



Executive Director's Recommendation Empowerment Academy Memphis Appeal

Pursuant to Tennessee Code Annotated ("T.C.A.") § 49-13-108, sponsors proposing to open a new charter school may appeal the denial of its amended application by a local board of education to the Tennessee Public Charter School Commission ("Commission"). On August 7, 2026, the sponsor of Empowerment Academy Memphis ("sponsor" or "EAM") appealed the denial of its amended application by the Memphis-Shelby County Schools ("MSCS") 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 Memphis 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 MSCS Board of Education to deny the amended application for Empowerment Academy Memphis

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 Memphis 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 appealed, 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, 2025, the sponsor submitted a letter of intent to Memphis-Shelby County Schools expressing its intention to file a charter school application.
2. The sponsor submitted its initial application for Empowerment Academy Memphis to MSCS on February 2, 2026.
3. MSCS assembled a review committee to review and score the Empowerment Academy Memphis initial application.
4. On March 10, 2026, the MSCS Review Committee conducted a capacity interview with representatives of Empowerment Academy Memphis.
5. The MSCS Review Committee reviewed and scored the Empowerment Academy Memphis initial application, indicating concerns with the academic model, programming and focus, special populations, parent/community support and demand, recruitment, saturation, facilities, transportation, network growth, fiscal operations, procedures and sustainability, governance structure and long-term sustainability, and local leadership capacity.
6. On April 28, 2026, the MSCS Board of Education voted to deny the Empowerment Academy Memphis initial application.
7. The sponsor amended and resubmitted its application for Empowerment Academy Memphis to MSCS on May 29, 2026.
8. The MSCS Review Committee reviewed and scored the Empowerment Academy Memphis amended application based on the scoring rubric and rated the academic, operations, finance, and addenda sections as partially meets the standard.
9. On July 28, 2026, the MSCS Board of Education voted to deny the amended application of Empowerment Academy Memphis.
10. The sponsor appealed the denial of the Empowerment Academy Memphis amended application in writing to the Commission August 7, 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 Memphis amended application using the state's scoring rubric.
12. The Commission's Review Committee conducted a capacity interview with key members of the Empowerment Academy Memphis leadership team on September 11, 2026, via Microsoft Teams.

13. After the capacity interview, the Commission's Review Committee determined a final consensus rating of the Empowerment Academy Memphis amended application, which served as the basis for the Review Committee Recommendation Report, attached hereto as **Exhibit A**.
14. On September 18, 2026, the Commission staff held a public hearing at Barnes Auditorium in Memphis, Tennessee. At the public hearing, the Executive Director, sitting as the Commission's designee, heard presentations from the sponsor and MSCS and received public comment regarding the Empowerment Academy Memphis 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 MSCS, 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 MSCS to review and score the Empowerment Academy Memphis initial application consisted of the following individuals:

Name	Title
Keisha Adams	MSCS Project Advisor, Safety and Security
Chiquita Allen	MSCS Advisor, Family Partnerships & School Support
Valencia Beattie	MSCS Registered Nurse, Health Services
Phelicia Cunningham	MSCS Advisor, Assessment and Accountability
Angela Dokes	MSCS Routing Specialist, Transportation
Eboni Gales	MSCS Advisor, Attendance and Discipline
Cabrida Grady	MSCS Lead Reviewer-Advisor, Charter School Development
Trinka Hicks	MSCS Professional School Counselor, Alternative Schools
Kimberly Jackson	MSCS Manager, CTE
Kelly King	MSCS Honors Advisor, Optional Schools
Steven Kuhn	MSCS ESL Advisor, Charter Schools
Richard Lewis	MSCS School Operations Manager, Nutrition Services
Shannen Lipsey	MSCS Advisor, Federal Programs
Brittany Monda	Expert External Reviewer
Alexander Roberson	Expert External Reviewer
Carla Shirley	MSCS Research Advisor, Research and Performance Management
Theron Stallworth	MSCS Director, Labor Relations

Name	Title
LaKeva Thompson	MSCS Instructional Advisor, Charter Schools
Christian West-Coleman	MSCS Associate General Counsel
Erika Williams	MSCS Instructional Facilitator, Exceptional Children
Elizabeth Woodcock	Charter Leader Reviewer

The Empowerment Academy Memphis initial application received the following ratings from the MSCS Review Committee:

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

After the MSCS Review Committee completed its review and scoring of the initial application, its analysis was presented to the MSCS Board of Education April 28, 2026. The MSCS Board of Education voted to deny the initial application of Empowerment Academy Memphis.

