



Executive Director's Recommendation Empowerment Academy Chattanooga 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 July 27, 2026, the sponsor of Empowerment Academy Chattanooga ("sponsor," "Empowerment," or "EAC") appealed the denial of its amended application by the Hamilton County Schools ("HCS") 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 Empowerment Academy Chattanooga amended application was not contrary to the best interests of the students, local education agency ("LEA"), or community.¹ Therefore, I recommend that the Commission uphold the decision of the Hamilton County Schools Board of Education to deny the amended application for EAC.

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 Empowerment Academy Chattanooga amended application. In accordance with the Tennessee State Board of Education's Charter School Application Scoring Rubric ("rubric"), for an application to be deemed ready for approval, the summary rating for each of the major sections must meet the standard. In addition, the Commission is required to hold a public hearing in the district where the proposed charter school seeks to locate.²

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 scoring rubric and that approval of the amended charter application is in the best interests of the students, local education agency, or community.³ If the local board of education's decision is overturned, then the Commission can approve the application, and thereby authorize the school, or can affirm the

¹ T.C.A. § 49-13-108.

² T.C.A. § 49-13-108.

³ T.C.A. § 49-13-108.

local board's decision to deny.

PROCEDURAL HISTORY

1. On December 3, 2026, the sponsor submitted a letter of intent to Hamilton County Schools expressing its intention to file a charter school application.
2. The sponsor submitted its initial application for Empowerment Academy Chattanooga to HCS on February 1, 2026.
3. HCS assembled a review committee to review and score the Empowerment Academy Chattanooga initial application.
4. The HCS Review Committee reviewed and scored the Empowerment Academy Chattanooga initial application, indicating the academic focus and plan are unclear and does not provide a cohesive school model, it is unclear if the founding team has the proposed capacity to found and oversee a charter school and most operational subsections in the operations plan lack detail, the budget does not align with the narrative presented, and the addenda are underdeveloped and lack detail to present a clear picture of the network. For these reasons, the HCS Review Committee rated all sections as does not meet the standard.
5. On March 24, 2026, the HCS Review Committee conducted a capacity interview with representatives of Empowerment Academy Chattanooga.
6. On April 16, 2026, the HCS Board of Education voted to deny the Empowerment Academy Chattanooga initial application.
7. The sponsor amended and resubmitted its application for Empowerment Academy Chattanooga to HCS on May 18, 2026.
8. The HCS Review Committee reviewed and scored the Empowerment Academy Chattanooga amended application based on the scoring rubric and rated the academic section as partially meets the standard, and the operations, finance and addenda sections as does not meet the standard.
9. On July 16, 2026, the HCS Board of Education voted to deny the amended application of Empowerment Academy Chattanooga.
10. The sponsor appealed the denial of the Empowerment Academy Chattanooga amended application in writing to the Commission on July 27, 2026, including submission of all required documents per Commission Policy 2.000.
11. The Commission's Review Committee independently analyzed and scored the Empowerment Academy Chattanooga amended application using the state's scoring

rubric.

12. On September 3, 2026, the Commission staff held a public hearing at Hamilton County Schools in Chattanooga, Tennessee. At the public hearing, the Executive Director, sitting as the Commission's designee, heard presentations from the sponsor and HCS, and received public comment regarding the Empowerment Academy Chattanooga amended application.
13. The Commission's Review Committee conducted a capacity interview with key members of the Empowerment Academy Chattanooga leadership team on September 11, 2026, via Microsoft Teams.
14. After the capacity interview, the Commission's Review Committee determined a final consensus rating of the Empowerment Academy Chattanooga 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 HCS, 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 HCS to review and score the Empowerment Academy Chattanooga initial application consisted of the following individuals:

Name	Title
Robin Bambrly	HCS Teaching and Learning
Candice Belt	HCS Finance
Jim Boles	HCS School Choice
Michelle Doane	External Reviewer
Michelle Eargle	HCS Ex Ed
Tim Harper	HCS Operations
Fannie Moore	HCS Charter School Coordinator
Kim Myers	HCS Pre-K
Neelie Parker	HCS Opportunity and Access
Cait Steward	HCS Community Impact & Partnership
John Thomas	HCS Federal Programs



Name	Title
Diego Trujillo	HCS ESL

The Empowerment Academy Chattanooga initial application received the following ratings from the HCS Review Committee:

Sections	Ratings
Educational Program Design and Capacity	Does Not Meet Standard
Operations Plan and Capacity	Does Not Meet Standard
Budget and Finance	Does Not Meet Standard
Addenda	Does Not Meet Standard

After the HCS Review Committee completed its review and scoring of the initial application, its analysis was presented to the HCS Board of Education on April 16, 2026. The HCS Board of Education voted to deny the initial application of Empowerment Academy Chattanooga.

District Denial of Amended Application

The Review Committee assembled by HCS to review and score the Empowerment Academy Chattanooga amended application consisted of the following individuals:

Name	Title
Robin Bambry	HCS Teaching and Learning
Candice Belt	HCS Finance
Jim Boles	HCS School Choice
Michelle Doane	External Reviewer
Michelle Eargle	HCS Ex Ed
Tim Harper	HCS Operations
Fannie Moore	HCS Charter School Coordinator
Kim Myers	HCS Pre-K
Cait Steward	HCS Community Impact & Partnership
John Thomas	HCS Federal Programs
Diego Trujillo	HCS ESL

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

Sections	Ratings
Educational Program Design and Capacity	Partially Meets Standard
Operations Plan and Capacity	Does Not Meet Standard

Sections	Ratings
Budget and Finance	Does Not Meet Standard
Addendum B	Partially Meets Standard
Addendum D	Does Not Meet Standard

After the HCS Review Committee completed its review and scoring of the amended application, its analysis was presented to the HCS Board of Education on July 16, 2026. At the July 16, 2026, board meeting, the HCS Board of Education voted to deny the amended application of Empowerment Academy Chattanooga.

Commission Review Committee's Evaluation of the Application

Following the denial of the Empowerment Academy Chattanooga 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 Empowerment Academy Chattanooga amended application. This Review Committee consisted of the following individuals:

Name	Title
Erin Conley	External Consultant
Lizzie Eisen	External Consultant
Beth Elpers	Commission Staff
Sophie Binenfeld Gilmore	Commission Staff
Pam Lehman	Commission Staff
Nathan Parker	External Consultant
Jeff Wasbes	External Consultant

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

Sections	Ratings
Educational Program Design and Capacity	Does Not Meet Standard
Operations Plan and Capacity	Does Not Meet Standard
Budget and Finance	Does Not Meet Standard
Addenda	Does Not Meet Standard

The Review Committee recommends the denial of the amended application for Empowerment Academy Chattanooga because the applicant failed to provide sufficient evidence

in the academic, operational, financial, and addenda sections to demonstrate the application meets the required criteria of the rubric.

