

# **Executive Director's Recommendation**

# **Encompass Community School 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 1, 2024, the sponsor of Encompass Community School ("Encompass" or "sponsor") appealed the denial of its amended application by the Metro Nashville Public Schools ("MNPS") 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 Encompass amended application was contrary to the best interests of the students, local education agency ("LEA"), or community.<sup>1</sup> Therefore, I recommend that the Commission overturn the decision of MNPS Board of Education to deny the amended application for Encompass.

# **STANDARD OF REVIEW**

Pursuant to T.C.A. § 49-13-108 and Commission Policy 2.000, Commission staff and an independent review charter application review committee conducted a de novo, on the record review of Encompass's amended application. In accordance with the Tennessee Department of Education's charter application scoring criteria, "[f]or an application to be deemed eligible for approval, the summary ratings for all applicable categories [(academic plan and design, operations plan and capacity, financial plan and capacity, and portfolio review and performance record)] must be 'Meets or Exceeds the Standard'."<sup>2</sup> In addition, the Commission is required to hold a public hearing in the district where the proposed charter school seeks to locate.<sup>3</sup>

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 the best interests of the students, local education agency, or community.<sup>4</sup> If the local board of education's decision is overturned, then the Commission can approve the application, and thereby authorize the school, or to affirm the local board's decision to deny.

# **PROCEDURAL HISTORY**

- 1. On December 4, 2023, the sponsor submitted a letter of intent to Metro Nashville Public Schools expressing its intention to file a charter school application.
- 2. The sponsor submitted its initial application for Encompass Community School to MNPS on February 1, 2024.
- 3. MNPS assembled a review committee to review and score the Encompass initial application.
- 4. On March 21, 2024, MNPS's Review Committee conducted a capacity interview with representatives of Encompass.

- <sup>3</sup> T.C.A. § 49-13-108.
- <sup>4</sup> Id.

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<sup>&</sup>lt;sup>1</sup> T.C.A. § 49-13-108.

<sup>&</sup>lt;sup>2</sup> Tennessee Department of Education's Application to Create a Public Charter School Scoring Criteria, pg. 2.



- 5. MNPS's Review Committee reviewed and scored the Encompass initial application, indicating the academic, operations, and finance sections partially met standards.
- 6. On April 23, 2024, MNPS Board of Education voted to deny the Encompass initial application.
- 7. The sponsor amended and resubmitted its application for Encompass to MNPS on May 24, 2024.
- 8. MNPS's Review Committee reviewed and scored the Encompass amended application based on the charter application scoring rubric and rated the academic section as meets or exceeds standard and the operations and finance sections as partially meets standard.
- 9. On July 23, 2024, the MNPS Board of Education voted to deny the amended application of Encompass.
- 10. The sponsor appealed the denial of the Encompass amended application in writing to the Commission on August 1, 2024, including submission of all required documents per Commission Policy 2.000.
- 11. The Commission's Review Committee independently analyzed and scored the Encompass amended application using the Tennessee Department of Education's charter school application scoring rubric.
- 12. On September 16, 2024, the Commission staff held a public hearing at Davy Crockett Tower in Nashville, Tennessee. At the public hearing, the Executive Director, sitting as the Commission's designee, heard presentations from the sponsor and MNPS and took public comment regarding the Encompass amended application.
- 13. The Commission's Review Committee conducted a capacity interview with key members of the Encompass leadership team on September 20, 2024 via Microsoft Teams.
- 14. After the capacity interview, the Commission's Review Committee determined a final consensus rating of the Encompass amended application, which served as the basis for the Review Committee Recommendation Report, attached hereto as **Exhibit A**.
- 15. The Commission staff conducted a full review of the record which includes the initial and amended applications submitted by the sponsor, documentation submitted by MNPS, 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 MNPS to review and score the Encompass initial application consisted of the following individuals:



Name	Title		
Tieawasa Hodak	Director of Exceptional Education		
Casey Minshall	Coordinator of English Learners		
Robert Wallace	Executive Office of Resource Strategy		
Ken Stark	Executive Director of Operations		
David Williams	Executive Officer of Teaching and Learning		
Sudhir Sinha	Data Coach of Research Assessment and Evaluation		
Ryan Latimer	Director of Boundary and Planning		
Casey Megow	Director of Facilities and Planning and Construction		
Cordarrell Cobb	Partner School Budget Strategy		
Gay Burden	External Consultant		

The Encompass initial application received the following ratings from the MNPS Review Committee:

Sections	Ratings	
Academic Plan and Design	Partially Meets Standard	
Operations Plan and Capacity	Partially Meets Standard	
Financial Plan and Capacity	Partially Meets Standard	

After the MNPS Review Committee completed its review and scoring of the initial application, its analysis was presented to the MNPS Board of Education on April 23, 2024. The MNPS Board of Education voted to deny the initial application of Encompass.

