



Executive Director's Recommendation The Rock Academy 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 June 20, 2025, the sponsor of The Rock Academy ("sponsor" or "The Rock") appealed the denial of its amended application by the Metropolitan 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 Rock Academy amended application was contrary to the best interests of the students, local education agency ("LEA"), or community.¹ Therefore, I recommend that the Commission overturn the decision of the MNPS Board of Education to deny the amended application for The Rock Academy.

STANDARD OF REVIEW

Pursuant to T.C.A. § 49-13-108 and Commission Policy 2.000, Commission staff and an independent charter application review committee conducted a de novo, on the record review of The Rock Academy amended application. In accordance with the Tennessee Department of Education's Charter Creation Application Evaluation Guidance and Review Tool ("rubric"), "[t]o be eligible for approval, an application must receive a "Meets or Exceeds Standard" rating for all applicable sections [(academic plan and design, operations plan and capacity, financial plan and capacity, and portfolio review and performance record)]."² In addition, the Commission is required to hold a public hearing in the district where the proposed charter school seeks to locate.³

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

¹ T.C.A. § 49-13-108.

² Tennessee Department of Education's Charter Creation Application Evaluation Guidance and Review Tool, pg. 3.

³ T.C.A. § 49-13-108.

the best interests of the students, local education agency, or community.⁴ 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 November 29, 2024, the sponsor submitted a letter of intent to Metropolitan Nashville Public Schools expressing its intention to file a charter school application.
2. The sponsor submitted its initial application for The Rock Academy to MNPS on February 3, 2025.
3. MNPS assembled a review committee to review and score The Rock Academy initial application.
4. On March 24, 2025, MNPS's Review Committee conducted a capacity interview with representatives of The Rock Academy.
5. MNPS's Review Committee reviewed and scored The Rock Academy's initial application, indicating deficiencies in Academic Plan and Design, Operations Plan and Capacity, and Financial Plan and Capacity, specifically concerning facilities, transportation, and operational budget.
6. On April 22, 2025, MNPS Board of Education voted to deny The Rock Academy initial application.
7. The sponsor amended and resubmitted its application for The Rock Academy to MNPS on May 23, 2025.
8. MNPS's Review Committee reviewed and scored The Rock Academy amended application based on the charter application-scoring rubric and rated the academic section, the operations section, and the finance section as partially meets the standard.
9. On June 10, 2025, the MNPS Board of Education voted to deny the amended application of The Rock Academy.
10. The sponsor appealed the denial of The Rock Academy's amended application in writing to the Commission on June 20, 2025, including submission of all required documents per Commission Policy 2.000.
11. The Commission's Review Committee independently analyzed and scored The Rock Academy amended application using the Tennessee Department of Education's charter

⁴ T.C.A. § 49-13-108.

school application-scoring rubric.

12. The Commission's Review Committee conducted a capacity interview with key members of The Rock Academy leadership team on August 7, 2025 via Microsoft Teams.
13. After the capacity interview, the Commission's Review Committee determined a final consensus rating of The Rock Academy amended application, which served as the basis for the Review Committee Recommendation Report, attached hereto as **Exhibit A**.
14. On August 8, 2025, 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 Rock Academy amended application.
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 Rock Academy initial application consisted of the following individuals:

Name	Title
Gay Burden	External Consultant
Cordarrell Cobb	Partner School Budget Strategy
Sonya Dobbs	Director of Exceptional Education School Support
Ryan Latimer	Director Boundary Planning and Enrollment
Shawn Lawrence	Deputy Chief of Schools
Jamie Lomax	Executive Director of Student Services
Casey Megow	Executive Director Facility Maintenance and Construction
Maggie Proffitt	Coordinator English Language Learners
Sudhir Sinha	Coach Data
Ken Stark	Executive Director Operations
KC Winfrey	Executive Director of Schools

The Rock Academy 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 22, 2025. The MNPS Board of Education voted to deny the initial application of The Rock Academy.