The applicant's Educational Program Design and Capacity does not meet the standard because the application presented underdeveloped academic structures, significant ambiguities regarding students with disabilities and English learners, and a critical lack of verifiable, Chattanooga-specific evidence of community demand. Per the scoring rubric, an application must present a comprehensive, cohesive, and sound educational program supported by a clear day-to-day instructional methodology. In contrast, the academic plan fails to articulate how a single teacher will simultaneously execute distinct grade-level curricula within multi-grade classroom bands (such as combining K-1, 2-3, and 4-5). This deficiency was further exposed during the capacity interview, when leadership offered conflicting explanations about how instructional assistants would independently lead grade-level content, which does not meet the standard for instructional quality and academic rigor. Furthermore, the design lacks a clear integration of the proposed agriculture with science, technology, engineering, and mathematics ("STEM") model into daily instructional practice and fails to establish a sound assessment strategy or measurable goals. These foundational flaws are compounded by severe compliance deficiencies regarding special populations, including the lack of day-to-day operational details for meeting Individuals with Disabilities Education Act ("IDEA") mandates, misaligned staffing budgets, speculation about future funding, and unidentified vendors. Because the applicant failed to demonstrate authentic local demand, provide a viable multi-grade execution plan, or establish a compliant framework for students with disabilities and English learners, the educational program does not meet the standard.

The applicant's Operations Plan and Capacity does not meet the standard due to various deficiencies across governance, organizational structure, facility readiness, staffing pipelines, and executive leadership capacity. The governing board presented inconsistent and contradictory information regarding its roster, roles, and oversight responsibilities, struggling during the capacity interview to identify members or clarify titles, and relying heavily on a single individual. The governing board also could not explain how a multi-campus rollout across three dispersed markets (Chattanooga, Nashville, and Memphis) was evaluated as feasible. Additionally, the board failed to articulate a compliant process for selecting a statutory parent representative, exposing a direct conflict with the bylaws mandating a \$50,000 annual contribution for board participation. Operational lines of authority between the board, central network, and school sites are ambiguous, with critical executive roles like the chief executive officer ("CEO") and chief financial officer ("CFO") remaining vacant and contingent on future funding. These structural vulnerabilities are further exacerbated by incomplete facility agreements lacking verified timelines, Americans with Disabilities Act ("ADA") compliance due

diligence, or formal memoranda of understanding (“MOUs”), as well as an absence of a staffing pipeline for the specialized multi-grade model. Consequently, the operational plan fails to satisfy rubric indicators and lacks the foundational clarity required for authorization.

The applicant’s Budget and Finance section does not meet the standard due to major inconsistencies, unsupported financial assumptions, and a lack of internal financial capacity. The submitted operating budget relies heavily on unawarded federal Charter Schools Program (“CSP”) startup grant and features a critical, unsustainable dependence on informal, personal funding from the board president to cover operating shortfalls rather than a solvent financial model. Furthermore, the budget omits or substantially underfunds essential operational categories, such as food service, technology infrastructure, student assessments, and required special education and English learner staffing. The budget also holds salaries flat despite narrative commitments to competitive compensation and step increases. Internal financial capacity is similarly deficient: critical oversight roles such as the CFO remain vacant, back-office accounting services lack adequate budget allocation, and procurement policies and financial monitoring frameworks are incomplete. Because the budget contains material misalignments, fails to reconcile multi-campus cost allocations, and lacks the internal controls necessary to demonstrate fiscal solvency, the financial plan does not meet the standard.

The applicant’s addenda do not meet the standard due to a lack of demonstrated multi-school operating experience, an unsupported network financial model, an incomplete education service provider (“ESP”) addendum, and unverified network-level readiness. The organization possesses no prior track record of successfully launching or managing multiple charter schools. The proposal to simultaneously open three campuses across disparate markets demonstrates an unrealistic assessment of the operational complexity a multi-city launch entails. This lack of scaling capacity was underscored during the capacity interview, where representatives offered generalized assurances rather than actionable execution strategies. Moreover, the network budget contains material inconsistencies that fail to reconcile shared central-office allocations and compensation costs—with leadership admitting that network hiring timelines would be driven by contingent enrollment triggers rather than the submitted plan, rendering the model entirely unproven. Finally, Addendum C is severely underdeveloped, completely omitting a named ESP, draft management agreement, performance metrics, and a transparent selection process. Because the applicant failed to present a proven multi-school track record, a viable network budget, or complete third-party documentation, the addenda do not meet the standard for approval.

For the aforementioned reasons, the Review Committee found that the sponsor did not meet or exceed the standard for approval based on the Tennessee State Board of Education’s scoring rubric.

For additional information regarding the Review Committee’s evaluation of the Empowerment Academy Chattanooga amended application, please see **Exhibit A** for the complete Review Committee Recommendation Report, which is fully incorporated herein by reference.

Public Hearing

Pursuant to statute⁴ and Commission Policy 2.000, a public hearing chaired by the Executive Director was held on September 3, 2026. Representatives from Hamilton County Schools at the public hearing focused on the quality of the application review process, the support that was provided to the applicant throughout the review process, and the reasons for denial of the application. Representatives from Hamilton County Schools indicated that the Empowerment Academy Chattanooga amended application was denied due to academic plan deficiencies, governance constraints across a multi-school network model, and compounding fiscal unsustainability. During its presentation, Hamilton County Schools urged the Commission to uphold the local board's denial, framing the application as fundamentally unviable and underdeveloped. HCS outlined its review process, noting that the committee consisted of district staff and independent consultants who evaluated the initial and amended applications using the State Board of Education’s quality authorizing standards and rubric.

The district highlighted the academic plan deficiencies, including an undefined social studies curriculum, unmeasurable performance metrics, vague and contradictory multi-grade classroom groupings, and an unclear implementation plan for Response to Instruction and Intervention (“RTI²”). Furthermore, HCS noted that the proposed facility location in the 37405 zip code did not match the demographics described in the application, and the sponsor lacked a specific recruitment strategy for reaching the targeted population. Operationally, HCS overviewed insufficiencies regarding the network model's plan to open three schools simultaneously across different cities (Chattanooga, Nashville, and Memphis), concluding that the governing board lacked the capacity, structure, and experience necessary to oversee the schools' openings and operations. Financially, the district emphasized that the school's budget was unsound, relying heavily on an unawarded CSP grant without a viable contingency plan, while underestimating essential operating costs, such as omitting salary and benefit increases, and lacking MOUs for facility support.