# **District Denial of Amended Application**

The Review Committee assembled by MNPS to review and score the Encompass amended application consisted of the following individuals:

Name	Title		
Tieawasa Hodak	Director of Exceptional Education		
Casey Minshall	Coordinator of English Learners		
Robert Wallace	Executive Office of Resource Strategy		
Ken Stark	Executive Director of Operations		
Sudhir Sinha	Data Coach of Research Assessment and Evaluation		
Ryan Latimer	Director of Boundary and Planning		
Casey Megow	Director of Facilities and Planning and Construction		
Cordarrell Cobb	Partner School Budget Strategy		
Gay Burden	External Consultant		

Upon resubmission, the MNPS Review Committee conducted a review of the amended application, and the amended application received the following ratings from the MNPS Review Committee:

Sections	Ratings	
Academic Plan and Design	Meets or Exceeds Standard	
Operations Plan and Capacity	Partially Meets Standard	
Financial Plan and Capacity	Partially Meets Standard	

After the MNPS Review Committee completed its review and scoring of the amended application, its analysis



was presented to the MNPS Board of Education on July 23, 2024. At the July 23, 2024 board meeting, the MNPS Board of Education voted to deny the amended application of Encompass.

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

Following the denial of the Encompass 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 Encompass amended application. This Review Committee consisted of the following individuals:

Name	Title		
Kristine Barker	External Reviewer		
Trent Carlson	Commission Staff		
Melanie Harrell	Commission Staff		
Grant Monda	External Reviewer		
Rebecca Ledebuhr	Commission Staff		

The Commission's Review Committee conducted an initial review and scoring of the Encompass 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 Encompass application was as follows:

Sections	Ratings
Academic Plan and Design	Meets or Exceeds Standard
Operations Plan and Capacity	Meets or Exceeds Standard
Financial Plan and Capacity	Meets or Exceeds Standard

The Review Committee recommends the approval of the amended application for Encompass Community School because the applicant proposes to bring an innovative academic model to a community with limited highquality, public options, has assembled a strong founding governing board, has a viable facility plan, and has secured start-up funding and philanthropy dollars to support a successful school opening.

The academic plan presented by the applicant meets or exceeds standard because the application provides a robust community engagement plan that includes community feedback, presents a compelling, research-based, and evidence-backed model, and the academic model can be adapted and tailored to meet the needs of special populations of students. The Review Committee noted a particular strength in the applicant's community engagement efforts, which have led the applicant to design a school model that fits the needs and desires of the target communities and resulted in a significant number of interest-to-enroll forms from eligible families. Additionally, the application includes research and evidence supporting the success of the proposed academic model, which would be innovative for the area. The Review Committee also found the academic model to be tailored to meet the needs of students with disabilities and English learner ("EL") students, and the proposed school leaders and board members demonstrated experience and capacity to execute the model with fidelity.

The applicant's operations plan meets or exceeds standard because the founding board members have a diverse array of expertise to support and oversee the school, there is a realistic, viable facility plan, and the application includes a robust professional development plan to support teachers within the academic model. The Review Committee found the processes set in place for governance and oversight of the proposed school to be well-developed and board members who participated in the capacity interview demonstrated a clear understanding of their individual roles and responsibilities in supporting the school. Through the capacity interview, the Review



Committee also garnered updates regarding the applicant's facility plan, which includes a letter of intent submitted to a desired facility, as well as realistic, viable contingency plans. The Review Committee also noted the applicant's professional development plan to be a particular strength and positions the school to effectively support and train teachers within the academic model.

The financial plan meets or exceeds standard because the applicant has secured grants and philanthropy dollars to support start-up costs, uses conservative and reasonable estimates in its budgeting, and demonstrates financial capacity with its board and back-office provider. Through the application and capacity interview, the Review Committee found that the applicant has secured a substantial amount of start-up funding, including exceeding their fundraising goals, which will allow the school to start in a strong financial position.

For the aforementioned reasons, the Review Committee found that the sponsor did 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 Encompass amended application, please see **Exhibit A** for the complete Review Committee Recommendation Report, which is fully incorporated herein by reference.

# **Public Hearing**

Pursuant to statute<sup>5</sup> and Commission Policy 2.000, a public hearing chaired by the Executive Director was held on September 16, 2024. Representatives from MNPS at the public hearing focused on the process used by the MNPS Review Committee to evaluate Encompass Community School's application. Representatives from MNPS indicated that the Encompass amended application was denied based on the operations and financial plans partially meeting standards. The district's representative first explained why the MNPS Review Committee found the academic plan to meet or exceed the standard outlined in the rubric. The Committee cited that the application included intentional parent feedback, vetted and aligned curricula, and a corrective action plan, each of which were items Encompass amended based on the district's initial review and feedback. The district continued explaining that the operations plan was found to partially meet standard due to the applicant not adequately addressing challenges with the target location being in a changing area of the city, enrollment targets, the start-up timeline, and the applicant not disclosing the facility location. The district then spoke about the financial plan and how it was found to partially meet standard, stating that the applicant planned to outsource many financial responsibilities that could lead to ineffective oversight, and that the cost assumptions included in the budget were not realistic. Lastly, the district's presentation emphasized concerns with the proposed school's target location, stating the area has historically been under-enrolled and the district previously consolidated schools in that area due to enrollment. The district shared that the zoned schools in the Whites Creek and Pearl Cohn clusters, identified in the application as the school's target communities, have current utilization rates of 59.1% and 47.2%, respectively, demonstrating that the schools are using roughly half of the available seats. Additionally, enrollment trends in both clusters are declining, and there are plenty of opportunities for students to enroll at existing schools.