District Denial of Amended Application

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

Name	Title
Gay Burden	External Consultant
Cordarrell Cobb	Partner School Budget Strategy
Sonya Dobbs	Director of Exceptional Education School Support
Ryan Latimer	Director Boundary Planning and Enrollment
Shawn Lawrence	Deputy Chief of Schools
Casey Megow	Executive Director Facility Maintenance and Construction
Maggie Proffitt	Coordinator English Language Learners
Sudhir Sinha	Coach Data
Ken Stark	Executive Director Operations
KC Winfrey	Executive Director of Schools

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	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 amended application, its analysis was presented to the MNPS Board of Education on June 10, 2025. At the June 10, 2025 board meeting, the MNPS Board of Education voted to deny the amended application of The Rock Academy.

Commission Review Committee's Evaluation of the Application

Following the denial of The Rock Academy 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 Rock Academy amended application. This committee consisted of the following individuals:

Name	Title
Erin Conley	External Consultant
Beth Figueroa	Commission Staff
Rebecca Ledebuhr	Commission Staff
Maggie Lund	Commission Staff
Kristina McInerney	External Consultant
Mark Modrcin	External Consultant

The Commission's Review Committee conducted an initial review and scoring of The Rock Academy 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 Rock Academy 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 The Rock Academy because the application presents a robust academic plan tailored to reengage disconnected youth, a strong operational capacity with an experienced leadership team, a sound financial plan with secured philanthropic funding, and a demonstrated ability to garner significant community support.

The academic plan presented by The Rock Academy meets or exceeds the standard by effectively addressing a critical need in the community, including reengaging chronically absent youth. The application outlines an innovative model centered on comprehensive student support, including consistent one-on-one mentorship and a flexible, student-paced curriculum using the Modern Classroom Project approach. The academic plan features a later school-start time and a holistic support system to address the unique needs of this population, from health and wellness to housing and food. The applicant's vision is a comprehensive solution to the widespread issue of chronic absenteeism in Davidson County, fostering a sense of belonging and providing career-aligned pathways to ensure students remain engaged. The applicant also

provided clear, mission-aligned goals and a robust data tracking system to monitor student success and progress, including formative and summative assessments as well as attendance and culture data.

The applicant's operations plan also meets or exceeds the standard as the governing board is knowledgeable and experienced, and the proposed executive director has a proven track record of working with disengaged youth. The plan includes a proactive and a more immediate solution for a permanent facility, with top contenders already identified. This could eliminate the need for a later relocation, a notable strength of the plan. The transportation plan is also strong, utilizing public transit and exploring smaller buses to remove a key barrier to attendance. The applicant demonstrated a clear understanding of the staffing needs for this unique model, including the need for full-time mentors and specific leadership positions to support teachers. Their plan to start with a single grade level in the first year will allow them to focus their recruitment efforts effectively as they build a strong foundation.

The financial plan meets or exceeds the standard with a sound budget and a board that has demonstrated strong financial capacity. The proposed budget aligns with the school's programmatic details and staffing, with reasonable assumptions for start-up costs. While the model relies on significant annual philanthropic funding, the applicant has already secured a substantial portion of their first two-year goal, showcasing a proven ability to raise funds. The board demonstrated a deep understanding of the Tennessee Investment in Student Achievement ("TISA") formula and its potential impact on per-pupil funding. They also outlined clear contingency plans should anticipated funding not materialize, such as delaying specific roles or engaging external partners. This demonstrates the leadership's understanding of the financial focus required for this expensive academic model, providing the committee with confidence in their ability to manage the financial health of the organization.

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 Rock Academy amended application, please see **Exhibit A** for the complete Review Committee Recommendation Report, which is fully incorporated herein by reference.

Public Hearing

Pursuant to statute⁵ and Commission Policy 2.000, a public hearing chaired by the Commission's Executive Director was held on August 8, 2025. Representatives from MNPS at the

⁵ T.C.A. § 49-13-108.

public hearing focused on detailing the district's process and the findings of the MNPS Review Committee. MNPS explained that its amended application review process included full-day group work sessions for review and consensus of each application. The district then indicated that The Rock Academy's amended application was denied based on deficiencies found across the academic, operations, and financial plans. The district's review team raised concerns that the school's recruitment strategy lacked a targeted approach for at-risk students. The district also stated that the mastery-based learning model was not a proven method for educating chronically absent students and that academic supports, including those for English learners and students with disabilities, were insufficient. MNPS noted lack of dedicated space for career technical education ("CTE") and physical education within the facility plan and that the plan to use only two buses for a district-wide enrollment was deemed insufficient, especially given the late start time which would place students in peak traffic. Furthermore, the district's review team found significant financial concerns, citing a projected deficit in the first two years of operation without any adjustments to revenue assumptions, with a downward trend in a limited positive balance by Year 5.