District Denial of Amended Application

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

Name	Title
Chiquita Allen	MSCS Advisor, Family Partnerships & School Support
Valencia Beattie	MSCS Registered Nurse, Health Services
Phelicia Cunningham	MSCS Advisor, Assessment and Accountability
Eboni Gales	MSCS Advisor, Attendance and Discipline
Cabrida Grady	MSCS Lead Reviewer-Advisor, Charter School Development
Kimberly Jackson	MSCS Manager, CTE
Kelly King	MSCS Honors Advisor, Optional Schools
Steven Kuhn	MSCS ESL Advisor, Charter Schools
Richard Lewis	MSCS School Operations Manager, Nutrition Services
Shannen Lipsey	MSCS Advisor, Federal Programs
Brittany Monda	Expert External Reviewer
Carla Shirley	MSCS Research Advisor, Research and Performance Management
Theron Stallworth	MSCS Director, Labor Relations
Erika Williams	MSCS Instructional Facilitator, Exceptional Children

Name	Title
Elizabeth Woodcock	Charter Leader Reviewer

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

Sections	Ratings
Educational Program Design and Capacity	Partially Meets Standard
Operations Plan and Capacity	Partially Meets Standard
Budget and Finance	Partially Meets Standard
Addenda	Partially Meets Standard

After the MSCS Review Committee completed its review and scoring of the amended application, its analysis was presented to the MSCS Board of Education on July 28, 2026. At the July 28, 2026, board meeting, the MSCS Board of Education voted to deny the amended application of Empowerment Academy Memphis.

Commission Review Committee's Evaluation of the Application

Following the denial of the Empowerment Academy Memphis 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 Memphis 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 Memphis 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 Memphis 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 Memphis 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 due to weaknesses in academic planning, instructional design, and support for special populations. The application presents an underdeveloped educational framework and fails to clearly articulate how the proposed 150-student model will be implemented. These concerns were reinforced during the capacity interview, where school leadership provided inconsistent explanations regarding instructional delivery and the role of instructional assistants. The proposed agriculture-focused science, technology, engineering, and mathematics ("STEM") model lacks a clear connection to the broader instructional program, and the assessment framework is insufficiently developed. Furthermore, the application does not provide adequate operational detail for serving students with disabilities and English learners, includes staffing and budget inconsistencies, and relies on uncertain future funding and unidentified service providers to address critical programmatic needs.

The applicant's Operations Plan and Capacity does not meet the standard due to substantial concerns related to governance, organizational structure, facilities, staffing, and leadership readiness. During the capacity interview, the governing board demonstrated an inconsistent understanding of its composition, member roles, and oversight responsibilities, raising concerns about its ability to effectively govern a growing network. The board also did not provide a clear process for identifying and appointing a statutory parent representative in a manner consistent with its bylaws. Organizational reporting structures among the board, network leadership, and school-level personnel remain unclear, while key executive positions, including the chief executive officer ("CEO") and chief financial officer ("CFO"), are either vacant or dependent on future funding. Facility plans lack sufficient documentation, verified timelines, and evidence of due diligence regarding accessibility and site readiness. These concerns are compounded by the absence of a credible staffing pipeline to support the proposed expansion.

The applicant's Budget and Finance section does not meet the standard because the financial plan contains material inconsistencies, unsupported assumptions, and limited evidence

of internal fiscal capacity. The budget is heavily dependent on unawarded startup grant funding and informal financial support from the board president to address projected operating deficits and therefore does not demonstrate a sustainable financial model. Additionally, several critical expenditure categories, including food service, technology, and special education staffing, appear omitted or significantly underfunded. Compensation projections are also inconsistent with narrative commitments to competitive teacher salaries. Internal financial oversight remains a concern, as key leadership positions such as the CFO have not been filled, accounting services appear inadequately resourced, and financial monitoring and procurement practices are not fully developed. As presented, the budget does not adequately demonstrate long-term fiscal viability or accurately reconcile costs associated with operating multiple campuses.

Lastly, the applicant's Addenda do not meet the standard due to insufficient evidence of multi-school operating capacity, weaknesses in the network financial model, and incomplete third-party management documentation. The organization has not demonstrated prior success in opening or managing multiple charter schools, making the proposal to launch three campuses simultaneously across separate markets difficult to substantiate. During the capacity interview, applicants provided general assurances regarding network expansion but did not offer detailed implementation strategies. The network budget also contains inconsistencies related to shared services, staffing allocations, and projected hiring timelines. In addition, the education service provider ("ESP") addendum remains incomplete, lacking a designated provider, draft management agreement, and clear selection process. Collectively, these deficiencies prevent the applicant from demonstrating adequate organizational readiness, financial sustainability, and operational capacity to support the proposed network expansion.