In the sponsor's opening statement, the proposed founding school leader began by sharing information about the academic model, stating that the mastery-based model combines several evidence-based methods into a single, cohesive program. According to the sponsor, the Morningside Model of Generative Instruction, which the model is based upon, has evidence demonstrating students can grow 2.5-4 years in a single academic year. The sponsor then spoke about the targeted area for the school, stating that the historically low academic data in the area is why they are proposing to bring the model there. The sponsor continued by outlining the community engagement efforts

<sup>&</sup>lt;sup>5</sup> T.C.A. § 49-13-108(5)(b)(i).



undertaken as part of the application process, including evidence that demonstrates the Whites Creek and Pearl Cohn clusters have some of the highest opt-out rates from zoned schools in the city. According to the sponsor, there is a growing population of school-aged children in the area. However, the majority of families are opting out of their zoned schools in search of other options. The sponsor shared updated enrollment numbers, stating that at the time of the public hearing, 675 families had expressed interest in enrolling, 274 of whom would be eligible for enrollment in the 2025-26 school year, and an additional 112 of whom would be eligible in the 2026-27 school year. The sponsor concluded the presentation by sharing evidence from a pilot program that was conducted by the proposed school leader and providing evidence of the proposed board's expertise and ties to the community.

During questioning, the Executive Director of the Commission began by asking how the district's Review Committee came to the determination that the proposed academic plan met or exceeded standards. The district representative reiterated the points made in the opening presentation and added that, despite being found to meet or exceed standards by the Review Committee, the MNPS Board still cited some additional concerns with the academic plan, namely enrollment and academic goals, in their denial of the amended application. The Executive Director then shifted to garner more information regarding the declining enrollment in the proposed clusters. The district representative stated that the district's boundary and planning team provided historical enrollment data for the past ten years from both clusters. This data showed that the number of K-12 students who live in the clusters, regardless of what school they attend, is fewer than it was ten years ago. The Executive Director then asked what the district would need to see in a facility plan to determine it met the standard set forth in the rubric, as disclosing a property location is not a requirement of the rubric yet was cited as a reason for denial. The district representative stated that the district acknowledges that an exact facility location is not required but stated that the applicant's plan to co-locate until a permanent facility is ready brought forth concerns regarding renovations, storm shelter requirements, and the impacts this could have on the proposed budget. The district representative clarified that the Review Committee reviewed the facility plan that was included in the amended application and needed more specifics to determine if the proposed budget was adequate. Questioning then shifted to the district's concerns regarding the pre-opening and start-up plans, and the district representative stated the application lacked a realistic timeline as the timelines provided were broad, did not contain end dates, and the window for furniture and material procurement was unrealistic. Lastly, the Executive Director asked why reliance on a back-office provider was noted as a concern, as it is a common practice amongst charter schools. The district representative stated that the Review Committee found there was a lack of healthy balance between external support and internal control for financial management within the application.

The Commission's Executive Director then questioned the sponsor, beginning with questions as to why the Whites Creek and Pearl Cohn clusters were targeted, considering the population shifts and school consolidations that were acknowledged in the application and expanded upon by the district. The sponsor stated that census data shows a stable, growing population data in the area and opt-out rates from zoned schools show a conflicting narrative than what the district is saying. The sponsor stated their outreach to families in the area is ongoing and reiterated their current interest-to-enroll numbers exceed the minimum enrollment the school would need to operate the proposed model. The Executive Director then asked questions regarding the facility plan, seeking to garner any updates the sponsor has made towards acquiring a facility. The sponsor outlined two potential facilities, both of which have the capacity for the school for up to three years. The sponsor stated that a formal letter of intent ("LOI") was submitted to the priority facility, and they are hopeful to move forward on that facility upon authorization. According to the sponsor, an architect, with whom they have contracted, has estimated that facility renovations are expected to be less than \$100,000. The Executive Director then asked questions regarding the staffing plan and how the proposed model will provide time for direct services to students who qualify. The sponsor clarified that the primary



responsibility of instructional assistants, outlined in the staffing model, will be to support students who are at or above grade level during personalized learning time, and these staff will only be used for specific interventions should the number of students needing intervention exceed what the school plans for. The sponsor also clarified that the two-teacher model is not an active, co-teaching model, but rather there are two teachers in the room simultaneously with two small groups. The sponsor stated general education teachers and special education teachers are therefore not contingent on each other being in the room together, and a special education teacher could pull a group of students as needed. Lastly, the Executive Director asked for updates on the school's fundraising efforts, as the budget included in the application was reliant on unsecured dollars. The sponsor stated that the fundraising goals set forth in the application have been exceeded and that they currently have \$650,000 secured upon authorization, with an opportunity to apply for an additional \$1.3 million in grant funding.