In the sponsor's opening statement, the school's founder and proposed executive director emphasized that The Rock Academy is designed to serve a student population, referred to as opportunity students, who are currently unserved by existing models. The Rock highlighted that while the model's individual components may not be revolutionary, their combination and consistent application with care makes it a transformative approach. He noted that a staggering number of students in Nashville drop out each year, and the school is designed specifically for these individuals to give them a sense of belonging, flexibility in their learning, and relevance through career-aligned pathways. The Rock provided supporting data on the urgent need for the school, noting that approximately 6,500 Nashville high school students (33.6%) are chronically absent, and that chronic absenteeism in ninth grade makes students 30% less likely to graduate on time. He also pointed out that existing programs like alternative learning centers ("ALCs") and Simon Youth Academies serve less than 1% of the student population and are not an option for most chronically absent students. The founder concluded by reiterating his personal and professional commitment to this work, sharing his personal experience.

During questioning by the Commission, representatives from MNPS were asked to clarify how the district ensured a thorough review of the amended application within a compressed timeline, and how a consensus was reached when some individual rubrics had unscored sections. MNPS explained that the charter office dedicated a full day to the review of each application to ensure a thorough process. The review team consisted of experts who focused on their specific areas, and a thorough discussion of each section occurred in a consensus meeting. A district representative stated that MNPS already has comprehensive supports in place for

chronically absent students through existing programs, such as alternative learning centers and the MNPS Virtual School, and that The Rock Academy's approach was not adequately differentiated or proven for this specific student population. The district also noted that its application process is designed to be fair, transparent, and consistent across all applications, with the goal of approving only the most high-quality candidates.

The Commission then questioned the sponsor, with questions centered on the specific, innovative strategies to address chronic absenteeism, contingency plans for under-enrollment, and confirmed partnerships for CTE pathways. The applicant explained that the school's unique approach is a combination of proven practices, such as the Modern Classrooms approach, that together create a cohesive and supportive environment designed specifically for disengaged youth. The Rock also provided updates on facility and philanthropic funding, noting the school had secured over \$1.7 million in committed funding and identified top contenders for a school site, expressing confidence in their ability to continue raising money. When pressed by the Executive Director regarding the transportation plan and its adequacy given the two-bus budget and a large recruitment area, the applicant acknowledged that the team spent a significant amount of time on the transportation plan and that their approach is grounded in the values and feedback of the community. The Rock added that the later 9:30 a.m. start time makes it more feasible for students to use city buses, and that a preferred facility would be located directly on a bus line. The Rock also stated that the school is exploring smaller buses for more efficient routes and is prepared to add a third bus if necessary, underscoring that the school will support students overcoming any transportation challenges.

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 The Rock Academy. The Commission also accepted written comments, and the Commission received 243 written comments, with nine writing in support of MNPS and 234 writing in support of The Rock Academy.

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 whether approval of the application is in the best interests of the students, LEA, or community.⁶ 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

⁶ T.C.A. § 49-13-108.

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 Rock Academy amended application did rise to the level of meeting or exceeding the standards required for approval and approval would be in the best interests of the students, LEA, or community. As such, I recommend approval of the amended application for The Rock Academy.

The concept of an opportunity public charter school is new to the State of Tennessee and emphasizes the General Assembly's belief that the state should provide more targeted charter school options to students who are defined as "at-risk". However, given that any sponsor approved to open this type of charter school will be a trailblazer, there is an inherent increased risk that any authorizer would be agreeing to by approving such an application. Opportunity public charter schools are required to serve a very specific type of student population, such as students who have been previously retained, who are chronically absent, or who are in foster care. Any sponsor proposing to open this type of charter school needs to demonstrate a significant understanding of the population it intends to serve, and an understanding of the challenges involved in implementing the new model. Any authorizer considering the approval of an opportunity public charter school must understand that it will be required to work closely with the sponsor to execute the first-of-its-kind charter school in the state.

