



## Via Email and Hand-Delivery

August 1, 2025

Tennessee Public Charter School Commission
Attn: Tess Stovall, Executive Director
Beth Figueroa, Director of Authorizing
500 James Robertson Parkway 5<sup>th</sup> Floor Davy Crockett Tower
Nashville, TN 37243
CharterSchool.Appeals@tn.gov

Re: Appeal of Rutherford County Schools Denial of Rocketship TN4's Charter Application

Dear Ms. Stovall and Ms. Figueroa,

Pursuant to Tennessee Code Section § 49-13-108, Rocketship Education Tennessee ("RSED-TN") submits this letter to initiate its appeal before the Tennessee Public Charter School Commission ("TPCSC") of the July 24, 2025 decision made by the Rutherford County Schools ("RCS") Board ("RCS Board") to deny RSED-TN's amended new start charter application (the "Application") of Rocketship TN4 ("TN4").

The RCS Board's decision does not reflect the full merits of the Application, which, when reviewed, meet or exceed the standards outlined by the Tennessee Department of Education. An approval of TN4 is in the best interests of students, families, and the community, and the Application meets or exceeds evaluation standards, TPCSC should approve the Application and authorize TN4 for operation within Rutherford County.

## 1. Approval of the Application Is in the Best Interest of Students, Families, and the Community.

For over a decade, Rocketship has delivered high-quality education in Tennessee, operating safe, joyful learning environments within modern, well-equipped facilities. All three RSED-TN schools have earned recognition for their impact on student achievement<sup>1</sup>, two have recently received unanimous charter renewals<sup>2</sup>, and the region was awarded a FY26 Charter School Program grant to support TN4<sup>3</sup>. These accomplishments, unanimous charter approvals, and financial investments<sup>4</sup>, demonstrate broad confidence in Rocketship's ability to deliver transformative student outcomes in Tennessee, a strong foundation on which Rocketship is committed to bringing the same academic excellence, student growth, and community partnership to TN4.

Rocketship's elementary-only model is centered on accelerating academic growth for all students through personalized learning and by fostering close partnerships with families and the communities served. This approach has delivered positive results. Between Fall 2021 and Spring 2024, Rocketship schools in Tennessee nearly doubled the percentage of students performing at or above grade level on the nationally normed NWEA MAP assessment. In 2024 alone, Tennessee Rocketeers achieved an average of 1.38 years of growth in reading and 1.29 years in math on the NWEA MAP, marking the region's highest gains in three years. This is equivalent to an additional 68 days of learning in reading and 52 additional days in math within a single school year.

<sup>&</sup>lt;sup>1</sup> The State of Tennessee designated Rocketship Nashville Northeast Elementary as a Reward School in 2018–19 and Rocketship United Academy in 2017–18, 2021–22, and 2022–23. Rocketship Dream Community Prep earned a Level 5 on the Tennessee Value-Added Assessment System for 2022–23.

<sup>&</sup>lt;sup>2</sup> Rocketship United Academy and Rocketship Nashville Northeast Elementary, recently received unanimous charter renewals from MNPS and TPCSC, respectively, allowing Rocketship to continue serving students and families for another ten years.

<sup>&</sup>lt;sup>3</sup> The federal Charter School Program is a competitive grant designed to expand access to high-quality charter schools and empower parents to choose the educational option that best meets their child's needs.

<sup>&</sup>lt;sup>4</sup> A broad coalition of private, national, and local education investors including City Fund, Charter School Growth Fund, and Scarlett Family Foundation support Rocketship's growth in Tennessee.

<sup>&</sup>lt;sup>5</sup> Engaged parents are a core pillar of Rocketship's model and critical to our Rocketeers and their long-term success. Beyond supporting their own students, the community is improved by parent voice in our daily work and as external advocates on Parent Organizing Committees.

<sup>&</sup>lt;sup>6</sup> Rocketship's national network of public elementary schools has demonstrated strong educational performance, as shown in a 2023 Stanford University CREDO study of over 3 million students. The study found that public charter school students outperform traditional public school students and identified Rocketship as a "gap-busting" network within the charter sector.