The public hearing concluded with closing statements by both parties and the receipt of fourteen in-person comments, with five speaking in support of MNPS and nine speaking in support of Encompass. The Commission also accepted written comments, and the Commission received 288 written comments, with one writing in support of MNPS and 287 writing in support of Encompass.

### 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,"<sup>6</sup> whether "approval of the application is in the best interests of the students, LEA, or community."<sup>7</sup> 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 MNPS, 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 Encompass amended application did rise to the level of meeting or exceeding the standards required for approval.

I agree with the Review Committee that the sponsor's academic plan meets the standard for approval. I believe the sponsor named a clear mission and vision for its academic model. Further, the academic model proposed by the sponsor is unique to Nashville, specifically the clusters of Whites Creek and Pearl Cohn. The sponsor clearly articulated an academic model that was research-based and thoroughly supported by evidence. One of the purposes of public charter schools is to "improve learning for all students and close the achievement gap between high and low students...."<sup>8</sup> The sponsor has named an intent to combine various methods into a unique program to offer families in the named Metro Nashville area. I believe that the use of mastery-based learning coupled with whole-child development can offer a high-quality choice to the students who would attend Encompass Community School if approved. Additionally, I believe the academic model that the sponsor has designed contains strong evidence of its ability to serve special populations, including English learners. The sponsor included plans for service to students with disabilities while remaining true to its academic model. This model has proven effective in other schools and in other

<sup>&</sup>lt;sup>6</sup> T.C.A. § 49-13-108(5)(E).

<sup>&</sup>lt;sup>7</sup> Id.

<sup>&</sup>lt;sup>8</sup> T.C.A. § 49-13-102(a)(1).



cities, and this school would complement the academic offerings currently in Nashville.

I also believe the sponsor was intentional in the communities they sought to serve through this model. The sponsor stated in the application, reiterated during the capacity interview, and testified during the public hearing that the members of the Encompass Community School team spent a significant portion of time engaging with families in the targeted areas to specifically design an academic model that met the needs and desires of those communities. That work with the families of the community will serve Encompass well as a public charter school if approved by this Commission. It is through that outreach that I also find confidence in the enrollment named in the application.

The sponsor has indicated the Year 1 targeted enrollment of 105 students serving kindergarten through third grade. The sponsor testified that through its community outreach, they identified 274 families who would have children eligible to enroll for Year 1, if this school is approved. This evidence bolsters the sponsor's argument that this unique option is strongly desired in the Whites Creek and Pearl Cohn clusters. MNPS testified during the public hearing that charter schools within the targeted clusters were not at their enrollment capacities currently. In building the record for the Commission's consideration, I asked the district to provide evidence and/or data supporting this testimony. I believe the MNPS evidence does not support the assertion made during the public hearing. MNPS's evidence indicates that in the Pearl Cohn cluster, two public charter schools currently operate, and one of the charter schools does have a current waitlist. It is also important to note that, based on the 2023 Tennessee Department of Education's Federal Accountability designations, all zoned schools in the Pearl Cohn clusters are designated as Comprehensive Support and Improvement schools, underscoring the need for a high-quality option in the area. With regard to the Whites Creek cluster, MNPS could not provide evidence if a waitlist exists for the two charter schools in that cluster because the charter schools run their own lotteries. If MNPS intends to cite charter school enrollment capacity as a reason for denial, the district needs to be able to provide verification of that assertion. Based on the evidence provided by MNPS, I find that not only is there a desire for a high-quality choice option in the named areas, but there is also space and capacity for a school like Encompass to meet its enrollment targets.

I think it is also important to note that Encompass has named a strong founding leader as a vital first step. The proposed school leader's experience, specifically her experience in leading a special education department for a public charter school in Nashville, makes her uniquely qualified to serve as the head of Encompass Community School if approved. The intentionality of the governing board's hiring of Ms. Garry to lead Encompass Community School is a testament to their readiness to operate a public charter school in Nashville.

Further, I agree with the Review Committee that the operations plan overall meets the standard for approval. The sponsor has established a diverse board that is keenly aware of the expectations and responsibilities of its members. The board members appear prepared to lead the work of operating a public charter school in a way that is designed for success as well as to intervene when and if gaps are identified. The diverse experience of the board members is evident in various aspects of the application. I will also highlight the sponsor's facility plan. Within the application, the sponsor named a facility option that was under a non-disclosure agreement, and because of this agreement, the information that the sponsor could provide was limited. This was named as a reason by MNPS for a finding of partially meeting the standard for approval. However, the district held too high of a bar when evaluating the sponsor's facility proposal. The Department's rubric requires a facility plan, with specifics around needs related to projected enrollment. It does not require a specific facility to be identified and named within an application. The sponsor met the burden of the rubric in the amended application by indicating that the chosen facility met the educational needs and enrollment projections. In addition, it further encourages my recommendation for approval that since the submission of the amended application, the sponsor has made further progress on the identification and acquisition of a facility in which they can open in the 2025-26 school year.



