



Executive Director’s Recommendation Libertas High School

Pursuant to Tennessee Code Annotated (“T.C.A.”) § 49-13-137, a sponsor that has at least one public charter school authorized by the Tennessee Public Charter School Commission (“Commission”) may apply for replication directly to the Commission. On January 31, 2026, the sponsor of Libertas High School applied for replication directly to the Commission.

Based on the review of the replication application and the components of the Commission’s review process, I believe that the Libertas High School initial replication application has met the standards for approval. Therefore, I recommend that the Commission approve the initial replication application for Libertas High School.

EXECUTIVE SUMMARY

School Name: Libertas High School

Sponsor: Libertas School

School Being Replicated: Libertas School of Memphis

Proposed Location of School: Frayser neighborhood of Memphis

Mission: “To continue and mature Libertas’ PK–8 Montessori program, preserving a core philosophy while adapting structures to meet adolescent developmental needs.”¹

Number of Schools Currently in Operation by Sponsor: The sponsor currently has one operating charter school authorized by the Commission.

Proposed Enrollment:²

Grade Level	Year 1: 2027-2028	Year 2: 2028-2029	Year 3: 2029-2030	Year 4: 2030-2031	Year 5: 2031-2032	At Capacity:
9	55	68	68	68	68	68
10	0	56	68	67	67	67

¹ Libertas High School Application, pg. 20

² Libertas High School Application, pg. 24

Grade Level	Year 1: 2027-2028	Year 2: 2028-2029	Year 3: 2029-2030	Year 4: 2030-2031	Year 5: 2031-2032	At Capacity:
11	0	0	51	61	60	60
12	0	0	0	46	55	55
Totals	55	124	187	242	250	250

Brief Description of the Application

The sponsor, Libertas School (“Libertas”), is proposing to open a charter school in Shelby County, Tennessee and serve students in ninth through twelfth grade when fully built out. The school, Libertas High School (“LHS”), is a new-start, replication school and would be the second school for the sponsor. The school intends to operate in the Frayser neighborhood of Shelby County to “preserve the core Montessori philosophy of educating the whole child while ensuring that adolescents graduate prepared to participate meaningfully in both higher education and the regional economy.”³ The school proposes to offer a Montessori high school experience and provide an opportunity for students in the Frayser neighborhood additional school options.

The proposed school will be governed by a diverse governing board with long-standing experience with Libertas School and holding various expertise in education, law, finance, and community engagement. In Year 0, LHS has budgeted \$3,350,000 inflow of funds, receiving \$1,600,000 in grants and start-up funds and \$1,800,000 in loan proceeds and projects \$3,053,661 in expenses for the school. LHS projects the school will have \$4,151,805 in revenue and \$4,081,745 in expenses in Year 1, resulting in a net operating income of \$70,060. By Year 5, the school projects to have \$3,442,867 in revenue and \$3,040,523 in expenses, resulting in a positive ending fund balance of \$1,516,105.⁴ The school anticipates that 80% of the student population will qualify as economically disadvantaged, 30% of the student population will be students with disabilities, and less than 1% of the student population will be English learners.⁵

STANDARD OF REVIEW

Pursuant to T.C.A. § 49-13-137 and Commission Policy 3.010, Commission staff and an independent charter application review committee conducted a substantive review of the LHS

³ Libertas High School Application, pg. 21

⁴ Libertas High School Application Budget

⁵ Libertas High School Application, pg. 25

application. The substantive application review consisted of the statutorily required elements, as set forth in T.C.A. § 49-13-107, including but not limited to an evaluation of the proposed charter school’s mission; educational focus, program, and academic plan; business plan, including an operating budget; governance board and structure; discipline code; and compliance with applicable laws and regulations. In accordance with the Tennessee State Board of Education’s Charter School Application Scoring Rubric (“rubric”), “[f]or an application to be deemed ready for approval, the summary rating for each of the major sections must meet the standard [(replication rationale and existing school history, educational program design and capacity, operations plan and capacity, budget and finance, and addenda, as applicable)].”⁶ In addition, the Commission holds a public hearing in the district where the proposed charter school seeks to locate.