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 Memphis 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 Friday, September 18, 2026. Representatives from Memphis-Shelby County Schools at the public hearing focused on the district's application review process,

⁴ T.C.A. § 49-13-108.

the support that was provided to the applicant throughout the review process, and the reasons for denial of the application. Representatives from Memphis-Shelby County Schools indicated that the Empowerment Academy Memphis amended application was denied due to academic program design deficiencies, insufficient governance capacity and operational readiness, budget inconsistencies, and a lack of transparency in network structures. MSCS's review process consisted of internal and external Charter Application Review Team ("CART") reviewers who underwent training during both initial and amended rounds, with over-assigned subject-matter experts to account for reviewer attrition. The district highlighted that the application received a rating of "Partially Meets Standard" across all categories, noting limited evidence of mission alignment and agriculture integration, underdeveloped recruitment and enrollment plans, and inadequate provisions for students with disabilities and English learners. Furthermore, using District Policy 1011 and the Feasibility of Proposed Geographic Location and Needs Alignment Assessment ("EPDR"), the review team determined there was no demonstrated community need for a new school at the proposed Pillow Street location. Operationally, MSCS expressed concerns regarding the board's capacity to oversee three simultaneous school launches across different cities (Chattanooga, Nashville, and Memphis), persistent inconsistencies between board policies and bylaws, and an unclear operational structure. Financially, the district stated that the budget relied on unsupported assumptions, unsecured funding sources, and unawarded grants, while containing continuing inconsistencies between staffing, compensation, and operational assumptions.

In the sponsor's opening statement, the sponsor outlined Empowerment Academy Memphis as a small-school, literacy and agriculture-centered model designed for 150 young men in South Memphis at Pilgrim Rest Baptist Church. The presentation highlighted the school's targeted all-male approach, rigorous core curricula (including CKLA, Amplify Math, and Amplify Science), comprehensive operational and financial sustainability plans, and supporting community feedback. The application for Empowerment Academy Memphis was initiated because of strong community backing from local leaders and the African Methodist Episcopal ("AME") Church, targeting areas with low Tennessee Comprehensive Assessment Program ("TCAP") scores. The sponsor explained that they chose the charter school route to partner with the LEA, start early, and reach children in Memphis. Addressing their multi-school rollout, leadership noted that an outpouring of support from the AME Church and strong initial interest in Memphis led them to pursue a multi-campus application, having tested interest through summer enrichment camps across three locations. Since the 2025 summer camps, the sponsor noted ongoing community development and parent meetings via Zoom. On the financial side, the applicant shared that the school would not incur pre-opening expenses because the local church will not charge rent until opening, and they anticipate donor contributions, including a

pledged \$100,000 personal donation from the board president, alongside startup funding.

During questioning by the Commission, MSCS was asked to elaborate on its review process, post-amendment feedback, and financial evaluations. The district explained that after the initial denial, it provided detailed feedback, training slide decks covering what was reviewed, and offered 30-minute blocks for individual school-specific debrief meetings. However, the applicant failed to respond to these opportunities. Regarding geographic need, MSCS detailed that its neighborhood analysis under Policy 1011 found no need for a new school at the proposed location. Regarding board capacity and financial viability, MSCS reiterated that attempting to launch three schools simultaneously with an unproven track record, conflicting enrollment figures fluctuating between 50 and 150 students across different parts of the application, and a heavy reliance on unsecured funding sources created unacceptable fiscal and operational risks. Furthermore, the district noted that while the application provided some information on the centralized network, the budget lacked clarity on how shared services and central staffing allocations were calculated, how amounts related to one another, or whether they duplicated costs among the network of schools.

The Commission then questioned Empowerment Academy Memphis regarding community demand, governance separation, financial solvency, and the multi-school rationale. The sponsor explained that they targeted South Memphis because of community support from leaders and the AME Church in areas with low test scores and used summer enrichment camps to reach students early. The sponsor clarified the broader community engagement strategy, detailing how partnerships span local churches, the YMCA, and the Boys & Girls Club, as well as ongoing parent meetings via Zoom. They also explained the agricultural model, emphasizing that before touching dirt, students touch a book to understand global food systems, plant a garden to learn self-sustainability, and conduct soil testing tied to academic standards.