Despite these risk factors, authorizers should not be deterred from giving full consideration to an application proposing an innovative academic plan in accordance with state law. While I acknowledge that MNPS offers a variety of options for students including the Academies of Nashville and the Simon Youth Academies, I know that few, if any, specialized schools exist to target at-risk students in the beginning of high school and support them throughout their academic experience. My recommendation reflects the standards set forth in statute for the Commission: that only the highest quality schools are authorized. I believe that The Rock Academy's amended application meets the standard for approval and the school is poised to be a successful opportunity public charter school.

The Rock Academy has presented a strong academic plan to support at-risk students who are currently not well served in traditional educational environments. The sponsor proposes an innovative model to address students who show a "significantly increased risk of dropping out of high school and diminished long-term life outcomes." One of the strengths of the applications is

the intentionality with which The Rock Academy selected its desired population of students. The sponsor intends to focus on students who are chronically absent and/or are foster-involved, both defined as at-risk under statute. Because the sponsor has a focused student population, The Rock Academy tailored its academic plan and model to address the needs of those students. The sponsor proposes a later start time and a variety of supports to address the social-emotional needs of its student population. The amended application demonstrated intensive research into trends of the targeted demographics as well as needs of the community. The research resulted in an academic plan which utilizes the Modern Classroom approach and includes one-on-one mentorship. The sponsor included thorough assessments that ensure their academic model remains aligned to Tennessee standards.

The sponsor also showed tremendous community support and demand for the proposed school. The support from the community, industry professionals, and external stakeholders will be necessary to the successful implementation of its desired model. As with any new start charter school, recruitment of students is a top priority and challenge upon approval. Given the specific statutory requirements for students to qualify to attend the proposed school, recruitment of students will have to remain a focus if the school is to be successful. Additionally, the school will need to continue to refine its transportation plan as students enroll to ensure all students can easily get to school. Given the school's plan to start with only ninth grade and eighty-eight students, the school can focus on its operationalization.

The Rock Academy demonstrated a diverse and engaged governing board with expertise that will be critical to the early success of the school. In both the capacity interview and the public hearing, the governing board showed deep knowledge of the proposed model and answered questions regarding the financial plans for the school. Additionally, the proposed executive director is uniquely equipped to lead a school with this innovative approach. His professional and personal experience will be integral to the success of The Rock Academy and its implementation of the Whole Child Design. The executive director has spent extensive time meeting with community groups that serve the targeted student population and has engaged nationally with other schools offering similar approaches.

The sponsor has also developed a realistic facility plan, including feasible contingencies should the need arise. Historical evidence shows the need for a strong facility plan to contribute to a successful public charter school opening. The Rock Academy has not only identified an incubator site for the initial five years, but that same site has the capacity to serve as the location for the entire charter term should a long-term facility not become available. Moreover, The Rock Academy's smaller student population of eighty-eight students makes this facility plan feasible. Additionally, its small size has given The Rock Academy the ability to curate a professional development plan that is tailored to the unique needs of its academic model. This plan will be

beneficial as it works to attract and retain teachers to this unique model against the background of the national teaching shortage. The sponsor provided clarity during the capacity interview that gives me confidence that they are prepared to face challenges and implement contingencies where needed for the successful operation of this school.

Finally, I agree that the financial plan meets the standard for approval. As the opportunity public charter school model is new, it is imperative for the sponsor to understand and plan for financial contingencies. Using a conservative but realistic five-year budget, the sponsor has worked and secured \$1.7 million of its initial \$1.9 million goal to fund the first two years of The Rock Academy. Most important to its financial success, the sponsor has taken the time to understand deeply the Tennessee per-pupil funding model. While there are plenty of unknown variables regarding future funding, the board demonstrated a deep understanding of the financial realities of the school, clear contingency plans, and the ability to secure philanthropic grants. This expertise will be invaluable to the school's ultimate success.

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. While I acknowledge the risks involved with authorizing an opportunity public charter school, I also see the potential of creating a school environment to serve students who may not otherwise finish high school and successfully launch into a career or postsecondary education. The thoroughness and thoughtfulness of The Rock's plan gives me great confidence that approving this school will provide a high-quality charter school option for students in Nashville.