Where applicable, if the Commission denies an initial application, the sponsor shall have thirty calendar days to submit an amended application to the Commission. The Commission’s decision on an amended application is final and not subject to appeal.⁷

The Commission’s charter application review process is based on three key stages of review:

1. **Evaluation of the Proposal:** The Review Committee independently reviewed the 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 four sections of the application: Replication Rationale and Existing School History, Educational Program Design and Capacity, Operations Plan and Capacity, and Budget and Finance. Each subsection was rated as Meets Standard, Partially Meets Standard, or Does Not Meet Standard through a consensus.
2. **Capacity Interview:** A ninety-minute interview was conducted with the sponsor and members of the governing board to address the concerns, weaknesses, and questions identified in the application, and to assess the capacity to execute the application’s overall plan.
3. **Public Hearing:** The Executive Director of the Commission presided over a public hearing. The sponsor presented its application, and the Executive Director asked the

⁶ Tennessee State Board of Education’s Charter School Application Scoring Rubric, pg. 3.

⁷ T.C.A. § 49-13-137(b)(4).

sponsor questions. A public comment period was held, and written public comments were accepted in the record.

The Commission utilized the rubric 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.”⁸

Executive Director Recommendation

State law requires the Commission to review and determine if the application “meets or exceeds the metrics outlined in the Tennessee State Board of Education’s application-scoring rubric.”⁹ Pursuant to T.C.A. § 49-13-137, 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. In making my recommendation to the Commission, I have considered the Review Committee’s Recommendation Report and all evidence gathered through the Commission’s process. 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 Libertas High School application did rise to the level of meeting or exceeding the standards required for approval.

I agree with the Review Committee’s assessment that the applicant’s replication rationale and existing school history meet the standard for approval. This conclusion is rooted in a clear justification for expansion into high school and the demonstrated academic success of the existing Libertas School of Memphis, which recently earned a Level 5 Tennessee Value-Added Assessment System (“TVAAS”) score. In the public hearing, Libertas shared that the move to a high school was fueled by urgency from current seventh grade students who desire a high-quality option within their own neighborhood. The applicant’s readiness is further signaled by

⁸ Tennessee State Board of Education Policy 6.111

⁹ T.C.A. § 49-13-108.

academic performance as indicated by consistent earning ratings of meets or exceeds standards on the Commission’s School Performance Framework. When asked in the public hearing how the application replicates the current focus, school leadership explained that Montessori principles translate into human-centered, hands-on learning for adolescents. This is reflected in the student enterprise model, which serves as a developmentally appropriate continuation of the lower school ethos.

I find that the applicant’s educational program design and capacity meet the standard due to an innovative design that incorporates significant community engagement. The high school model maintains and extends Montessori structures to meet graduation requirements through sustained work periods and a flexible block schedule. In the public hearing, the sponsor discussed an academic experience where students spend more than half their day on campus while accessing university settings for dual enrollment in their junior and senior years. To ensure implementation fidelity, the school will create a vivid graduate profile ahead of opening to clearly define what student success looks like. When questioned about monitoring performance and success, Libertas shared that they will use interim assessments and culture measures to track social-emotional growth, maintaining a culture that has resulted in zero expulsions over eleven years. In addition to the numerous letters of support from families, community members, and academic partners included in the application, strong community and family support was also demonstrated through the public hearing.¹⁰

I agree with the Review Committee that the applicant’s operations plan and capacity meet the standard, characterized by a realistic staffing plan and multiple feasible facility options. The staffing strategy is robust, featuring a founding team with prior high school experience and a director hired a year in advance. During the public hearing, when reflecting on the opening of the middle school, Libertas noted that they have increased operations personnel at every campus to remain proactive as they expand. Regarding facilities, the applicant has demonstrated the capacity to manage renovations and navigate site options to serve the Frayser community. When asked about leadership and board succession, the sponsor shared that they have utilized a leadership cohort to build capacity from within and have engaged consultants to update board member requirements to ensure long-term sustainability.