In the sponsor’s opening statement, Empowerment countered the district's statements by presenting Empowerment Academy Chattanooga as a joint venture with the African Methodist Episcopal (“AME”) Church, created to ensure that historically underserved male scholars do not

⁴ T.C.A. § 49-13-108.

fall through the cracks. The sponsor explained that Hamilton County was chosen based on prior outreach and summer enrichment programs. The proposed school aims to address the low academic achievement among Black and economically disadvantaged male students through a holistic support system of male mentors and a STEM-with-agriculture curriculum. Addressing structural and operational strategy, Empowerment explained that capping initial enrollment at fifty students was a deliberate choice to enable a targeted approach, maintain financial stability without under-enrollment risks, and build close relationships with families. The founding team reported active community engagement, ongoing partnerships with local leaders and the AME Church. This is evidenced through the planned opening of community learning centers, secured physical space at Warren Chapel AME Church, and over \$164,000 raised through community and church fundraising efforts.

During questioning by the Commission, HCS was asked to elaborate on its review process, post-amended feedback, and financial evaluations. The district explained that the committee reviewed the amended application to confirm whether the school had addressed previously raised concerns and compiled an updated consensus rubric and report without conducting a second capacity interview. When questioned about specific academic findings, HCS noted that the application lacked approved curriculum documentation and contained contradictions regarding classroom schedules, such as concurrent scheduling for grade-level classes and RTI². Regarding board capacity, HCS reiterated that attempting to open three schools simultaneously stretched governance oversight beyond reasonable limits, and that financial models failed to provide sufficient evidence that the budget would balance or survive the loss of the CSP grant.

The Commission then questioned Empowerment regarding community demand, governance separation, financial solvency, and special education readiness. To address concerns about individuals serving as both staff members and governing board members, the sponsor clarified that individuals had formally resigned from the governing board to transition to network staff positions. Additionally, the sponsor introduced new board members alongside central office personnel. Regarding financial viability in light of the unawarded CSP grant, the leadership team outlined a revised funding structure combining mandatory \$50,000 contributions from board members, church capital donations, personal financial commitments from leadership of up to \$300,000, and additional revenue streams from upcoming community learning centers to secure a Year 1 break-even budget. The sponsor also explicitly clarified that Empowerment Academy operates strictly as a non-religious 501(c)(3) public charter school. Finally, addressing special education, the sponsor acknowledged initial challenges but emphasized that they have recruited experienced principals and licensed special populations personnel to ensure day-one compliance.

The public hearing concluded with closing statements by both parties and the receipt of

seven in-person comments, with zero speaking in support of HCS and seven speaking in support of Empowerment Academy Chattanooga. The Commission also accepted written comments, and the Commission received twenty-eight written comments in support of Empowerment Academy Chattanooga.

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 State Board of Education’s application-scoring rubric and,” whether “approval of the application is in the best interests of the students, LEA, or community.”⁵ 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 LEA, 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 Empowerment Academy Chattanooga amended application did not rise to the level of meeting or exceeding the standards required for approval.

Any sponsor that seeks to establish a charter school is entering this space with the primary purpose of educating children in Tennessee. The charter application provides a pathway for sponsors to explain their plans to provide a choice for families using innovative methods to “close achievement gaps” and “improve learning for all students.”⁶ To fully assess the sponsor’s capacity to fulfill the purpose of the Tennessee Public Charter Schools Act, local boards of education and, on an appeal, the Commission conducts a comprehensive review of the academic, operational, and financial plans as well as additional considerations for any related plans necessary to satisfy the plans set forth in the application. While the sponsor’s passion to open Empowerment Academy and desire to make a difference in male students’ lives is evident throughout the record, the amended application has significant gaps to close prior to it being ready for approval.

⁵ T.C.A. § 49-13-108.

⁶ T.C.A. § 49-13-102.

In review of the educational program design and capacity, I agree with the Review Committee that the application does not meet the standard for approval. While the educational plans for Empowerment Academy Chattanooga are guided by a unique mission to serve economically disadvantaged male students in a small educational setting, the proposed academic model remains underdeveloped. To meet the standard for approval, a sponsor must present a detailed, coherent, and comprehensive academic plan and describe how it is specifically suited to the needs of the proposed students. While the applicant demonstrated a clear passion for the proposed STEM-plus-agriculture academic plan, the application did not include a detailed plan for how this would be effectively integrated into the school. While I admire the sponsor's plan to emphasize agriculture as a tool for education, the application as written does not support the implementation of the model.

Additionally, the sponsor did not detail how the proposed mixed-age groupings would be implemented with fidelity and how teachers would effectively use the selected curriculum across multiple grades simultaneously. This gap was further exposed during the capacity interview, when leadership offered conflicting explanations about how instructional assistants would independently lead grade-level content, a practice that does not meet the standards for instructional quality and academic rigor. While I understand the applicant's desire to operate a small school, the plan also brings complexity with multi-grade grouping. This requires significant clarity from the beginning of the instructional, curriculum, and assessment plans, and this was lacking throughout the application and the appeal process. Application approvals result from a rigorous review process and require sponsors to detail not only their achievement goals but also the plans, processes, and mechanisms they will use to reach those goals.

The sponsor also highlighted that the driving force behind the application was a request from community members to address low proficiency scores. I agree with this need. However, overall, there was a lack of community demand contained within the application or the record. Both in the capacity interview and the public hearing, the sponsor indicated that the governing board is collaborating with the AME church. The sponsor stated that the governing board decided to pursue a charter school rather than a private school due to the funding model. Beyond the application's references to a 2025 summer enrichment program in Memphis, there is little additional evidence that demonstrates community demand for the school in Chattanooga. Throughout the appeal, the sponsor stated that it has maintained ongoing relationships with interested families, but these are not detailed in the application.

The sponsor lacks a solid plan to educate students with disabilities. The sponsor listed multiple methods for identifying students with disabilities but did not provide operational details on how those needs would be met to ensure compliance with IDEA. The sponsor also acknowledged that many of the potential students of Empowerment Academy would require

services. However, the outlined staffing plan, proposed school schedule, and corresponding budget do not support a comprehensive approach to serving students with disabilities. The sponsor also indicated that Empowerment Academy would contract with an external service provider for special education services. However, the application does not detail that plan, and I am unable to assess whether this school would be prepared on day one to serve every family who chose for their student to attend Empowerment Academy Chattanooga. For all reasons indicated, I cannot recommend this plan for approval.

