



August 2, 2024  
Tess Stoval, Executive Director  
Tennessee Public Charter School Commission  
500 James Robertson Parkway  
5th Floor, Davy Crockett Tower  
Nashville, TN 37243

Dear Executive Director Stovall, Tennessee Public Charter School Commission, and Review Committee,

Please consider this letter as Encompass Community School's official appeal of the denial of our new start charter application on July 23, 2024, by the Metropolitan Nashville Public Schools Board of Education.

Encompass Community School is a proposed single-site, K-8 public charter school with primary enrollment focused in the Pearl-Cohn and Whites Creek clusters in Nashville. Encompass Community School leverages a mastery-based, student-centric approach to ensure all students thrive academically and personally. We believe Encompass's application meets or exceeds the metrics outlined in the TN Department of Education's application scoring rubric and that approval of the amended charter application is in the best interests of the students, the local educational agency ("LEA"), and the community. We appreciate your team's careful consideration of this appeal.

We respectfully submit our appeal based on the following:

**(1) Our application met or exceeded the metrics outlined in the TN Department of Education's application scoring rubric:**

While the MNPS review committee assigned our amended application ratings of Meets/Exceeds Standard in Academic Plan and Capacity and Partially Meets Standard in the Operations and Financial Capacity sections, we believe that Encompass's amended application has met or exceeded the standard of the department's scoring rubric in all sections.

As examples:

- a. The review committee and the board repeatedly cited concerns about Encompass's projected enrollment in North Nashville, citing declining enrollment at district schools in Encompass's target geography. However, our application provided diverse and robust state and local data demonstrating that the school-aged population density in that region is strong and growing. We also shared data from MNPS that showed our target geography has much higher than typical out of zone enrollment. Those data patterns, combined with hundreds of hours of community engagement and research and perpetually low outcomes data in zoned schools - suggest that families leaving zoned schools in search of better options are a leading contributing factor to decreasing enrollment. At the time of

our application, Encompass had more intent to enroll forms than seats available (and those numbers have continued to grow), a robust recruitment team and enrollment strategy, and scores of data suggesting strong community engagement and support. All of which meet the requirements outlined in the department's scoring rubric.

- b. In our initial application review, MNPS cited our projected inflation rate as insufficient and recommended a 2.0-3.5% rate. We adjusted our amended application as suggested to reflect 2.0% inflation. In our amended application findings, MNPS cited a concern with our revised inflation rate of 2.0% and stated 2.5% as a minimum. Additionally, many of the findings in the review committee's report go beyond the characteristics of a strong response as outlined in the approved TDOE Scoring Rubric. While we appreciate relevant additional feedback, the final ratings of Meets or Exceeds Standard should be reflective of the characteristics of a strong response as defined by the department and should exclude findings or concerns outside of that.
- c. In addition to the findings outside the scope of the scoring rubric, the report included, unfortunately, inaccurate findings. For example:
  - i. Citing the absence of documents included in our submission, such as an acceptable use policy in the student handbook;
  - ii. The assertion that cluster data was not considered in setting of academic goals; and
  - iii. The assertion that, "timelines and locations had not been identified and there were still no contingency plans for facility issues."

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

Encompass Community School's target enrollment is in the Whites Creek and Pearl-Cohn Clusters. These two regions have been chronically underserved and underestimated. Academic achievement in these clusters, as measured by TCAP Success Rates, is significantly and persistently below district and state averages. While 2023-2024 TCAP data illustrate MNPS is making annual growth across grade levels and student groups, these data also illustrate a sustained and prolific achievement gap - and this inequity is ever present in our target community. In some cases, the Success Rate in our proposed communities does not exceed 5% and, therefore, is not reportable under TDOE suppression guidelines.<sup>1</sup> As examples, at Cockrill Elementary and John Early Middle School, the percentage of students who met or exceeded expectations is less than 5% in both ELA and Math. At Robert Churchwell, the success rate in Math is less than 5%. 100% of zoned district elementary, middle and high schools in the Pearl-Cohn cluster have received the federal designation of Comprehensive Support and Improvement Schools.<sup>2</sup> Out of the three zoned elementary schools and one middle school in the Whites Creek cluster, only one school exceeds a 14% success rate on the 2023-2024 TCAP in ELA or Math. These trends have long existed within the Whites Creek and Pearl-Cohn Clusters.

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<sup>1</sup> Suppression Data Guide: <https://www.tn.gov/content/dam/tn/education/rpt-crd/SuppressionRules201819.pdf>

<sup>2</sup> Tennessee Department of Education. 2023 Federal Accountability Measures. <https://www.tn.gov/education/districts/lea-operations/accountability/2023-federal-accountability.html>



As a result, families and community members within the Whites Creek and Pearl-Cohn Cluster are searching for effective schools outside of their zoned options. As detailed in our application, 2023-2024 MNPS Zoned Enrollment<sup>3</sup> illustrates an average of 53.04% of students in our target communities opting out of their zoned school in search of better options. In some cases, this amount is even higher (e.g., Alex Green Elementary at 60.40% and Moses McKissack Middle School at 67.50%). This is nearly triple the value compared to regions of MNPS with historically high-performing schools. Encompass's extensive community engagement work adds a qualitative narrative to this data. To date, we've received input from 415 parents and community members residing in our proposed community, of which 94% support the opening of Encompass, and the remaining 6% seek to learn more. In our conversations with community members, we heard - time and again - a desire for better options for students *inside* their community.

Our proposed academic model answers this call - by interrupting persistent low academic performance as outlined above. The robust research backing our mastery-based model and the use of the Morningside Model of Generative Instruction has repeatedly led to life-changing outcomes for students. Peer-reviewed and evidence-based research demonstrates that, on average, students enrolled at Morningside grow an average of two and a half years in reading, four grade levels in language arts, and three grade levels in math.<sup>4</sup> Our team was able to mimic similar academic growth during a pilot in the 2022-2023 school year here in Nashville, as further outlined in our application. Our model aligns fully with the priorities of MNPS, specifically, Literacy Reimagined, Focused Outcomes, Community Support Hubs, and the Equity Roadmap. Furthermore, in alignment with Tenn. Code Ann. § 49-13-102(a), the design of Encompass has been proven to eliminate achievement gaps between low and high performers.

Taken together, opening an evidence-based, aligned, and high-quality school option that considers the specific needs and desires of the target community is in the best interest of the students, the community, and the LEA.

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

With respect and gratitude,

Encompass Community School

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<sup>3</sup> Metro Nashville Public Schools November 2023-2024 Zoned School Data Report, All Quadrants

<sup>4</sup> Results from an 11 year study analyzing Morningside Academy's achievement gains.

<https://www.aubreydaniels.com/media-center/organizational-solutions/articles/morningside-academy-building-foundations-for-student>