooms during the site visit with strong student engagement and a clear reflection of the professional development offered to staff. The governing board, comprised of members with diverse expertise and a long tenure, is actively engaged in strategic planning, ensuring the organization's vision remains consistent. While the tenure of the leadership team and governing board is commendable, it is important that the organization begin to develop a succession plan to ensure the vision and mission are carried out regardless of potential shifts in leadership over the next ten years of operations.

Financially, Libertas is in a sound position, evidenced by its history of balanced budgets and prudent financial management. The recent implementation of the state's new funding formula, TISA, has provided greater stability in per-pupil funding, which supports Libertas in serving its high population of students with disabilities. Furthermore, Libertas has successfully secured additional philanthropic support, enhancing its financial health while focusing on high-quality student services. The school's acquisition of its current facility, along with renovations to accommodate the new sixth-grade class, underscores its ability to secure the necessary financial resources to demonstrate its commitment to providing a conducive learning environment. The organization also acquired a new facility near the current campus that will house the middle school when fully built out, and they plan to begin renovations on the facility within the coming months. Operating with only 7% of its budget allocated to facilities, Libertas ensures that the majority of resources are directed toward instructional and student support services.

Looking ahead, Libertas has articulated clear and achievable goals that align with its academic, operational, and financial strategies. The school's commitment to staff development is reinforced through the Arete teacher training program, which cultivates a pipeline of qualified educators. As Libertas embarks on its middle school expansion, it is focused on creating a rigorous academic framework that supports student success through authentic assessments and individualized instruction. The middle school will continue to offer Montessori-style work cycles within the day to support core content instruction. Libertas remains committed to serving elementary students as they have done over the last nine years and has created a plan to support students as they matriculate from



elementary to middle school. Libertas is well-positioned for continued growth and success, ensuring a high-quality educational experience for all its students.

For additional information regarding the Review Committee's evaluation of the Libertas application, please see **Exhibit A** for the complete Review Committee Report, and for additional information regarding the renewal site visit and subsequent findings, please see **Exhibit B** for the complete Renewal Site Visit Report. Both reports are fully incorporated herein by reference.

### **Public Hearing**

Pursuant to Commission Policy 3.600, a public hearing chaired by the Executive Director will be held on November 13, 2024.

### **PRELIMINARY ANALYSIS**

Under T.C.A. § 49-13-121 and Commission Policy 3.600, the Commission is charged with determining if a charter school currently operating under the Commission will continue its authorization under the Commission for another ten-year charter term. In making my recommendation to the Commission, I will consider the Review Committee Report, the Renewal Site Visit Report, the discussion at the public hearing, and the public comments received by Commission staff.

Libertas School of Memphis was founded in 2015, when the organization acquired Brookmeade Elementary, a school that was performing in the bottom 5% of all schools in the state. While progress in school turnaround work is often not linear, Libertas School of Memphis has demonstrated success in improving student growth and achievement scores through its unique Montessori-style model. Libertas aims to be a community school, serving students in the Frayser community of Memphis, an area that has been historically underserved. The school is a high-quality option for families in the neighborhood and the community emphasis of the school is further evidenced by the fact that many faculty and staff live in the Frayser neighborhood and have children and grandchildren that attend the school. Libertas is a data-driven organization that leverages teacher observations through the Montessori-style work cycles and internal assessment data to track student progress at a granular level. Subgroup performance, particularly for students with disabilities, is strong at Libertas, and this is due to the high level of support received by students through the unique instructional model and data rich culture of the school. The school has demonstrated success in TVAAS with composite scores of Level 4s and 5s, and the school has consistently reduced chronic absenteeism since the 2019-20 school year. The school also met all renewal criteria within the cumulative performance report. The growth and proficiency seen in ELA at Libertas is commendable and outperforms the resident district, however math scores lag slightly behind the success seen in ELA. Through the review committee's questioning at the site visit and leadership's response to questioning, I am reassured by the Libertas team's response to math performance data and consistency in making appropriate shifts to ensure student academic success. Libertas has demonstrated a high likelihood of continued success through its consistent response to data and the needs of the community they serve. I am confident that they will continue this trajectory of academic success and will continue to provide robust support for students.

Operationally, Libertas is governed by a long-standing board with diverse experience. Additionally, the leadership team at Libertas has a long tenure, and many leaders have grown from within the organization. Despite state-wide staffing challenges, the school has demonstrated success, particularly due to the Arete teacher training program operated within the Libertas organization. This has created a pipeline of Montessori-certified teachers. At the site visit, the principal and Executive Director spoke about the priority of ensuring long-term sustainability for teachers and staff within the organization, and their success is evidenced by the roughly 90% teacher retention rate



year over year. Additionally, Libertas’s enrollment is strong. The school has consistently remained fully enrolled with a waitlist in recent years. The school has remained in compliance with district, state, and federal requirements and serves special populations of students very effectively. Considering all these strengths, I believe that Libertas will continue on a trajectory of operational success in future years.

Libertas, as an organization, has demonstrated foresight and strategic planning, particularly with the recent middle school expansion. The school filed an amendment to add a middle school in 2023, which was granted by the Commission. The intentional planning, response to the community, realistic financial projections, and facility decisions outlined within this amendment were commendable. It is clear that the organization is thoughtful about planning for the future and is fiscally responsible in its strategic decision making. The school acquired its current facility shortly after joining the Commission in 2022 and expanded to include space for the new sixth grade class. The organization also purchased a long-term facility to house the new middle school this year, and they will begin renovations on this property shortly. Despite the numerous recent facility acquisitions and renovations, through robust fundraising efforts and fiscal responsibility, the organization still devotes the majority of its per-pupil budget to student support and staffing. The organization is financially sound, and the leadership and governing board has demonstrated strong financial oversight.

Through my analysis of the totality of the evidence presented from the Review Committee’s in-depth review of the school’s performance over time, Libertas has demonstrated a commitment to the community and students it serves. With the implementation of this unique model, students are receiving high-quality instruction in a safe and supportive environment. The school has consistently gone above and beyond to serve special populations of students and is committed to ensuring positive outcomes for students. The operator has demonstrated the ability to strategically plan and respond to challenges as they arise. I have confidence that Libertas will continue a trajectory of success and continue to navigate challenges effectively.

### CONCLUSION

For these reasons, and for the reasons stated in the Review Committee Report attached hereto as **Exhibit A** and the Renewal Site Visit Report attached hereto as **Exhibit B**, I believe that the performance of the school is on track for renewal and a ten-year renewal term.

A handwritten signature in black ink that reads "Tess Stovall". The signature is written in a cursive style.

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Tess Stovall, Executive Director  
Tennessee Public Charter School Commission

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Date