Addressing the rationale for three schools, leadership noted pressure from the AME Church and strong initial interest in Memphis. Regarding governance and operations, the sponsor outlined the board roster and stated that pre-opening would be handled by the core executive team consisting of the CEO, chief operations officer (“COO”), and chief technology officer (“CTO”) using free computers. Finally, addressing financial viability if only the Memphis campus is approved or if the unawarded Charter Schools Program (“CSP”) grant is absent, the leadership team explained how central office roles would adjust, such as dropping the CFO position and outsourcing to a certified public accountant (“CPA”) or consultant, and leaned heavily on projected philanthropy, in-kind contributions, roughly \$200,000 in expected donations, an incoming \$18,000 donation, and a pledged \$100,000 personal donation from the board president to secure a balanced budget, asserting that local churches will not charge rent until the school officially opens.

The public hearing concluded with closing statements by both parties and the receipt of six in-person comments, with zero speaking in support of MSCS and six speaking in support of Empowerment Academy Memphis. The Commission also accepted written comments, and the Commission received eleven written comments, with zero writing in support of MSCS and twelve writing in support of Empowerment Academy Memphis.

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 Memphis amended application did not rise to the level of meeting or exceeding the standards required for approval.

Public charter schools are designed to improve learning for all students through innovative methods. Only schools with a proven capacity in all areas: Educational Program Design and Capacity, Operations Plan and Capacity, Budget and Finance, and Addenda, if applicable, will be recommended for approval. It is the mission of the Tennessee Public Charter School Commission to only approve applications of high quality and a realistic plan for success.

Any sponsor seeking to establish a charter school enters 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

⁵ T.C.A. § 49-13-108.

⁶ T.C.A. § 49-13-102.

education and, on an appeal, the Commission conduct 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 Memphis and desire to make a difference in male students' lives are evident throughout the record, the amended application has significant gaps to close prior to it being ready for approval.

In review of the Educational Program Design and Capacity for Empowerment Academy Memphis, I agree with the Review Committee that the plan does not meet the standard for approval. While the educational plans for Empowerment Academy Memphis 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 integrating it effectively 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 implementing the model.

Within the application, agriculture is described as integral to the academic model. However, the proposed implementation plan lacks significant detail. There is little evidence that the proposed academic program is responsive to the targeted student demographic, nor is it clear which instructional strategies will be used. Academic decisions, particularly those critical to student outcomes, should be grounded in data and student needs, reflected in the application, or explained with clarity in the capacity interview. This clarity was lacking in this appeal.

The sponsor emphasized that community members asked for solutions to low proficiency scores. This request, coupled with collaboration with the African Methodist Episcopal Church, motivated the decision to pursue a public charter school rather than a private school. Community support is indeed an important factor in demonstrating sponsor capacity. I believe that the sponsor is committed to the growth of the South Memphis community. The public comments at the hearing emphasized the desire for a small-school option in the community. However, the sponsor relies heavily on a 2025 summer enrichment program to demonstrate the proposed model's viability. This enrichment program does not reflect the academic model outlined in the application. It does not explain the educational program and does not connect to the school's mission or stated outcomes.

The sponsor presented examples of field trips and exploratory activities that, while positive experiences, do not provide meaningful evidence of academic effectiveness. The

sponsor testified during the public hearing that the summer programs reflected an even distribution of student grade bands; however, the sponsor also stated that since the summer camps, there has been greater interest in kindergarten through second grade. When asked how it would adjust its academic model if there was not even distribution across grades, the sponsor did not provide any evidence of how the plan would be adjusted to account for this change in potential enrollment. Overall, the application does not include the comprehensive, sustainable academic plan required for approval.

Additionally, the sponsor has not demonstrated sufficient planning to meet the needs of students with disabilities. While multiple identification methods were listed, the application does not explain how the school would operationalize support for these students in compliance with federal law. The sponsor explicitly acknowledged that many prospective students would require services, yet this awareness did not translate into a more robust or detailed plan. During both the capacity interview and the public hearing, the sponsor failed to provide concrete strategies or a comprehensive plan for serving students with disabilities. The sponsor also indicated an intent to contract with an external provider for special education services, but the application does not outline how that partnership would function or ensure readiness on day one for all enrolled students. The proposed budget also does not account for this expense. It is paramount that any application recommended for approval includes a reliable plan to serve all students who would attend Empowerment Academy Memphis. For these reasons, and consistent with the concerns previously described, I cannot recommend this application for approval. The sponsor has not demonstrated the capacity, detailed planning, or operational readiness necessary to ensure high-quality academic programming and adequate support for all students.