Operationally, this application does not meet the standard for approval. Significant gaps exist in the governance plan. While it is normal for governing boards to evolve throughout the application process, ambiguity about the governing board remains. From review of the application to the capacity interview to the public hearing, the sponsor identified new and/or different individuals as members of the governing board. Some identified people were not introduced until the sponsor was questioned during the public hearing or by the Review Committee. The sponsor noted a shift in roles from the governing board member to hired network staff. This lack of detail is a critical concern as the governing board is the entity with which the Commission would hold a legal relationship. With ever-changing members, it becomes impossible to effectively assess the board's capacity to oversee school and/or network operations. There remains confusion around the roles for board members versus proposed network staff members. An unclear delineation of roles and responsibilities undermines the accountability and oversight that are necessary for high-quality charter schools.

There are also concerns around the conflicts of interest, actual or perceived, for the proposed governing board. The sponsor testified that each board member is required to contribute \$50,000 to the charter network, in accordance with the board bylaws. The attorney for the board indicated during the capacity interview that members would not vote or engage in discussion if they are affiliated with the church entities, as sites of the school facilities. But with each member having a financial stake in the school's success, all votes carry the potential for perceived conflicts of interest, at least. Additionally, the sponsor and its attorney showed a knowledge gap of the governance requirements, particularly regarding the parent representative serving on the board. The attorney indicated that the board's bylaws would be updated to remove the financial contribution requirement for the parent representative. However, as detailed below, there are significant implications to the decision to change what incoming funds are available to the school, both operationally and financially. For these reasons, I cannot recommend approval of this application.

While the sponsor named its permanent facility as Warren Chapel AME Church in Chattanooga, the application did not contain a proposed MOU to validate the testimony that the church would cover all lease and renovation costs. Further, the sponsor could not detail whether

the proposed facility was zoned properly for schools, what renovations would be necessary to make the facility ADA compliant, and timeline for making the facility student ready. While having clear use of a facility is a significant step for a proposed charter school, the lack of information contained within the application and in the appeal results in the inability to assess the facility plan.

Further, the sponsor did not provide sufficient evidence in support of its school staffing plan. The application lists leadership as the School Director, Children & Families Director, and Head of Schools as a member of the network staff. The sponsor also indicated that each school would have three lead teachers and would be supported by three instructional teaching assistants. However, this plan is not reflected in the budget provided. The sponsor's application does not describe how the school will recruit or retain teachers. Even with a school model serving a small student population, it is necessary to understand the sponsor's plan to ensure that high-quality teachers are hired to deliver on the academic model. As submitted, I cannot assess the viability of the sponsor's plan for teacher recruitment and retention. Important to the school's operations plan is clarity of the professional development for staff. The sponsor's application describes generic professional development concepts but fails to describe how that development would occur. The sponsor indicated that the proposed Head of Schools would provide ongoing instructional coaching. However, the application fails to detail the feasibility of this plan as the proposed Head of Schools is based in Memphis, and the funding for the intended touchpoints is not supported by the budget.

Financially, I agree with the Review Committee that the application does not meet the standard for approval. The school received notification that it was not awarded the CSP grant. As such, the school needed to demonstrate a contingency plan to address this gap in anticipated funding. However, the sponsor failed to provide sufficient evidence of a viable plan for sustainability without CSP grant funding. When questioned, the proposed board president verbally committed to personally providing the funding that was missing from the budget. I admire the board chair's show of commitment; however, a single funder's verbal pledge is not a plan for a proposed school. The pledge failed to detail whether this would be an annual commitment, the amount of the gift, whether this pledge was a contribution or a loan to the network that would have to be repaid, or any conditions tied to the pledge. Also, this funding commitment underscores the aforementioned conflict-of-interest concerns regarding the board's ability to remain impartial in making decisions about the school and its leadership.

Even with the CSP grant, the proposed budget does not meet the standard. The sponsor's budget was inconsistent across key line items necessary for a sustainable charter school. The sponsor did not detail how the school would budget for transportation services, food services, or professional development. There were significant discrepancies between the budget narrative

and template, which undercut the viability of the school's plan. When questioned about the budget, the sponsor testified that some of the budget amounts were entered at the instruction of the local boards of education or resulted from a lack of clarity from the local boards of education. Even if the sponsor's budget was based on misinformation, the financial plan for Empowerment Academy is underbudgeted. For example, the sponsor testified that the board would rely on member financial contributions to fund Year 0. The language of the bylaws indicates that there is a minimum of three board members for Empowerment Academy. Therefore, at its smallest iteration, the board would contribute \$150,000 to the school's budget, which is well below the projected Year 0 expense of \$226,756. Additionally, this application is one of three pending before this Commission. The sponsor in its contingency plan did not account for the possibility of fewer than three schools being approved. The sponsor's contingency plan does not provide evidence that it can sustain one school, even without consideration of the entire network currently pending appeal. For a school seeking to open with a small enrollment, all aspects of the application become critical. What may be a negligible variance for schools with larger enrollment has a greater impact on a model proposed by Empowerment Academy Chattanooga.

Finally, the addenda do not meet the standard for approval. There is no evidence within the record of the governing board's capacity or experience launching three charter schools at the same time in three distinct locations. While I appreciate the sponsor's efforts around the summer camps, launching charter schools is far more complex, and there is not demonstrated evidence of the governing board's ability to launch three schools successfully. The network budget presented did not align to the school-level budget, and there are significant gaps in evidence in how the network and school will remain financially viable. The section regarding the ESP was not fully completed, and the section contained insufficient evidence to evaluate the plan.

The sponsor is supporting a noble mission to support Tennessee male students. However, the application does not reflect a readiness to open in the academic, operations, financial plans and addenda. For these reasons, and consistent with the concerns previously identified, I cannot recommend 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.

For the reasons expounded on in this report, I recommend that the Commission deny the Empowerment Academy Chattanooga amended application.



CONCLUSION

For these reasons, and for the reasons stated in the Review Committee Recommendation Report attached hereto as **Exhibit A**, I do not believe that the decision to deny the amended application for Empowerment Academy Chattanooga was contrary to the best interests of the students, the LEA, or community. Therefore, I recommend that the Commission affirm the decision of the HCS Board of Education to deny the amended application for Empowerment Academy Chattanooga.

A handwritten signature in cursive script, reading "Tess Stovall". The signature is written in dark ink and is positioned above a horizontal line.