Finally, I agree with the Review Committee that the sponsor's financial plan meets the standard for approval. I am encouraged that the sponsor has surpassed its fundraising goal of \$300,000 before any authorization. There are several unknown costs that operators can encounter when opening a public charter school, and the sponsor has testified to plans to increase the funds available to them, giving me confidence surrounding any financial contingencies they may face if approved. Finally, MNPS identified the sponsor's plan to outsource financial responsibilities as a concern. Not only is this a common practice amongst public charter schools, but it is also not concerning when reviewing the ability and knowledge of the board members to provide the necessary oversight of any parties with which the school may contract. I agree with the Review Committee that the sponsor's budget is conservative and is supported by the board and its financial expertise. The board members also named connections in Nashville that are available to support the fiscal success of Encompass Community School. I believe the sponsor is more than prepared to undertake the start-up financing necessary to establish a public charter school and that increases my assurance of a recommendation for approval of this application.

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. If approved, Encompass will offer an academic model that is not currently available within Nashville, and it will provide a high-quality option for families in an area of Nashville with limited options.

For the reasons expounded on in this report, I recommend that the Commission approve the Encompass amended application.

### CONCLUSION

For these reasons, and for the reasons stated in the Review Committee Recommendation Report attached hereto as **Exhibit A**, I believe that the decision to deny the amended application for Encompass was contrary to the best interests of the students, the LEA, or community. Therefore, I recommend that the Commission overturn the decision of the MNPS Board of Education to deny the amended application for Encompass.

Jess Stoull

<u>10/18/24</u>

Date

Tess Stovall, Executive Director Tennessee Public Charter School Commission



# EXHIBIT A

# **Charter Application Review Committee Recommendation Report**

October 18, 2024

School Name: Encompass Community School

Sponsor: Encompass Community School

Proposed Location of School: Metro Nashville Public Schools

Evaluation Team:

- Kristine Barker
- Trent Carlson
- Melanie Harrell
- Grant Monda
- Rebecca Ledebuhr



### 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<sup>1</sup>, 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. <u>Evaluation of the Proposal</u>: 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 three sections of the application: Academic Plan and Design, Operations Plan and Capacity, and Financial Plan and Capacity.
- 2. <u>Capacity Interview</u>: 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 leader (if applicable) to address the concerns, weaknesses, and questions identified in the application, and to assess the capacity to execute the application's overall plan.
- 3. <u>Consensus Judgment</u>: 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. <u>Summary of the Application</u>: A brief description of the applicant's proposed academic, operations, and financial plans.

<sup>&</sup>lt;sup>1</sup> All Commission rules and policies may be found on the Commission's <u>website</u>.



- 2. <u>Summary of the Recommendation</u>: A brief summary of the overall recommendation for the application.
- 3. <u>Analysis of each section of the application</u>: 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 vision; enrollment summary; academic focus and plan; academic performance standards; assessments; school calendar and schedule; special populations; school culture and discipline; recruitment and enrollment; parent and community engagement and support; and the capacity to implement the proposed plan.
  - b. Operations Plan and Capacity: governance; start-up plan; facilities; personnel/human capital; professional development; insurance; transportation; food service; additional operations; and the capacity to implement the proposed plan.
  - c. Financial Plan and Capacity: planning and budget worksheet; budget narrative; and the capacity to implement the proposed plan.

The Commission's charter application Review Committee utilized the Tennessee Department of Education's Application to Create a Public Charter School Scoring Criteria ("the rubric"), which is used by all local boards of education when evaluating an application. The rubric states:

An application that merits a recommendation for approval should present a clear, realistic picture of how the school expects to operate; be detailed in how this school will raise student achievement; and inspire confidence in the applicant's capacity to successfully implement the proposed academic and operational plans. In addition to meeting the criteria that are specific to that section, each part of the proposal should align with the overall mission, budget, and goals of the application.

Rating	Characteristics		
Meets or Exceeds Standard	The response reflects a thorough understanding of key		
	issues. It clearly aligns with the mission and vision of the		
	school. The response includes specific and accurate		
	information that shows thorough preparation.		
Partially Meets Standard	The 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 response is incomplete; demonstrates lack of		
	preparation; does not align with the mission and vision of		
	the school; or otherwise raises significant concerns about		
	the viability of the plan or the applicant's ability to carry it		
	out.		

The evaluators used the following criteria and guidance from the scoring rubric to rate applications:



## Summary of the Application

School Name: Encompass Community School

Sponsor: Encompass Community School

Proposed Location of School: Metro Nashville Public Schools

<u>Mission</u>: At Encompass Community School, we leverage a mastery-based, student-centric approach to ensure all students thrive academically and personally.<sup>2</sup>

Number of Schools Currently in Operation by Sponsor: There are no schools currently in operation by the sponsor.