Lastly, I found that the budget and financial plan meet the standard, reflecting strong

¹⁰ The Commission received twelve public comments in support of Libertas High School. The Commission also accepted written comments, and the Commission received three written comments in support of Libertas High School.



financial stewardship and a conservative approach to expansion. The organization has a proven track record of clean audits and secured affordable facilities, which provides a high degree of confidence in the fiscal management. In the public hearing, Libertas presented a financial forecast that specifically supports student enterprise initiatives aimed at generating generational wealth for families. To mitigate risks, the applicant has secured partnerships and agreements that provide students with access to various pathways without over-relying on per-pupil funding. Furthermore, the leadership team emphasized during the capacity interview a conservative fiscal plan by assuming lower student persistence rates than their historical average, ensuring the organization can navigate potential enrollment fluctuations without compromising the academic model.

Any authorized public charter school is entrusted with the great responsibility of educating students and a significant amount of public funds. Additionally, an applicant seeking to replicate an academic model previously approved by the Commission will continue the success of the current school and provide high-quality education in line with the standards set forth in Tennessee law and rule for any next and/or expanding opportunity. For these reasons, the Commission will approve only those replicating schools that have demonstrated a high likelihood of success and meet or exceed the required criteria in all areas.

For the reasons expounded on in this report, I recommend that the Commission approve the Libertas High School replication application.

A handwritten signature in cursive script that reads "Tess Stovall". The signature is written in black ink and is positioned above a horizontal line.

Tess Stovall, Executive Director
Tennessee Public Charter School Commission

April 17, 2026

Date



EXHIBIT A:

Charter Application Review Committee Recommendation Report

Following the submission of the LHS application to the Commission, Commission staff assembled a diverse review committee of internal and external experts to independently evaluate and score the LHS application. This Review Committee consisted of the following individuals:

Name	Title
Sophie Binenfeld Gilmore	Commission Staff
Erin Conley	External Consultant
Beth Figueroa	Commission Staff
Neven Holland	External Consultant
Whitney Noel	External Consultant

The Commission's Review Committee conducted a substantive review, a capacity interview with the sponsor and an evaluation and scoring of the application resulting in a consensus rating for each major section. The committee's consensus rating of the LHS application was as follows:

Sections	Ratings
Replication Rationale and Existing School History	Meets Standard
Educational Program Design and Capacity	Meets Standard
Operations Plan and Capacity	Meets Standard
Budget and Finance	Meets Standard

The Review Committee recommends the approval of the initial application for LHS based on a demonstrated history of high academic achievement and a robust replication strategy that successfully adapts the Montessori model for adolescents and has demonstrated community support and demand. Operationally, the organization has shown strong capacity to pivot and scale, utilizing an existing internal teacher accreditation program and proactive facility planning to ensure readiness well before opening. Financially, the applicant possesses a proven track record of stewardship, evidenced by clean audits and a conservative budget that minimizes reliance on per-pupil funding through secured philanthropic support and realistic TISA ("Tennessee Investment in Student Achievement") projections.

Analysis of the Replication Rationale and Existing School History

Rating: Meets Standard

Strengths Identified by the Commission

The applicant's Replication Rationale and Existing School History meets the standard because of its clear replication rationale, the demonstrated ability of its readiness to open a new campus and grade band, and the strong academic success of the existing Libertas School of Memphis.