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

CONCLUSION

For these reasons, and for the reasons stated in the Review Committee Recommendation Report attached hereto as **Exhibit A**, I do believe that the decision to deny the amended application for The Rock Academy 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 The Rock Academy.



Tess Stovall, Executive Director
Tennessee Public Charter School Commission

August 27, 2025

Date



EXHIBIT A:
Charter Application Review Committee Recommendation Report

August 27, 2025

School Name: The Rock Academy

Sponsor: The Rock Academy of Nashville

Proposed Location of School: Metro Nashville Public Schools

Evaluation Team:

- Erin Conley
- Beth Figueroa
- Rebecca Ledebuhr
- Maggie Lund
- Kristina McInerney
- Mark Modrcin



This recommendation report is based on a template from the National Association of Charter School Authorizers.



© 2014 National Association of Charter School Authorizers (NACSA)

This document carries a Creative Commons license, which permits noncommercial re-use of content when proper attribution is provided. This means you are free to copy, display and distribute this work, or include content from the application in derivative works, under the following conditions:

Attribution You must clearly attribute the work to the National Association of Charter School Authorizers and provide a link back to the publication at <http://www.qualitycharters.org/>.

Noncommercial You may not use this work for commercial purposes, including but not limited to any type of work for hire, without explicit prior permission from NACSA.

Share Alike If you alter, transform, or build upon this work, you may distribute the resulting work only under a license identical to this one.

For the full legal code of this Creative Commons license, please visit www.creativecommons.org. If you have any questions about citing or reusing NACSA content, please contact us.

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,¹ 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. **Evaluation of the Proposal:** 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

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

three sections of the application: Academic Plan and Design, Operations Plan and Capacity, and Financial Plan and Capacity.

2. **Capacity Interview:** 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. **Consensus Judgment:** 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. **Summary of the Application:** A brief description of the applicant's proposed academic, operations, and financial plans.
2. **Summary of the Recommendation:** A brief summary of the overall recommendation for the application.
3. **Analysis of each section of the application:** 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 goals; academic focus and performance standards; assessments; school calendar and schedule; recruitment and enrollment; parent and community engagement and support; school culture and discipline; special populations; and the capacity to implement the proposed plan.
 - b. **Operations Plan and Capacity:** governance; facilities; start-up plan; personnel/human capital; professional development; transportation; additional operations; and the capacity to implement the proposed plan.
 - c. **Financial Plan and Capacity:** planning and budget worksheet; operating budget; operating budget narrative; and the capacity to implement the proposed plan.

The Commission's charter application Review Committee utilized the Tennessee Department of Education's Charter Creation Application Evaluation Guidance and Review Tool ("the rubric"), which is used by all local boards of education 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.”²

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

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

² Tennessee State Board of Education Policy 6.111

Summary of the Application

School Name: The Rock Academy

Sponsor: The Rock Academy of Nashville

Proposed Location of School: Metro Nashville Public Schools

Mission: The mission of Rock Academy is to reengage disconnected youth to ensure that they succeed in the postsecondary pathway of their choice. We envision a world where all young people have the power to shape their own futures.³

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

Proposed Enrollment:⁴

Grade Level	Year 1: 2026-2027	Year 2: 2027-2028	Year 3: 2028-2029	Year 4: 2029-2030	Year 5: 2030-2031	At Capacity:
9	88	88	88	88	88	88
10	0	85	85	85	85	85
11	0	0	82	82	82	82
12	0	0	0	78	78	78
Totals	88	173	255	333	333	333

Brief Description of the Application

The sponsor, The Rock Academy of Nashville, is proposing to open a charter school in Davidson County, Tennessee and serve students in ninth through twelfth grade when fully built out. The school, The Rock Academy ("The Rock"), is a new-start opportunity public charter school and would be the first school for the sponsor. The school intends to operate in central Nashville and serve students across the city to "re-engage disconnected youth to ensure that they succeed in the post-secondary pathway of their choice."⁵ The school proposes to offer an opportunity for students who have been identified as chronically absent and have struggled in a traditional school setting to receive comprehensive support to ensure they can complete high school.