Proposed Enrollment:3

Grade Level	Year 1:	Year 2:	Year 3:	Year 4:	Year 5:	At Capacity:
	2025-2026	2026-2027	2027-2028	2028-2029	2029-2030	
К	42	52	52	52	52	52
1	21	52	52	52	52	52
2	21	26	52	52	52	52
3	21	26	26	52	52	52
4		26	26	26	52	52
5			26	26	26	52
6				26	26	52
7					26	52
8						52
Totals	105	182	234	286	338	468

Brief Description of the Application:

The sponsor, Encompass Community School, is proposing to open a charter school in Davidson County, Tennessee and serve students in kindergarten through eighth grade when fully built out. The school, Encompass Community School ("Encompass"), is a new-start school and would be the first school for the sponsor. The school intends to operate in the Whites Creek and Pearl Cohn communities of Davidson County to "provide an evidence-based, innovative, and equitable model in an area with few high-quality options."<sup>4</sup> The school proposes to offer an inclusive-by-design school that fosters academic and personal growth while reducing barriers experienced in traditional schools and provide an opportunity for students in the Whites Creek and Pearl Cohn clusters additional school options.

The proposed board of directors will be comprised of governance, finance, academic, executive, community engagement (ad-hoc), and facilities (ad-hoc) committees. In Year 0, Encompass has budgeted \$634,708 in revenue, receiving \$234,708 from the Charter School Program ("CSP") start-up grant and \$400,000 of philanthropy, and projects \$485,380 in expenses for the school. Encompass projects \$2,398,802 in revenue and \$2,282,189 in expenses in Year 1, resulting in a balance of \$265,941. By Year 5, the school projects to have \$5,680,075 in revenue and \$5,325,789 in expenses, resulting in a positive ending fund balance of \$1,143,411.<sup>5</sup> The school anticipates that 75% of the student

<sup>&</sup>lt;sup>2</sup> Encompass Community School Amended Application, pg. 10

<sup>&</sup>lt;sup>3</sup> Encompass Community School Amended Application, pg. 54

<sup>&</sup>lt;sup>4</sup> Encompass Community School Amended Application, pg. 30

<sup>&</sup>lt;sup>5</sup> Encompass Community School, Amended Budget



population will qualify as economically disadvantaged, 18% of the student population will be students with disabilities, and 13% of the student population will be English learners ("EL").<sup>6</sup>



## Summary of the Evaluation

The Review Committee recommends the approval of the amended application for Encompass Community School because the applicant proposes to bring an innovative academic model to a community with limited highquality, public options, has assembled a strong founding governing board, has a viable facility plan, and has secured start-up funding and philanthropic dollars to support a successful school opening.

The academic plan presented by the applicant meets or exceeds standard because the application provides a robust community engagement plan that includes community feedback, presents a compelling, research-based, and evidence-backed model, and the academic model can be adapted and tailored to meet the needs of special populations of students. The Review Committee noted a particular strength in the applicant's community engagement efforts, which have led the applicant to design a school model that fits the needs and desires of the target communities and resulted in a significant number of interest-to-enroll forms from eligible families. Additionally, the application includes research and evidence supporting the success of the proposed academic model, which would be innovative for the area. The Review Committee also found the academic model to be tailored to meet the needs of students with disabilities and English learner students, and the proposed school leaders and board members demonstrated experience and capacity to execute the model with fidelity.

The applicant's operations plan meets or exceeds standard because the founding board members have a diverse array of expertise to support and oversee the school, there is a realistic, viable facility plan, and the application includes a robust professional development plan to support teachers within the academic model. The Review Committee found the processes set in place for governance and oversight of the proposed school to be well-developed, and the board members who participated in the capacity interview demonstrated a clear understanding of their individual roles and responsibilities in supporting the school. Through the capacity interview, the Review Committee garnered updates regarding the applicant's facility plan, which include a letter of intent submitted to a desired facility, as well as realistic, viable contingency plans. The Review Committee also noted the applicant's professional development plan to be a particular strength and positions the school to effectively support and train teachers within the academic model.

The financial plan meets or exceeds standard because the applicant has secured grants and philanthropic dollars to support start-up costs, uses conservative and reasonable estimates in its budgeting, and demonstrates financial capacity with its board and back-office provider. Through the application and capacity interview, the Review Committee found that the applicant has secured a substantial amount of start-up funding, including exceeding their fundraising goals, which will allow the school to start in a strong financial position.

### 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	Meets or Exceeds Standard		
Operations Plan and Capacity	Meets or Exceeds Standard		
Financial Plan and Capacity	Meets or Exceeds Standard		



## Analysis of the Academic Plan and Design

Rating: Meets or Exceeds Standard

#### **Strengths Identified by the Committee**

The applicant's Academic Plan and Design meets or exceeds standard because the application provides a robust community engagement plan that includes community feedback, presents a compelling, research-based, and evidence-backed model, and the academic model can be adapted and tailored to meet the needs of special populations of students.