Leadership thoroughly explained the transition of Montessori principles from elementary to the newly designed high school during the application process and capacity interview. The application states the high school will continue to use Montessori methods in a developmentally responsive manner while including key components of Montessori design such as multi-age interdisciplinary work cycles, and incorporation of student enterprises. During the capacity interview, leadership described its commitment to fostering independence at the high school level as being a key element of the Montessori model in developmentally appropriate ways, such as allowing for students to participate in dual enrollment opportunities and technical pathways. The Review Committee found the intentional design of the Montessori model adapted at the high school level to be an innovative continuation of Libertas's current program.

Libertas School of Memphis demonstrated a long history of success at the elementary level, and has shown strength at the middle school level, now in its second year of operation. Libertas has consistently shown strong growth as demonstrated by its Level 5 TVAAS score in 2025 and in five of the last six years. They have also displayed high achievement as demonstrated by exceeding Memphis-Shelby County Schools in the 2025 Tennessee Comprehensive Assessment Program ("TCAP") state test by over ten points in English language arts and math. Libertas has also consistently met or exceeded standards on the Commission's School Performance Framework and was awarded a ten-year charter renewal in 2025. Additionally, Libertas's special education population outperformed the state of Tennessee in TCAP achievement in the 2025 TCAP state test. These results show the success of Libertas students in both growth and absolute achievement throughout the school's history. This success also led to the renewal of a ten-year charter term by the Commission in 2025. While the middle school is in only its second year of operation, early growth and achievement data indicate that Libertas is demonstrating similarly strong results as Northwest Evaluation Association Measures of Academic Progress testing showed sixth grade students growing in the ninety-third percentile for math in 2025.

During the application process, Libertas's leadership gave realistic, honest reflections of its opening of a new campus and expansion into middle school during the last few years. During



the capacity interview, the director of operations spoke to the adjustments that the organization has made as a result of having two different campuses beginning the 2025-26 school year. Libertas hired a new operations manager specifically for the middle school campus due to the extra burden on the operations staff due to the move. This reflection demonstrated the operator's ability to pivot when necessary to ensure the school is run effectively and efficiently. Additionally, this reflection was utilized in creating the staffing plan for the high school, which has its own operations manager at-scale. The Review Committee appreciated leadership's ability to reflect and use these challenges to create a robust plan for LHS.

Analysis of the Educational Program Design and Capacity

Rating: Meets Standard

Strengths Identified by the Commission

The applicant's Educational Program Design and Capacity meets the standard due to its innovative and thoughtful program design, strong community engagement, and demonstrated community demand that informed the development of a curriculum aligned to students' needs.

The application explains thoughtful developmental adjustments to the academic model for adolescents, including the integration of student enterprises and project-based learning tied to real-world economic participation. The high school academic program extends the existing Montessori instructional model while adapting structures to meet high school graduation requirements and end-of-course assessments. The instructional plan extends the Montessori model into high school through sustained work periods, project-based learning, and a flexible block schedule to support off-campus experiences to foster independence for students. These structures are paired with high quality instructional materials, and a strong career readiness focus that provides students with access to early postsecondary opportunities and aligned postsecondary pathways. LHS has already created partnerships with local institutions such as the University of Memphis for dual enrollment opportunities, which will begin in the eleventh grade. LHS leadership also shared in the capacity interview that LHS teachers will host office hours for students enrolled in dual enrollment courses, ensuring students are successful in college-level coursework.

The plan for Libertas High School was created with the help of thoughtful community support and engagement at multiple intervals. Leadership conducted surveys, a High School Vision Night, and focus groups to develop an academic plan that is aligned with what the community hoped to have in their ideal continuation of the Libertas experience. Libertas community members expressed a desire for hands-on learning and real-world preparation for its future high schoolers. This informed decisions such as the small size of the high school and inclusion of postsecondary partnerships and hands-on career opportunities. The application proposes for cohorts of students to lead the process of renovating and ultimately selling a blighted lot in Frayser, in which students conduct a multi-year project, earning real-world experience while doing so. During the capacity interview, leaders stated they have researched high-performing high schools throughout the country conducting similar projects and are working through plans to ensure the process will run smoothly at Libertas. Leadership acknowledged there are still details to be worked out, such as the purchase of such properties, but affirmed the commitment first and foremost to providing a strong continuation of a Montessori education for its high school students.