The proposed school will be comprised of a diverse governing board that holds a deep commitment to realizing the unique and critical mission of the school and who collectively

³ The Rock Amended Application, pg. 10

⁴ The Rock Amended Application, pg. 85

⁵ The Rock Amended Application, pg. 10



possess experience in academics, social services, and community engagement. In Year 0, The Rock has budgeted \$1,900,000 in revenue, receiving \$1,400,000 in philanthropy and \$500,000 from the Charter School Program ("CSP") start-up grant, and projects \$1,099,700 in expenses for the school. The Rock projects the school will have \$2,781,531 in total revenue and \$3,200,223 in total expenses in Year 1, resulting in a balance of \$381,637. By Year 5, the school projects to have \$7,073,526 in total revenue and \$6,853,375 in total expenses, resulting in a positive ending fund balance of \$912,856.⁶ The school anticipates that more than 75% of the student population will qualify as economically disadvantaged, 25% of the student population will be students with disabilities, and, 29% of the student population will be English learners.⁷

⁶ The Rock Amended Application, pg. 436

⁷ The Rock Amended Application, pg. 85

Summary of the Evaluation

The Review Committee recommends the approval of the amended application for The Rock Academy because the academic, operations, and financial sections of the application meet or exceed the standard. The applicant demonstrates a clear understanding of the community's needs as it relates to the opportunity public charter school model, strong support, and a robust academic plan. The Rock's experienced board and sound organizational practices, along with a proven ability to secure funding, demonstrates the school's capacity to serve an underserved student population in Nashville.

The Rock's academic plan for an opportunity public charter school targets to reengage chronically absent students by offering personalized, whole-child support. The plan addresses the widespread issue of chronic absenteeism in Davidson County through a later start time, a flexible curriculum using the Modern Classroom approach, and intensive, one-on-one mentorship. To ensure success, the plan includes a robust assessment system with mission-aligned goals and a clear strategy for serving special populations. The applicant also provided numerous letters of support and partnerships, demonstrating strong community demand and a clear process for identifying and enrolling at-risk youth.

The applicant's operations plan includes a governing board with diverse and relevant experience, including legal, academic, and community engagement, as well as an experienced proposed executive director. The leadership team and board are well-versed in the challenges of operating a school for this specific population, demonstrating a strong passion and understanding for serving disengaged and foster youth. The Rock also outlined a strong start-up plan, provided detailed updates on facility acquisition, and shared a robust professional development plan. The application outlines the staffing positions necessary in relation to the projected enrollment, including full-time mentors and specific leadership roles. The applicant also provided specific contingency plans during the capacity interview should recruiting and retaining teachers or meeting enrollment targets become challenging.

The outlined financial plan includes a sound budget and is supported by strong financial oversight from the governing board. The applicant has already secured significant philanthropic funding for the next two years of operation and has clear plans to continue this work. The budget includes reasonable assumptions, along with adjusted Tennessee Investment in Student Achievement ("TISA") calculations for future years. Acknowledging the expense of operating the proposed school model, the applicant is committed to acquiring ongoing philanthropic support to ensure financial viability, particularly during the early operating years.

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 the Standard

Strengths Identified by the Committee

The Rock Academy's Academic Plan and Design meets or exceeds the standards because the applicant has provided a detailed academic plan with an innovative focus on reengaging disconnected youth in Nashville. The proposal effectively addresses a clear need within the community by offering students comprehensive support through consistent mentorship, the Modern Classroom Project approach, and an adjusted school start time. The school's mission-aligned goals and data tracking systems, along with a clear strategy for serving special student populations, further strengthen the application.

The application for The Rock Academy outlines a strong mission, vision, and academic plan that aligns with its intent to serve disengaged youth. The Rock's approach is designed to re-engage youth by fostering a sense of belonging and support within the school community, providing flexibility in how students progress through course content, and ensuring relevance through career-aligned pathways. The model features a later start time of 9:30 a.m., which the application highlights as being more developmentally appropriate for high schoolers. A whole-child support system is also integral, with resources for health and wellness, social-emotional learning, housing, and food to address students' unique needs. The proposed executive director emphasized in the capacity interview that a core element of the model is an intensive one-on-one academic support system for students. This is provided by consistent mentors who follow students through each grade level, working alongside teachers who differentiate instruction through the Modern Classroom approach to meet students where they are. Within both the application and the capacity interview, the sponsor provided significant detail on how the academic model would operate, including the blended learning and one-on-one support for students, and these details demonstrated a clear academic plan for the school.