Tess Stovall, Executive Director
Tennessee Public Charter School Commission

October 8, 2026

Date



EXHIBIT A:
Charter Application Review Committee Recommendation Report

October 8, 2026

School Name: Empowerment Academy Chattanooga

Sponsor: Empowerment Academy

Proposed Location of School: Hamilton County Schools

Evaluation Team:

- Erin Conley
- Lizzie Eisen
- Beth Elpers
- Sophie Binenfeld Gilmore
- Pam Lehman
- Nathan Parker
- Jeff Wasbes



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,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](#).

four sections of the application: Educational Program Design and Capacity, Operations Plan and Capacity, Budget and Finance, and Addenda.

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 leadership 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, financial plans, and addenda.
2. **Summary of the Evaluation:** A brief summary of the overall recommendation for the application.
3. **Analysis of each section of the application:** An analysis of the major sections of the application and the capacity of the team to execute the plan as described in the application.
 - a. **Educational Program Design and Capacity:** school overview; school mission and model; anticipated student population; family and community engagement and support; school culture and discipline; curriculum and instruction; special populations; student assessment and evaluation; educational program capacity; and the capacity to implement the proposed plan.
 - b. **Operations Plan and Capacity:** governance; staffing; facilities; transportation; health and safety; insurance; food service; start-up plan; operations capacity; and the capacity to implement the proposed plan.
 - c. **Budget and Finance:** planning and budget worksheet; operating budget; budget and finance capacity; and the capacity to implement the proposed plan.
 - d. **Addenda:** (b) supplemental questions for sponsors proposing to open a new school that will create a network or as part of an existing network/CMO, (c) supplemental questions for sponsors contracting with a third-party ESP (including a CMO), (d) supplemental questions for sponsors seeking approval of multiple schools in this application cycle.

The Commission's charter application Review Committee utilized the Tennessee State Board of Education's Charter School Application Scoring Rubric ("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

Each individual question will be rated “Meets,” “Partially Meets,” or “Does Not Meet.” The rubric provides guidance within each question to aid reviewers in determining the extent to each response meets the standard. Each major subsection will then be assigned an overall rating of “Meets,” “Partially Meets,” or “Does Not Meet” by averaging the ratings for each individual question within the subsection. Section summaries will then be determined by averaging subsection ratings.³

² Tennessee State Board of Education Policy 6.111

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

Summary of the Application

School Name: Empowerment Academy Chattanooga

Sponsor: Empowerment Academy

Proposed Location of School: Hamilton County Schools

Mission: Empowerment Academy (“The Academy”) exists to support young boys from historically underserved communities through a small-school, relationship-centered model focused on early literacy, academic growth, leadership, and character development. Through personalized instruction, low student-to-teacher ratios, hands-on learning experiences, and consistent mentorship, scholars receive the individualized support needed to build confidence and achieve academic success. The Academy measures its impact through student literacy and math growth, mastery of Tennessee academic standards, attendance, family engagement, leadership development, and social-emotional growth, ensuring students are prepared to thrive in school and contribute positively to their communities.⁴

Number of Schools Currently in Operation by Sponsor: There are no schools currently in operation by the sponsor. The sponsor is proposing to open two additional schools during this application cycle for a total of three new schools: Memphis, Nashville, and Chattanooga.

Proposed Enrollment:⁵

Grade Level	Year 1: 2027-2028	Year 2: 2028-2029	Year 3: 2029-2030	Year 4: 2030-2031	Year 5: 2031-2032	At Capacity:
K	8	8	8	8	8	8
1	8	8	8	8	8	8
2	8	8	8	8	8	8
3	8	8	8	8	8	8
4	9	9	9	9	9	9
5	9	9	9	9	9	9
Totals	50	50	50	50	50	50

Brief Description of the Application

The sponsor, Empowerment Academy, is proposing to open a charter school in Chattanooga and serve students in kindergarten through fifth grade. The school, Empowerment

⁴ Empowerment Academy Chattanooga Amended Application, pg. 12

⁵ Empowerment Academy Chattanooga Amended Application, pg. 21-22

Academy Chattanooga (“EAC”), is a new-start school and would be the first school for the sponsor. The proposed school will be organized under Empowerment Academy and proposes to contract with an education service provider (“ESP”), though the vendor has not yet been identified.⁶ The school intends to operate in the city of Chattanooga to “support young boys from historically underserved communities through a small school, relationship-centered model focused on early literacy, academic growth, leadership, and character development.” The school will offer personalized instruction, low student-to-teacher ratios, hands-on learning experiences, consistent mentorship, and provide an opportunity for students in the city of Chattanooga to have additional school options.

The application states that the proposed school will be governed by the Empowerment Academy Board of Directors. In Year 0, Empowerment Academy Chattanooga has budgeted \$315,571 from the Charter Schools Program (“CSP”) grant and board president contributions to offset expenses and projects \$226,756 in expenses for the school. In Year 1, Empowerment Academy Chattanooga projects the school will have \$1,090,350 in revenue and \$715,550 in expenses, resulting in a balance of \$374,800. By Year 5, the school projects to have \$1,038,850 in revenue and \$709,300 in expenses, resulting in a positive ending fund balance of \$1,626,501.⁷ The school anticipates that 75-85% of the student population will qualify as economically disadvantaged, 12-15% of the student population will be students with disabilities, and 5-10% of the student population will be English learners.⁸

⁶ Empowerment Academy Chattanooga Amended Application, pg. 12

⁷ Empowerment Academy Chattanooga Amended Budget

⁸ Empowerment Academy Chattanooga Amended Application, pg. 22

Summary of the Evaluation

The Review Committee recommends the denial of the amended application for Empowerment Academy Chattanooga because the applicant failed to provide sufficient evidence in the academic, operational, financial, and addenda sections to demonstrate that the application meets the required criteria of the rubric.

The applicant's Educational Program Design and Capacity does not meet the standard because the application presented underdeveloped academic structures, ambiguities regarding plans for students with disabilities and English learners, and a lack of verifiable, Chattanooga-specific evidence of community demand. The academic plan fails to articulate a coherent day-to-day instructional methodology for multi-grade classrooms; a deficiency compounded during the capacity interview when leadership offered conflicting explanations regarding how instructional assistants would independently lead separate grade-level content. Furthermore, the design lacks clear integration of the proposed agriculture-science, technology, engineering, and mathematics ("STEM") model and a sound assessment strategy. These structural flaws are exacerbated by significant compliance gaps affecting special populations, including an absence of day one operational details, misaligned staffing budgets, and a speculative reliance on future funding or unidentified vendors. Because the applicant failed to demonstrate local demand, provide a viable multi-grade execution plan, or establish a compliant framework for students with disabilities and English learners, the educational program does not meet the standard.