The application also included conservative estimates for matriculation assumptions given that the current school has a strong history of student retention. Matriculation rates can be a concern for a new school especially in its founding years, so LHS assumed an 80% matriculation rate for its middle school into the high school in its budget assumptions. This assumption is conservative, given the historical persistence rate of Libertas students is around 87%. Additionally, the letters of support provided in the application materials from current families looking to attend LHS show concrete evidence that Libertas families will enroll in LHS.

Analysis of the Operations Plan and Capacity

Rating: Meets Standard

Strengths Identified by the Commission

The applicant's Operations Plan and Capacity meets the standard because of its thoughtful, realistic staffing plan, multiple feasible facility options, and longstanding governance.

The staffing plan for LHS begins in the incubation year for the high school, in which the principal and two teachers will work at the current middle school to get to know existing students and acclimate to the Libertas culture. This plan will ensure that students and staff have existing relationships when beginning the first ninth-grade cohort, as well as work towards a cohesive curriculum across grade spans. The sponsor's current school, Libertas School of Memphis, operates its own Montessori educator prep program, currently focused on the elementary and middle grades. While the program is not expected to expand to the high school level in the near term, it has strengthened the organization's ability to recruit and retain highly qualified educators. Montessori accredited teachers have successfully advanced to middle grade levels, directly benefiting students during the school's expansion. Libertas' strong reputation as a workplace has also attracted high-performing teachers across Memphis who have heard of the Libertas brand. Libertas also has existing partnerships with teacher preparation programs such as Memphis Teacher Residency and Teach for America that they plan to utilize to staff high school positions. While there is a national teacher shortage and schools often struggle to staff new schools, LHS will benefit from its strong program and existing reputation when staffing the high school.

LHS has various options and plans for facilities, which are all feasible and have strong chances of success. One such option would be to expand the current middle school campus, which recently finished construction. This option would allow for shared resources across the middle and high school, as well as restrict operation to only two campuses. Other options include a space near the current campus that would require renovation and transformation into a school layout. Another option would be to purchase a property from Memphis-Shelby County Schools, which would also require maintenance to run the school at capacity. Libertas has shown the capacity to implement expansion due to its recent launching of the middle school campus. Regardless of the options laid out by LHS, the Review Committee is confident in the operator's ability and capacity to carry out the necessary renovations while preparing for the new high school.

Libertas's board composition is diverse and grounded in the community. Many board members have ties to the Frayser community and have a diverse range of backgrounds and expertise to help support the school. The board has taken proactive steps ahead of replication,



such as identifying a new chair, recruiting additional members, and forming a high school advisory group. This work demonstrates that the board is proactively preparing to effectively govern a high school.

Analysis of the Budget and Finance

Rating: Meets Standard

Strengths Identified by the Commission

The applicant's Budget and Finance meets the standard because the application and capacity interview demonstrated a history of strong financial stewardship, a high level of fiscal expertise, and a conservative approach to budgeting for the new high school that sufficiently covered the academic priorities and plan. The Review Committee also found that the applicant possesses a proven track record of maintaining a robust financial position at its existing pre-K-8 school, providing a high degree of confidence in the governing body's ability to manage the financial complexities and the expansion to a pre-K-12 model.

LHS demonstrated a strong financial position through its history of clean independent audits and the maintenance of a healthy fund balance at its existing school, Libertas School of Memphis. This historical performance serves as a primary indicator of the organization's capacity to oversee public funds and manage the financial growth associated with the high school replication. Within the application and during the capacity interview, the leadership team and board members reinforced this by speaking of the board's role in monthly financial monitoring, ensuring that the high school would be adequately supported while maintaining transparent accounting practices.