<sup>&</sup>lt;sup>7</sup> Between Fall 2021 and Spring 2024, the percentage of RSED-TN students performing at or above grade level rose from 27% to 53% in math, and from 25% to 55% in reading, based on NWEA MAP assessment data.



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Rocketship's proven success in Tennessee, combined with the urgent need for additional elementary capacity in Rutherford County, make a compelling case that TN4 is well positioned to deliver strong outcomes for students in the LaVergne/Smyrna area. Rutherford County has experienced significant population growth in recent years, leading to a districtwide rezoning within the RCS system, yet many schools remain overcapacity with enrollment at 105% or higher. Alongside overall population growth, a notable rise in English Language Learner ("<u>ELL</u>") students has created an urgent need for expanded ELL program within the county. RSED-TN has demonstrated strength in serving ELL students, and TN4 is uniquely qualified to meet the critical community need. Approving this appeal would expand access to a high-quality public school option for families who are currently underserved or attending overcrowded schools.

## 2. The Application Meets or Exceeds the Metrics Outlined in the Department of Education's Application Scoring Rubric.

On July 24, 2025, the RCS Board voted to deny the Application based upon the RCS Charter Review Committee Findings ("<u>Findings</u>") indicating the Application did not meet or exceed all standards on the required sections of the Tennessee Charter New Start Application Rubric (the "<u>Rubric</u>"). RSED-TN maintains that an objective read of the record demonstrates that the Application meets or exceeds the Rubric's standards, and on that basis, it appeals the decision of the RCS Board.

A. The Application Meets or Exceeds Standards in Academic Plan and Capacity.

As acknowledged by the Findings, RSED-TN's record of success demonstrates the strength of its academic program. In an attempt to substantiate its denial of a strong charter application, the RCS Board misconstrued charter requirements, and drew unsupported conclusions to justify a partial rating. The RCS Board's reasoning suggests an expectation that TN4 replicate RCS practices, rather than offer the innovative school choice envisioned by the Tennessee Public Charter Schools Act. There is absolutely no requirement to replicate RCS practices. First, by way of example, while state standards do not require fixed instructional time for Science and Social Studies at the elementary level, the RCS Board faulted the Application for not specifying time allotments. The record reflects that RSED-TN portfolio schools have demonstrated strong instruction in these subjects using high quality science curriculum and social studies content embedded in CKLA Amplify curriculum. This Application cannot be discredited for failing to specify time blocks for these subjects, as this is <u>not</u> required. Second, RCS Board suggests that a focus on Life Skills Development "may" not align with RCS goals and policies and "could" have a negative impact on student performance on state standards assessments, yet no evidence substantiates these conclusions or justifies discounting the Application's score.<sup>8</sup>

B. The Application Meets or Exceeds Standards in Operations Plan and Capacity.

The Findings acknowledge the Application meets or exceeds standards in this area of Operational Plan and Capacity.

C. The Application Meets or Exceeds Standards in Financial Plan and Capacity.

Rocketship is a known quantity, and it has been serving in Tennessee for over a decade. Even the Findings recognize Rocketship's history of financial success and stability in operating charter schools. The Findings highlight RSED-TN's proven fiscal success and plan to open TN4, and praise RSED-National's extensive financial expertise and support for RSED-TN. Despite these expressions of confidence in the organization's long-term financial viability, the Findings rate the Application as only "partially meets" the standard for Financial Plan and Capacity. This conclusion rests solely on TN4's plan to seek a state-permitted waiver for slightly higher student-teacher ratios and the absence of a school counselor in the budget. TN4's staffing model is intentionally designed to support its personalized learning model. Rejecting legally permissible differences from the RCS model contradicts the Rubric's guidance, state charter law allowing for flexibility, and overlooks the

<sup>&</sup>lt;sup>8</sup> One of the Findings reasons for downgrading the Application's score to partially meets is the suggestion that Life Skills instruction may remove students "from core content instruction, potentially resulting in a negative impact on student performance on state standards and assessments.". However, the Application clearly states Life Skills occur outside instructional time, and the record contains no evidence of negative impact on student performance.