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, significant 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. 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. 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.

The facility plan lacks sufficient detail to meet the standard for approval. Although the sponsor identified Pilgrim Rest Baptist Church in Memphis as the permanent facility and stated that no rent or maintenance costs would be incurred, the application does not include any details demonstrating the facility's viability for use as a public charter school. The sponsor did not provide a letter of intent or a memorandum of understanding ("MOU") affirming the testimony that the facility would not incur lease or renovation costs. This information is critical to determine whether the budget is realistic and ripe for an approval recommendation. Relying on the sponsor's testimony, essential information is missing, including whether the building is properly zoned for school use, what renovations would be required to meet Americans with Disabilities Act ("ADA") standards, and the anticipated timeline for ensuring the site is ready for students. The evidence submitted with the application appears to be a lease template that includes no specific details. Without critical information, I cannot make an adequate assessment of facility readiness.

The sponsor's application provides general strategies for recruiting and retaining teachers. To meet the standard for approval, a plan should provide a multi-faceted, proactive plan, and as submitted, this application does not reflect this necessary information. 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. Again, 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 despite the proposed head of schools being based in Memphis, as the application also indicates that this position is responsible for the professional development for staff of its two additional schools in Nashville and Chattanooga.

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 verbal commitment lacked essential details, such as whether it would be recurring, the amount, whether the funds would be a donation or a loan, and any conditions attached. The board chair also testified during the public hearing that she was committing an additional \$100,000 to Empowerment Academy Memphis. But, like the capacity interview, vital details around that contribution were lacking from this testimony. The sponsor highlighted that board members have invested approximately \$200,000 in the application process but this is not dispositive of a financial plan that can sustain a public charter school. Further, reliance on board member financial contributions heightens previously identified concerns about actual or perceived conflicts of interest and raises questions about the board's ability to make impartial financial and operational decisions.

With or without the CSP grant, the sponsor's overall budget contains inconsistencies across several critical line items necessary for sustainable operations, including transportation, food services, and professional development. The discrepancies between the budget narrative and the template further call into question the sponsor's capacity and readiness to open. When asked about these issues, the sponsor stated that some amounts were entered based on direction or unclear guidance from local boards of education. Even assuming some misunderstanding, the financial plan remains severely underbudgeted. For example, the sponsor testified that Year 0 would be funded through financial contributions from board members. Given that the bylaws require a minimum of three board members contributing \$50,000 each, the total of \$150,000 falls short of the projected Year 0 expenses of \$226,756. Additionally, this application is one of three pending before the Commission. The sponsor's contingency plan does not account for the possibility that fewer than three schools might be approved. Based on the inconsistencies in the budget and the lack of a credible contingency plan, I do not believe the sponsor has demonstrated the financial capacity to sustain a single school, without consideration of network implications.

Finally, the addenda does not meet the standard for approval. There is little evidence demonstrating the proposed governing board and network's ability to simultaneously launch three charter schools in three distinct geographic areas. While I appreciate the board chair's reference to the organization's summer camps as a demonstration of their ability to operate

three campuses at once, there are significantly greater regulations, operational requirements, and financial investments to successfully open and operate a charter school. There is insufficient evidence provided that this plan is achievable. Additionally, the section on the ESP was underdeveloped. There was no named ESP, draft agreements, or rationale for selecting an ESP. This lack of details results in this section not meeting the standard.

The sponsor is advancing a noble mission to support Tennessee male students, and I appreciate the efforts to improve their academic outcomes. However, the application, as amended, does not reflect a readiness to open in the academic, operational, and financial plans. 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 Memphis 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 Memphis was contrary to the best interests of the students, the LEA, or community. Therefore, I recommend that the Commission affirm the decision of the MSCS Board of Education to deny the amended application for Empowerment Academy Memphis.