The five-year budget is grounded in conservative and realistic assumptions. The applicant utilized a conservative TISA revenue projection and factored in all necessary expenditures for the model. In the capacity interview, the applicant clarified that the budgeting process utilizes conservative enrollment modeling, specifically assuming a lower student persistence rate than their historical average, to provide a necessary fiscal cushion. The budget effectively reflects a viable break-even point, supported by an incubation and staffing strategy that ensures leadership is in place well before opening while allowing for elective or non-instructional positions to be scaled in alignment with actual student matriculation and enrollment. This fiscal readiness was further evidenced by the applicant's clear explanation in the application and interview regarding the transparent allocation of shared central office services as the organization expands to a pre-K-12 model.

Furthermore, the applicant presented robust contingency planning. The application and capacity interview articulated clear scenarios to mitigate potential financial risks, such as lower than projected enrollment. These contingencies include the ability to adjust the timing of non-instructional hires and the flexibility to utilize existing organizational reserves without compromising the integrity of the academic program or student safety. The Review Committee noted that the applicant has already secured significant start-up funding through grants and



philanthropic support, decreasing reliance on per-pupil funding during the critical first years of operation. Throughout the application process, LHS demonstrated a sophisticated understanding of the TISA funding formula and the specific financial requirements necessary to sustain the proposed model.



Evaluation Team

Sophie Binenfeld Gilmore is the Authorizing Coordinator for the Tennessee Public Charter School Commission. She previously worked as the Student Data Analyst for the Commission. Prior to working at the Tennessee Public Charter School Commission, Sophie taught elementary school at a high performing charter school in the South Bronx. More recently, Sophie completed her Master of Public Policy from Vanderbilt University where she worked as a research assistant for the Fuchs Group. Sophie also holds a Bachelor of the Arts degree from Bowdoin College and a Master of Teaching from Relay Graduate School of Education.

Erin Conley serves as an expert reviewer for a number of charter school authorizers across the country. Over the last fourteen years in the field of education, she has served in roles focused on survey development, data analytics and visualization, research, board development, compliance, school operations, and policy analysis. Erin has expertise in charter authorization and laws that impact charters and networks. Erin began her career teaching in the Chicago Public School district. She has a Bachelor of Arts in English and Secondary Education from Michigan State University and a master's in public policy from Vanderbilt University with a focus on K-12 education policy.

Beth Figueroa is the Director of Authorizing for the Tennessee Public Charter School Commission. She is a Certified Public Accountant and has spent the last 15 years specializing in school finance and charter school oversight. Before working at the Commission, Beth worked as an administrator and charter school authorizer in California. She has also had the opportunity to serve as the Chief Business Officer of a charter school, an Executive Director of Fiscal Services for a school district with an annual budget of over \$500 Million, and an auditor of charter schools and non-profit organizations. She earned her Master of Business Administration degree from California Baptist University, where she also received her B.S. in Business Administration.

Neven Holland is an educator and Ph.D. student in education at the UCLA School of Education and Information Studies. He began his career as a resident teacher with the Memphis Teacher Residency, serving at Aspire Hanley Elementary—a charter school in the Achievement School District. He went on to spend nearly a decade as a fourth-grade teacher at Treadwell Elementary with Memphis-Shelby County Schools. In addition to his doctoral studies, Neven serves as a graduate student researcher on a school leadership project focused on preparing leaders to build more effective schools for students and communities. He is also a mathematics content reviewer for EdReports, where he critiques and evaluates instructional materials. As a freelance writer, Neven also contributes to Edutopia and has had his work featured in Education Week, where he writes about K-12 educational issues. His dedication to teaching was recognized nationally by the White House and the National Science Foundation when he was selected as a



2022 Presidential Awardee for Excellence in Mathematics and Science Teaching for Tennessee.

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.