The applicant outlined strong mission-aligned goals within the application that directly address not only the success of the academic model but also the specific population the school intends to serve. The Rock provided targeted goals, backed by national research and local data, that will allow the school to track the success of its model each year and over time. The application also details a robust data tracking system that includes not only formative and summative assessments but also attendance and culture data to better support students and their experience at the school. With this data tracking system and comprehensive support model, the applicant also has a clear plan to serve special populations of students.

A strength of the application is its clear demonstration of community support and documented demand. The application includes over seventy-five letters of support and



established memoranda of understanding (“MOUs”) with multiple community partners, including the juvenile court system and various community organizations. These partnerships are crucial for identifying at-risk youth and assisting with student recruitment to meet the statutory requirement that 75% of the student body be at-risk at time of enrollment. The targeted student population is particularly challenging, as many of these youth have had negative experiences in traditional school settings or face life circumstances that have contributed to their disengagement. To address this, the applicant outlined a clear process for identifying disengaged youth and defined roles and responsibilities on the team for student identification and recruitment. Moreover, the applicant’s plan to start with a small, targeted enrollment of eighty-eight students in ninth grade allows the school to ensure that adequate support can be provided to these students and to maintain the integrity of the model as the school grows. Additionally, the smaller enrollment projection gives the school a higher probability of achieving its enrollment needs in its first year.

Analysis of the Operations Plan and Capacity

Rating: Meets or Exceeds Standard

Strengths Identified by the Committee

The applicant's Operational Plan and Capacity meets or exceeds the standard because the applicant has a governing board with diverse and relevant experience, an experienced proposed executive director, a strong start-up plan, a clear facility plan, and a robust professional development structure.

The governing board for the proposed school is knowledgeable and has diverse experience, including legal, academic, and community engagement. The proposed executive director has dedicated his career to working with disengaged and foster youth and has proven experience in charter school leadership. During the capacity interview, both the board and the proposed executive director demonstrated a strong passion and understanding for serving the student population and the necessary experience to do so. Additionally, the executive director and board were able to provide significant detail within the interview around both operational and financial contingencies, further bolstering the demonstrated capacity of the proposed school team.

The Rock Academy has a strong, proactive plan for its facilities as detailed in the application and clarified during the interview. The Rock's initial application outlined a plan to operate from an incubation site for the first five years before moving to a permanent location. However, information shared during the capacity interview presented a more immediate solution. The Rock has assembled a dedicated facilities team of internal and external experts who have already identified top contenders for a permanent site. During the interview, a board member clarified that the top two site options are large enough to support the school at full capacity. This could eliminate the need for a future relocation, which was a noted strength from the initial plan. The board member also shared that one of the top contenders was originally built to be a school, and architects are scheduled to conduct a feasibility analysis on this site soon.

Given the widespread targeted area for recruitment, the transportation plan is designed to remove a primary barrier to attendance for the target population. During the capacity interview, the proposed executive director explained that the school's later start time of 9:30 a.m. makes public transportation more viable for students, a point reinforced by the fact that the preferred facility has a city bus stop directly in front of it. Demonstrating a clear understanding of the importance of transportation for their model, The Rock Academy clarified that they are exploring smaller buses for more efficient routes and are ready to add a third bus

if necessary, underscoring their commitment to ensuring every student arrives at school on time.

The Rock Academy outlined a robust professional development plan that focuses on the uniqueness of the model and the appropriate service of the intended population. The application also details the number of staff necessary to implement the model, including full-time mentors working directly with students and leadership positions directly supporting teachers. During the capacity interview, the committee questioned the applicant about their teacher recruitment and retention plan, given the specific needs for effective execution of the model and the demanding teacher schedule. The applicant outlined interest already received from prospective teachers and leaders who want to serve this specific population and clarified how the uniqueness of this population and model requires significant staff to prevent burnout and ensure success. The applicant's plan to start with only one grade level in their first year is a key strength, as it allows them to narrow their staff recruitment focus as they get established.