 $<sup>^9</sup>$  Similar authorizer-approved waivers have been approved and successfully implemented by the three other RSED-TN schools.

<sup>&</sup>lt;sup>10</sup> The Application's budget does not include a professional titled "school counselor"; however, it includes funding for a social worker, a role RSED-TN's believes is more appropriate to serve TN4's anticipated student population.



comprehensive evidence in the Findings and Rocketship's historical track record. Given RSED-TN's strong financial record of success, the Application clearly Meets or Exceeds the standard.

D. The Application Meets or Exceeds Standards in Portfolio Review and Performance.

The Portfolio Review should have resulted in a meets or exceeds rating. The Findings failed to fairly evaluate RSED-TN's overall performance over the course of over a decade's body of work by focusing disproportionately on one school facing first-time challenges. Instead, this review should have considered the overwhelming success of the three schools over their years of service, and if any singular comparison were to be made (which it should not), the review should have focused on the school anticipated to be most similar to TN 4, Rocketship Dream Community Prep ("RDCP")<sup>11</sup>.

RSED-TN operates three elementary schools in Davidson County. RDCP and Rocketship United Academy ("RUA") both perform exceptionally well, regularly earning A and B growth ratings, Level 4 or 5 TVAAS scores, and recognition as Tennessee Reward Schools. Rocketship Nashville Northeast ("RNNE") has operated for 11 years, receiving strong ratings for 9 of those. In 2023-2024, RNNE experienced a change in its performance, with its TVAAS score dropping to Level 2 after years of Level 4 or 5 ratings. The Findings focus on this recent drop while ignoring both RNNE's prior achievements, history of outperforming local district schools, and RSED-TN's clear plan for recovery and growth, including new resources and staffing changes.

In response to RNNE's recent data, RSED-TN began designing and implementing an improvement plan aimed at strengthening RNNE in particular, and RSED-TN's entire region, including TN4, if approved. This plan includes leadership changes: new Executive Director and principal appointments for 2024–2025, and the hiring of Ms. Carly Reiss, an experienced Rocketship leader with award-winning success in another Rocketship region, and strong personal ties to Tennessee, as Director of Schools for 2025–2026. These changes, combined with targeted corrective measures, are expected to restore RNNE's performance to prior levels, rivaling those of RUA and RDCP.

Driven by data, RSED-TN will continue analyzing outcomes and engaging in a continuous improvement project until RNNE's challenges prove out to be a temporary setback in its longstanding record of excellent education for RNNE students. The same data-driven, continuous improvement approach will apply to the other RSED-TN schools, and TN 4 if authorized.

Recent fluctuations at one RSED-TN school should not overshadow the overall record: Rocketship schools have generally outperformed other schools within their district or geographic cluster across comparable metrics during the past ten years. Moreover, insofar as TN 4 is concerned, RSED-TN is prepared to serve LaVergne/Smyrna children well, and to meet any challenges that may arise.

E. The Application Should Have Been Approved As It Meets or Exceeds the Rubric's Standards.

Under the Rubric, the Application should have been approved. The RCS Board's reliance on the staff recommendation demonstrating multiple instances of misinterpretations and misapplications of applicable standards, fails to support its denial of a strong petition by a proven provider. Accordingly, RSED-TN submits this appeal seeking TPCSC's independent, de novo review with the belief that this Application will achieve a score of "Meets" or higher in all required sections.

Should your team have additional questions regarding this appeal, please do not hesitate to contact me directly.

Sincerely,

Cric Dailey

Eric Dailey Executive Director Rocketship Education Tennessee

<sup>&</sup>lt;sup>11</sup> RDCP operates just over the Rutherford/Davidson County border from the TN4 planned location.