The applicant's Operations Plan and Capacity does not meet the standard due to multiple deficiencies across governance, organizational structure, facility readiness, staffing pipelines, and executive leadership capacity. The governing board presented inconsistent and contradictory information regarding its roster, roles, and oversight responsibilities—struggling during the capacity interview to identify members or clarify titles—and relies heavily on a single individual without demonstrating how a multi-campus rollout across three dispersed markets was evaluated as feasible. Additionally, the board failed to articulate a process for selecting a statutory parent representative, directly conflicting with their \$50,000 annual contribution bylaw. Operational lines of authority among the board, the central network, and school sites are highly ambiguous, with critical executive roles such as the chief executive officer ("CEO") and chief financial officer ("CFO") remaining vacant. These structural vulnerabilities are further exacerbated by incomplete facility plans that lack agreements, verified timelines, or Americans with Disabilities Act ("ADA") compliance due diligence, and an absent staffing pipeline for the specialized multi-grade model. Consequently, the operational plan fails to demonstrate readiness for authorization.

The applicant's Budget and Finance section does not meet the standard due to major inconsistencies, unsupported financial assumptions, and a lack of internal financial capacity. The submitted operating budget relies heavily on the unawarded federal CSP startup grant and features a critical dependence on informal, personal funding from the board president to cover operating shortfalls rather than a viable, solvent financial model. Furthermore, the budget omits or substantially underfunds essential operational categories, such as food service, technology, and required special education staffing, while holding salaries flat despite narrative commitments to competitive compensation with annual increases. Internal financial capacity is similarly deficient: critical oversight roles like the CFO remain vacant, back-office accounting services lack sufficient budget allocation, and procurement policies and financial monitoring frameworks are incomplete. Because the budget contains material misalignments and fails to reconcile multi-campus cost allocations or demonstrate fiscal solvency, the financial plan does not meet the standard.

Lastly, the applicant's Addenda do not meet the standard due to a lack of demonstrated multi-school operating experience, an unsupported network financial model, an incomplete ESP addendum, and unverified network-level readiness. The organization possesses no prior track record of successfully launching or managing multiple charter schools. The proposal to simultaneously open three campuses across disparate markets demonstrates an unrealistic assessment of the operational complexity a multi-city launch entails. This lack of scaling capacity was underscored during the capacity interview, where representatives offered generalized assurances rather than actionable execution strategies. Moreover, the network budget contains material inconsistencies that fail to reconcile shared central-office allocations and compensation costs—with leadership admitting that network hiring timelines would be driven by contingent enrollment triggers rather than the submitted plan. Finally, Addendum C is underdeveloped, completely omitting a named ESP, draft management agreement, and transparent selection process. Because the applicant failed to present a proven multi-track record, a viable network budget, or complete third-party documentation, the addenda sections do not meet the standard for approval.

Summary of Section Ratings

In accordance with the Tennessee State Board 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
Educational Program Design and Capacity	Does Not Meet Standard
Operations Plan and Capacity	Does Not Meet Standard
Budget and Finance	Does Not Meet Standard
Addenda	Does Not Meet Standard

Analysis of the Educational Program Design and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee

The applicant's Educational Program Design and Capacity does not meet the standard because the applicant presented underdeveloped academic structures, significant ambiguities regarding special populations and service delivery, and failed to provide sufficient evidence to demonstrate authentic community demand in Chattanooga.

The academic plan lacks sufficient clarity and detail on the execution of the educational program. The rubric requires a comprehensive and cohesive educational program that is sound and likely to be implemented successfully. In contrast, the application presents an unclear vision for academic delivery, particularly concerning how multi-grade classroom bands (such as combining grades K-1, 2-3, and 4-5) will simultaneously manage grade-specific learning standards and requirements with a single lead teacher and a single instructional assistant. The narrative fails to articulate a coherent day-to-day instructional methodology for how a teacher will simultaneously implement distinct grade-level curricula within these combined structures, leaving critical operational gaps that do not satisfy the rubric's requirements for instructional quality and academic rigor. When pressed during the capacity interview, the leadership team offered conflicting explanations regarding how instructional assistants would independently lead separate grade-level content, further highlighting the lack of a viable, cohesive academic design.

There is a lack of clarity about how the agriculture and STEM components interact within the school's academic model. Although the application states that agriculture is a core feature, neither the application nor the capacity interview provided specific detail to understand what this looks like in daily instructional practice or how it will meaningfully support academic outcomes. For example, it remains unclear what students would typically be doing in class, how agriculture-based activities are tied to grade-level standards, and how these experiences are designed to improve literacy and other academic measures. Additionally, although some team members have instructional backgrounds, the applicant did not demonstrate the team's capacity to implement the proposed agriculture-STEM model.

These academic deficiencies were compounded by the absence of clear academic goals or a coherent assessment strategy. During the capacity interview, the applicant was unable to articulate how selected assessments would be used to set measurable goals, monitor progress, or drive instructional decisions. While several assessment names were mentioned, the discussion reflected a limited understanding of how these tools function within a comprehensive

assessment system or how they would meaningfully support academic performance monitoring and intervention.

Significant deficiencies also exist regarding the plan for serving special populations. To meet standard, an application must present a clear, compliant plan detailing how students with disabilities and English learners will be identified, supported, and provided a full continuum of services. During the application review and capacity interview, Empowerment Academy Chattanooga exhibited unclear and insufficient knowledge surrounding special education operations. The application lacked rigorous implementation details on how legal mandates under Individuals with Disabilities Education Act ("IDEA") and State Board of Education rules will be met on day one. The structural misalignments between the application narrative and the operational budget failed to account for necessary staffing for students with disabilities and English learners. During the capacity interview, the sponsor stated that once actual enrollment-generated revenue became available, the school would hire the required staff. However, these plans remain speculative, dependent on future funding, and were not reflected in the submitted operating budgets. The team also provided inconsistent information on whether services would be delivered by in-house staff or contracted vendors, noting that no vendors for special education services had been identified and that vendor selection to provide English language instruction was still in the early stages of exploration. Taken together, the contradictions between the narrative, budget, and interview responses, combined with the lack of a clear, resourced, and compliant plan, indicate that Empowerment Academy has not yet demonstrated the capacity to meet mandatory special populations requirements.

The application and capacity interview also showed a lack of sufficient, verifiable evidence of community demand. Per the State Board's rubric, applicants must demonstrate clear local support, yet the evidence provided relied largely on Memphis-based summer camp pilots. A limited number of letters of support were provided from families whose children attended the Chattanooga-based camp. During the capacity interview, the proposed board president stated that they have received sixty-seven intents to enroll from canvassing efforts. This was unable to be verified by the Review Committee as these were not provided within the application materials. Without concrete local due diligence, such as intent-to-enroll forms or representative community surveys, the application does not establish sufficient demand to justify projected enrollment. As a result, the application lacks both the local demand and the demonstrated capacity for execution necessary to support the school's proposed design.