Analysis of the Financial Plan and Capacity

Rating: Meets or Exceeds the Standard

Strengths Identified by the Committee

The applicant's Financial Plan and Capacity meets or exceeds the standard because the applicant presents a sound budget supported by secured philanthropic funding, has identified contingency plans, and has a board that demonstrates strong financial capacity and a proven ability to secure necessary funds.

The proposed budget aligns with the programmatic details and staffing described in the application, providing reasonable assumptions for start-up expenses and a complete five-year financial plan. While the budget relies on securing significant philanthropic dollars annually to maintain the academic model, the board and leadership team effectively outlined the sources of this support and their dedication to future partnerships and development during the capacity interview. Notably, the applicant has already secured \$1.7 million of the \$1.9 million goal for the first two years from the Charter School Program ("CSP") grant, the Nashville Incubator, and New Schools Venture Fund, demonstrating a strong ability to secure philanthropic funding. Further, the applicant described their due diligence on future TISA funding and the potential impacts of their population related to per-pupil funding. The applicant's strategy to address several unknown funding variables as the state's first opportunity school includes a strong commitment to advocacy and securing additional philanthropy to ensure the model's success. In the capacity interview, the board demonstrated its financial oversight role by explaining that their due diligence involved a budget projection based on expenses first. This process, which helped the school understand the revenue needed for the high-needs student population, provided the committee with confidence that the leadership and board understand the financial focus required for this expensive academic model.

The Rock's governing board has a clear plan and structures in place to manage and monitor the financial health of the organization and demonstrated this expertise during the capacity interview. In the interview, the board outlined contingency plans should anticipated funding not materialize, such as delaying specific roles or engaging external partners to fulfill certain responsibilities. When the committee questioned the number of staff relative to student enrollment, the applicant clearly explained the rationale for the staffing model, highlighting its necessity for serving this student population. The applicant also noted that The Rock budgeted conservatively for facilities and capital improvements, and with philanthropy already secured for the facility, they are in a strong position to move forward. While ongoing philanthropy is needed to sustain this expensive program, the applicant demonstrated a strong understanding of the model's needs and the commitment and ability to raise the necessary funds.



Evaluation Team

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 of 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.

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.

Maggie Lund is the Deputy Director of Authorizing at the Tennessee Public Charter School Commission. Additionally, she serves as an adjunct professor in the Lipscomb College of Education Master's Program, teaching Planning, Instruction, and Assessment and Building Classroom Communities. Prior to her role at the Charter Commission, Maggie served as a school administrator at a Nashville public charter school. Maggie was a Teach for America corps member and served as an 8th grade teacher in a charter school for four years. Maggie holds a B.A. in Business Administration and Marketing from Loyola University New Orleans, a Doctor of Education degree, and a Master of Education degree with a specialization in English Language Learning from Lipscomb University. Her dissertation research focused on Restorative Justice



Practices and school culture. Most recently, her research article, *Mindsets Matter for Equitable Discipline* was published in the *Middle School Journal*.

Kristina McInerney is a special education teacher with seven years of experience. She earned her bachelor's degree in K-12 multi-categorical special education, with a minor in Spanish, from Coastal Carolina University. Kristina also holds a master's degree in educational leadership from Carson Newman University. Throughout her career, she has been dedicated to supporting students with diverse learning needs, drawing on her expertise in special education and her leadership training to foster inclusive and effective learning environments.

Mark Modrcin currently serves as the Director of Growth and Governance for Vertex Education, which supports public charter schools in Arizona, Nevada and Texas that serve nearly 29,000 students. In this role, he leads the organization's new state growth efforts and supports the boards of Legacy Traditional Schools. Previously, Mark served as the Director of Authorizing for the State Public Charter School Authority of Nevada, as well as a district authorizer in Tulsa, Oklahoma. Mark holds a Bachelor of Science degree in Business from Miami University, an MBA from the University of Tulsa, and is a 2015 alum of the National Association of Charter School Authorizers ("NACSA") Leaders Program.