The Review Committee found that the mission and vision of bringing this specific academic model to the targeted communities was compelling. The application provided extensive data as to why the targeted clusters were chosen for the proposed school, and in the capacity interview, the applicant addressed questions regarding potential enrollment. As explained in the application and during the capacity interview, there are a limited number of highquality, public options in the Whites Creek and Pearl Cohn clusters. For example, all zoned schools in the Pearl Cohn cluster currently have a Comprehensive Support and Improvement ("CSI") designation, indicating they are performing in the bottom 5% of schools in Tennessee. The application clearly articulated how community engagement efforts within these north Nashville communities led to a greater understanding of families' desire for more support, smallgroup instruction, and a different model than what is currently being offered. During the capacity interview, the applicant shared an update regarding enrollment efforts, stating 675 interest-to-enroll forms have been collected, 274 of which are from families with children who would be eligible to enroll in the 2025-26 school year. Considering the enrollment goals outlined within the application, the Review Committee found this to be evidence of a strong community engagement plan. Additionally, the applicant stated in the capacity interview they conducted a feasibility study of the area to ensure there was enough students to sustain the school's enrollment targets, which afforded them the opportunity to engage directly with families and led them to designing the proposed academic model specifically for the targeted clusters.

The proposed academic model was found to be a strength of the application, as it is research-based and evidence-backed, and the founding board and school leadership understand how it aligns to requirements under Tennessee state law. An extensive amount of research is provided within the application in support of the model, which leverages a mastery-based, student-centric approach to ensure equitable support for all students. Upon the initial review of the application, the Review Committee had questions as to how the multi-age student groupings would work in practice and therefore sought to garner further understanding within the capacity interview. The applicant clarified the process in which students would receive grade-level content instruction and break into multi-age groups determined by student mastery, demonstrating clear expertise among the proposed school leader and founding board members.

As stated by the applicant, this model would be innovative for the area and would directly support closing achievement gaps among subgroups of students. The Review Committee noted that the adaptability and flexibility of the model will afford the school greater ability to meet the needs of all students, particularly students with disabilities and EL students. The proposed school leader has experience leading a special education department in a public charter school in Nashville, which the Review Committee found to be a strength, and it was clarified in the capacity interview that the entire school model was built with students' unique needs in mind. For example, required services and additional interventions are what drive student schedules, rather than services and interventions being fit into a prescribed schedule. During the capacity interview, the applicant team was able to answer questions the Review Committee had regarding the extent to which student and staff schedules could be adjusted based on student needs, and the applicant detailed its plans for scheduling student services and contingencies based on student needs.



# Analysis of the Operations Plan and Capacity

Rating: Meets or Exceeds Standard

### **Strengths Identified by the Committee**

The applicant's Operations Plan Design and Capacity meets or exceeds standard because the founding board members have a diverse array of expertise to support and oversee the school, there is a realistic, viable facility plan, and the application includes a robust professional development plan to support teachers within the academic model.

The Review Committee found the proposed governing board to be a strength of the application. The founding board members bring diverse professional expertise, represent the local community, and, within the capacity interview, demonstrated the ability to effectively support and monitor the school. There are mechanisms in place for monitoring and evaluating the school's performance in academics, operations, and financial matters, and all board members present for the capacity interview clearly demonstrated an understanding of their roles and responsibilities. The board will be comprised of a board committee structure that is aligned to best practice and will include the participation of volunteers for further community and stakeholder representation.

The Review Committee had questions regarding the facility plan included within the application, as it stated the applicant is under a non-disclosure agreement ("NDA") with a potential facility. During the capacity interview, the Review Committee was able to garner further information, including potential contingencies, about the facility plan. For example, the applicant stated that a letter of intent ("LOI") has been submitted to a newly identified facility, and they expect to move forward on a lease upon authorization. Additionally, it was clarified that this new facility option is the priority location, and the location identified within the application is now a viable contingency option. The new facility that Encompass intends to move forward with requires minimal improvements, as it is already configured for educational services, and has adequate space for the proposed academic program. The applicant also stated that in their current negotiations, there is the ability to request additional time at the facility as needed, as the building has additional square footage to support the school while it identifies its permanent, long-term facility. The Review Committee determined that these updates, along with corresponding updates to the applicant's start-up timeline, were adequate and provided a realistic, viable facility plan. Additionally, updates were provided regarding the start-up plan throughout the capacity interview, demonstrating the founding board and proposed school leader's capacity for effective oversight of school operations.

Another strength of the operations plan was the professional development plan for teachers and leaders. The application details the wide variety of trainings that will be offered from internal and external sources, which begin with a summer learning program and continue throughout the school year. The innovative, mastery-based model requires teachers to lead whole-group and differentiated small-group instruction, and there was a clear, robust professional development plan within the application. While the Review Committee did have remaining questions around staffing, specifically the applicant's intent to rely on hiring dually certified staff, the applicant adequately addressed staffing plans and stated fundraising goals have been exceeded, therefore giving them more potential flexibility in hiring and staffing plans.