Analysis of the Operations Plan and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee

The applicant's Operations Plan and Capacity does not meet the standard due to deficiencies across governance, organizational structure, staffing pipelines, leadership capacity, and operational readiness for a simultaneous multi-campus launch.

Significant deficiencies persist regarding the governing board's composition, structure, and overall capacity. The application and capacity interview presented inconsistent and often contradictory information about who serves on the board, officer roles, and oversight responsibilities. Specifically, the board members named in the written application did not align with those listed during the capacity interview. While governing bodies can evolve as a school takes shape, the applicant group struggled during the interview to accurately identify members, clarify titles, and describe who currently holds key governance positions, making it difficult to verify the board's collective expertise or commitment. Furthermore, the application and interview indicate a heavy reliance on a single individual, the board president, with minimal active presence or clarity regarding the broader governing body's operational oversight. Given this lack of clarity regarding who constitutes the governing board and the commitment of all its members, it remains unclear how the board evaluated its capacity to determine whether launching three schools simultaneously across geographically dispersed markets was feasible.

These shortcomings directly correspond to the "Does Not Meet Standard" rubric criteria, which identify applications that fail to provide a clear and accurate description of board responsibilities. The applicant's descriptions were inconsistent between the application and the capacity interview, and the information provided in the capacity interview did not provide further clarity. Additionally, when questioned about the statutory parent representative, the applicant struggled to articulate how the board would meet the requirement. Additionally, the board did not address how their current mandate requiring a \$50,000 annual contribution for board participation would apply to the parent representative. This aligns directly with the "Does Not Meet Standard" indicator, noting that no process for identifying, recruiting, or selecting a parent representative is provided.

Further, the capacity interview revealed ambiguity regarding the relationship between the board, the proposed central network, and school-level leadership. Lines of authority for hiring, financial management, vendor contracting, and compliance oversight were unclear, and several central office positions remain vacant or contingent on future funding. The operational plan lacks clear delineation regarding which operational functions, such as day-to-day administrative management, special populations compliance, student safety, and data monitoring, are retained

by site-based staff versus managed centrally. The rotation model described for network support lacked established schedules or protocols, and the proposed organizational structure fails to provide verified, reliable support for on-site instructional leadership, leaving campus directors isolated without site-based administrative counterparts to manage complex daily requirements. When pressed during the capacity interview, the team's inability to clearly articulate foundational reporting lines further underscored that the network lacks the operational clarity required for authorization. These structural and operational ambiguities, along with the absence of well-defined reporting relationships and distinct authority boundaries, significantly undermine the school's readiness for launch.

Critical deficiencies also exist in leadership capacity and the onboarding timeline for network personnel. The rubric evaluates the leadership team's capacity to execute its plan successfully. In contrast, the application and capacity interview confirm that critical executive roles, specifically the CEO and CFO, remain vacant, with hiring tied to future funding triggers. The absence of a confirmed executive leadership team during the pre-opening phase indicates that the applicant does not currently possess the internal organizational capacity required by the rubric to execute the operational plan and ensure compliant startup oversight. Furthermore, proposing a simultaneous three-campus rollout without a staffed management team reflects an unrealistic assessment of startup demands and further undermines the network's readiness for authorization.

The application and capacity interview lacked a clear and complete facility plan. While the applicant referenced memoranda of understanding ("MOUs") with proposed church sites, no formal agreements, verified readiness timelines, or detailed renovation responsibilities were provided. Cost estimates were inconsistent between the application and the budget narrative, and the applicant did not demonstrate a full understanding of legal and practical requirements, such as zoning, occupancy, and ADA compliance. Additionally, backup facility options were described only at a high level, without evidence of concrete due diligence or feasibility analysis. As a result, the facility plan does not meet the standard for demonstrating clear progress, defined responsibilities, or alignment with the school's instructional model and projected enrollment.

The operations plan also fails to establish a viable strategy for recruiting and retaining qualified, licensed instructional staff. The rubric requires a proactive plan with concrete pipelines to attract high-performing educators. The application provides only general statements about teacher outreach without identifying local recruitment sources, university partnerships, or realistic pipelines in the target geographic regions. Given the highly specialized multi-grade classroom model proposed, the lack of a concrete staffing pipeline creates severe vulnerabilities in meeting minimum licensure and endorsement requirements upon opening.

Analysis of the Budget and Finance

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee

The applicant's Budget and Finance does not meet standard because the applicant failed to provide sufficient evidence in the financial section to demonstrate that the application meets the required criteria of the rubric, stemming from major inconsistencies, unsupported assumptions, and a lack of internal financial capacity.

The applicant's Operating Budget and Budget Narrative do not meet the standard because the budget template, budget narrative, and application narrative contain major inconsistencies and unsupported assumptions. Per the scoring rubric, major revenue and expense categories must align across documents and be supported by reasonable, transparent projections. In this case, the submitted operating budget relies heavily on uncommitted federal funds, including \$1.2 million in unawarded CSP startup grant funds, without which the budget projects critical funding shortfalls. When questioned during the capacity interview about how Year 0 and Year 1 operating expenses would be covered in the absence of the CSP grant, the board president stated she would personally provide funding, mirroring her support for a prior summer enrichment pilot. While personal generosity was noted, the rubric and authorizing standards require a solvent, sustainable budget and concrete contingency plans that do not rely on informal, unverifiable personal contributions from a single board member.

Furthermore, the operating budget omits or underfunds several major operational categories required to execute the educational model, including food service, technology infrastructure, student assessments, professional development, and comprehensive student insurance. Although the narrative outlines commitments to competitive teacher compensation, step increases, retention bonuses, and comprehensive benefits, the five-year budget template keeps salaries flat and fails to budget for required staffing positions, such as certified special education and English learner teachers. This creates complete structural misalignment between the program model and financial allocations.

The applicant's Budget and Finance also fails to meet the standard due to a lack of internal capacity, deficient financial systems, and inadequate oversight mechanisms. The rubric requires applicants to detail internal controls, procurement thresholds, and the specific expertise of the team responsible for day-to-day financial management. In the submitted application, critical financial leadership positions remain vacant, and during the capacity interview, representatives confirmed that the hiring of the CFO would be delayed until funding is secured. This leaves no verified internal personnel to manage day-to-day accounting, process payroll, ensure vendor compliance, or oversee fiscal reporting. While the applicant noted an

intention to contract out back-office accounting services, the budget fails to allocate adequate funds for these professional services, and the narrative lacks detailed procurement criteria or a defined vetting process for selecting a compliant provider.

Additionally, the financial management policies outlined in the application, including procedures for idle funds, purchasing thresholds, and travel regulations, are incomplete and overly generalized, lacking the specific approval authorities and monetary thresholds required to maintain strong internal controls. The applicant's financial monitoring framework provides high-level key performance indicators, but fails to establish concrete, phase-specific intervention triggers for the governing board to address emerging deficits or operational strains. Moreover, during the capacity interview, the applicant could not clearly explain how the school could operate sustainably if only one campus were approved. The applicant provided inconsistent and incomplete descriptions of how central office roles, shared service costs, and operational responsibilities would be adjusted in a realistic and financially viable manner. Finally, the network budget and school-level operating budgets do not reconcile properly with respect to shared centralized service fees and cost allocations across multiple campuses, creating further uncertainty about the school's long-term financial solvency.

Because the applicant failed to present a solvent, supportable operating budget or demonstrate internal financial capacity, the financial plan does not meet the standard for approval.

Analysis of Addenda B: Sponsors proposing to open a new school that will create a network; C: Sponsors seeking to contract with a third-party education service provider (ESP), including a management organization; D: Sponsors seeking approval of multiple schools during this application cycle or as part of an existing network/CMO

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee

The applicant's Addenda do not meet the standard due to a lack of demonstrated multi-school operating experience, an unsupported network financial model, and an incomplete ESP addendum.

Per the State Board of Education's scoring rubric, an application proposing a multi-school network or replication model must present a clear, viable five-year growth plan, a proven track record of successfully opening and managing multiple schools, and a realistic network-level budget with well-supported assumptions. In contrast, the documentation provided in Addendum B and Addendum D of the application reveals that the organization lacks a demonstrated track record of successfully launching or managing multiple charter schools. Proposing to simultaneously launch three charter school campuses from the ground up across geographically dispersed markets (Chattanooga, Nashville, and Memphis) without a seasoned management team or prior scaling experience represents an unrealistic assessment of organizational capacity and operational complexity. When pressed during the capacity interview regarding how the founding group intended to manage simultaneous openings across three distinct regions, representatives offered generalized assurances rather than actionable execution strategies, further exposing a critical gap in network-level readiness.

Furthermore, the network-level budget and shared-services model did not demonstrate financial viability, with multiple conflicts noted between the written application narrative and information shared during the capacity interview. The rubric requires attachment of a complete, realistic, and viable network budget showing adequate funding to support new schools without creating financial instability. Despite this requirement, the network budget contains minimal details and material inconsistencies that do not properly reconcile shared central-office allocations, compensation costs, and school-level operating expenses. For example, while the application included guaranteed salaries for all proposed network staff, leadership stated during the capacity interview that the hiring timeline and compensation for these individuals would be driven entirely by enrollment triggers and which specific campuses successfully open. This directly contradicts the submitted plan, making it impossible to verify what the actual operational and financial model entails. When pressed during the capacity interview about these compounding fiscal gaps, the true timing of personnel costs, and how shared-service fees were

calculated across the three proposed sites, leadership was unable to provide a coherent methodology or cost-allocation breakdown, further demonstrating that the network budget lacks the reliability required for multi-campus financial sustainability.

Addendum C, regarding the third-party ESP, is severely underdeveloped and incomplete. The applicant did not identify a specific ESP, omitting the provider's name, a draft management agreement, performance metrics, and a transparent selection process. Without a named provider or contract, the review committee cannot evaluate the ESP's educational track record, financial controls, potential conflicts of interest, or organizational capacity to support the network. When questioned during the capacity interview, the applicant group was unable to provide any further clarity or name a prospective provider, leaving the entire operational and academic framework for third-party management entirely unverified.

Finally, across Addendum B and Addendum D, ownership and execution of key operational and governance functions are inadequately delineated between the network and individual campuses. The responses rely heavily on future hiring and prospective network systems rather than demonstrating current operational readiness, leaving critical gaps in multi-school governance and administrative oversight. Because the applicant failed to demonstrate a proven multi-school operating track record, present a viable network financial model, or provide complete addenda documentation, the addenda sections do not meet the standard for approval.



Evaluation Team

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

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

Lizzie Eisen has over 14 years of experience in K-12 education as a teacher, school leader, and consultant. She began her career as an elementary school teacher. Lizzie was on the founding team and later served as K-8 Principal at Nashville Classical Charter School. Since 2022, Lizzie has consulted with more than 60 schools in Tennessee and nationally, focusing on teacher and leader development, instructional improvement, and school growth. She has particular expertise in literacy curriculum and instruction, professional development, and school design and operations. Her combined experience in the classroom, school leadership, and consulting provides a broad perspective on effective school practice.

Beth Elpers 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.

Pam Lehman currently serves as the Manager of Strategic Initiatives for the Tennessee Public Charter School Commission. She holds a B.A. in English from the University of Wisconsin-Madison and an M.A. in Curriculum and Instruction from the University of Mississippi. Pam



began her career in education as an English Language Arts teacher, having taught abroad in Phnom Penh, Cambodia as well as in Mississippi Public Schools and Metro Nashville Public Schools. Prior to joining the Charter Commission, she worked in education research at Vanderbilt University and served in the Division of Choice at the Tennessee Department of Education.

Nathan Parker is an Instructional Assistant Professor in the Department of Educational Administration and Foundations at Illinois State University and an independent consultant. He has nearly 20 years of experience in K-12 education spanning classroom teaching, school and district leadership, state government, and higher education. Previously, Nate held several leadership roles with the State of Tennessee, including Director of School Programs and Supports at the Public Charter School Commission and Senior Director of School Choice at the Department of Education. In these roles, he supported charter school authorization, school improvement, education policy, and the expansion of high-quality educational opportunities for Tennessee students and families. Nate holds a B.A. and an M.P.A. from The Ohio State University, as well as an M.Ed. from Arizona State University. He earned an Ed.D. in K-12 Education Policy and Leadership from Vanderbilt University, where he also served as an adjunct professor in the Peabody College of Education and Human Development.

Jeff Wasbes is a consultant working closely with charter schools and charter school authorizers on strategic planning and systems improvement. Prior to starting his consultancy in 2024, he served as the Executive Deputy Director for Accountability for the SUNY Charter Schools Institute in New York where he specialized in developing, implementing, and refining systems for evaluating the quality of charter applications and schools. Mr. Wasbes was a high school math teacher and a program evaluator focusing primarily on teacher quality improvement programs prior to joining the SUNY team. Jeff holds a master of public administration degree with a specialization in decision making and management systems.