# Analysis of the Financial Plan and Capacity

Rating: Meets or Exceeds Standard

#### **Strengths Identified by the Committee**

The applicant's Financial Plan and Capacity meets or exceeds standard because the applicant has secured grants and philanthropic dollars to support start-up costs, uses conservative and reasonable estimates in its budgeting, and demonstrates financial capacity with its board and back-office provider.

Through the amended budget included in the application and further information garnered during the capacity interview, the Review Committee found that the applicant has secured grants and philanthropy dollars to support necessary start-up costs. The school has secured the Charter Schools Program ("CSP") grant upon authorization, which amounts to \$750,000 over the first three years of operation. During the capacity interview, the applicant shared updates regarding additional sources of potential grant revenue, including \$215,000 from the NewSchools Venture Fund, commitments upon authorization from City Fund and the Nashville Incubator totaling up to \$350,000, and a potential grant from the Joe C. Davis Foundation. While the Review Committee had questions about the pre-opening budget's reliance on unsecured philanthropic funds, the applicant stated in the capacity interview that they have exceeded their own fundraising goals since the amended budget was prepared and will have the opportunity post-authorization to continue fundraising efforts. The Review Committee found these sources of secured dollars, as well as promising developments likely to materialize in additional money, to be a strength of the application.

Throughout the budget, the applicant uses conservative and reasonable estimates for costs, which the Review Committee found will afford the opportunity to be flexible as needed. When the Review Committee asked about specific estimates initially found to be potentially underestimated, such as facility improvements, the applicant was able to provide specific rationale as to the estimates used, ultimately providing the Review Committee confidence that budget estimates are sound and reasonable. The Review Committee noted this will support the applicant in contingencies, such as the potential need for an additional bus route or an additional certified staff member.

Lastly, the Review Committee found there to be sufficient financial expertise amongst the proposed board, as well as through the school's proposed back-office provider. Additionally, with the founding board members' strong ties to the Nashville community, they have already developed relationships with local organizations who can support and ensure the financial success of the school. During the capacity interview, board members spoke directly about potential financial contingencies, including potentially securing a line of credit if needed, that demonstrated the financial capacity of the leadership team.



## **Evaluation Team**

**Kristine Barker** has over fifteen years of experience designing and implementing solutions to improve outcomes for students from the school, CMO, district and state levels. Kristine has a focused skill set in developing and executing on innovative solutions to improve education policies and practices. At the state level, she was responsible for designing and refining authorization and oversight processes for all schools, sites, and programs within the Office of School Choice. She served as the state's charter authorizing content expert for state and local charter schools, overseeing the charter application, opening, and school transition processes. She led cross-departmental collaboration within the Department of Education, assisting local superintendents throughout the state, and leading frequent informational sessions for potential applicants. At the district level, Kristine developed innovative long-term portfolio strategies to meet the needs of the public school system and leveraged data to drive policy and practices to ensure stability and long-term success of the district. She oversaw the charter application process from recruitment, application, and school opening processes, continually improving equity and transparency.

**Trent Carlson** is the Authorizing Coordinator for the Tennessee Public Charter School Commission. Prior to joining the Commission, Trent worked in Nashville schools as a middle school teacher in both the public school district and a local public charter school. Trent was a Teach for America corps member and a Leadership for Educational Equity policy and advocacy summer fellow. Trent received an M.Ed. from Lipscomb University and a B.A. from the University of Alabama, where he studied Journalism, Political Science, and History.

**Melanie Harrell** is the Director of Finance and Operations for the Tennessee Public Charter School Commission. Prior to working at the Commission, Melanie worked as a fiscal consultant for RePublic Charter Schools, and as the Charter School Program manager at the Tennessee Department of Education. She was a Teach For America corps member and spent three years as a classroom teacher at a charter school in Dallas County, TX where she also served as the Humanities Department Chair. She received her M.P.P in Education Policy from Vanderbilt University, and her B.A. in Political Science and Philosophy from TCU.

**Grant Monda** joined the Aurora Collegiate Academy Team in 2015, currently serving as its Executive Director. Aurora is a tuition- free public charter elementary school serving students from all over Shelby County. Grant joined Aurora after completing the prestigious Ryan Fellowship. In addition to his work at Aurora, Grant has previously taught in Memphis City Schools as a Teacher For America Corps member and served as a district level coach and evaluator with Shelby County Schools. Grant has reviewed charter applications for the state and Shelby County Schools. He holds a Bachelor of Arts degree from Rhodes College and a Master's in Education from Christian Brothers University.

**Rebecca Ledebuhr** is the Data and Accountability Coordinator at the Tennessee Public Charter School Commission. Before taking on her role at the Charter Commission, Rebecca spent fourteen years working in public schools in North Carolina and Tennessee. Most recently, she served as an instructional coach for mathematics at an MNPS public charter school. Rebecca has served on the Nashville Public Education Foundation's and Mayor's Teacher Cabinet, as a mentor teacher for the Nashville Teacher Residency, and as a Tennessee Educator Fellow for the State Collaborative on Reforming Education ("SCORE"). Rebecca holds a B.A. in Philosophy and Religion from James Madison University.