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 Memphis

Sponsor: Empowerment Academy

Proposed Location of School: Memphis-Shelby County Schools

Evaluation Team:

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



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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, and financial plans.
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 which 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 Memphis

Sponsor: Empowerment Academy

Proposed Location of School: Memphis-Shelby County Schools

Mission: Empowerment Academy Memphis (“EAM”) 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. EAM 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	25	25	25	25	25	25
1	25	25	25	25	25	25
2	25	25	25	25	25	25
3	25	25	25	25	25	25
4	25	25	25	25	25	25
5	25	25	25	25	25	25
Totals	150	150	150	150	150	150

⁴ Empowerment Academy Memphis Amended Application, pg. 12

⁵ Empowerment Academy Memphis Amended Application, pg. 19

Brief Description of the Application

The sponsor, Empowerment Academy, is proposing to open a charter school in Shelby County and serve students in kindergarten through fifth grades. The school, Empowerment Academy Memphis ("EAM"), 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 Memphis 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."⁷ The school proposes to offer personalized instruction, low student-to-teacher ratios, hands on learning experiences, consistent mentorship, and provide students in the city of Memphis with 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 Memphis has budgeted \$315,571 in revenue from the Charter Schools Program ("CSP") grant and board president contributions and projects \$261,574 in expenses for the school. In Year 1, Empowerment Academy Memphis projects the school will have \$1,922,250 in revenue and \$1,490,369 in expenses, resulting in a balance of \$431,881. By Year 5, the school projects to have \$1,870,750 in revenue and \$1,476,119 in expenses, resulting in a positive ending fund balance of \$1,924,904.⁸ The school anticipates that 80-85% of the student population will qualify as economically disadvantaged, 12-14% of the student population will be students with disabilities, and 8-12% of the student population will be English learners.⁹

⁶ Empowerment Academy Memphis Amended Application, pg. 12

⁷ Empowerment Academy Memphis Amended Application, pg. 17

⁸ Empowerment Academy Memphis Amended Budget

⁹ Empowerment Academy Memphis Amended Application, pg. 20

Summary of the Evaluation

The Review Committee recommends the denial of the amended application for Empowerment Academy Memphis 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, and significant ambiguities regarding students with disabilities and English learners. The academic plan fails to articulate a coherent instructional methodology for implementing the 150-student model. This deficiency was compounded during the capacity interview, when leadership offered conflicting explanations about how instructional assistants would independently lead separate 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 deepened by significant compliance gaps regarding special populations, including an absence of day-to-day operational details, misaligned staffing budgets, and speculative reliance on future funding or unidentified vendors. Because the applicant failed to provide a viable 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 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 and struggled during the capacity interview to identify members or clarify titles. The board also 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 without violating its \$50,000 annual contribution bylaw. Operational lines of authority between the board, central network, and school sites are highly ambiguous, with critical executive roles like the chief executive officer ("CEO") and chief financial officer ("CFO") remaining vacant or 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") for the proposed Pilgrim Rest Baptist Church site, as well as an absence of a staffing pipeline. 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 unawarded federal CSP startup grants 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 populations staffing, while holding salaries flat despite narrative commitments to competitive compensation. 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. The budget contains material misalignments and fails to reconcile multi-campus cost allocations to demonstrate fiscal solvency.

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 did not 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.

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 due to an underdeveloped academic model, unclear goals and assessments, and insufficient plans for special populations.

The academic plan lacks sufficient clarity and detail on the actual 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 regarding how classes are proposed to have twenty-five students per teacher, which is on par with traditional public schools, despite emphasizing small cohorts for individualized instruction. Although some team members have instructional backgrounds, the applicant did not demonstrate a cohesive plan or capacity to implement the proposed agriculture-STEM model. The narrative fails to articulate a coherent day-to-day instructional methodology or explain how agricultural activities align with grade-level standards, support literacy, or integrate with STEM learning. When pressed during the capacity interview, the leadership team offered conflicting explanations regarding how instructional assistants would independently deliver separate grade-level content, further highlighting the lack of a viable, cohesive academic design.

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 multiple assessments were mentioned and the board president stated her preference for one specific assessment, the discussion reflected 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, the Empowerment Academy Memphis team exhibited unclear and insufficient knowledge surrounding special populations 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, and the structural misalignments between the application narrative and the

operational budget failed to account for necessary staffing for students with disabilities or 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 full-time employees or contracted vendors, noting that no vendors for special education services had been identified. 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 Memphis has not yet demonstrated the capacity to meet mandatory special populations requirements.

Because the academic design, special populations plan, and assessment strategy are misaligned with rubric requirements, the Educational Program Design and Capacity does not meet the standard.

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 significant 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. 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 its members, it remains unexplained how the board evaluated its capacity to determine that 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. Additionally, when questioned about the statutory parent representative, the applicant struggled to articulate how the board would meet the requirement without violating its current \$50,000 annual contribution mandate for board participation.

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 supports 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 the network's lack of operational clarity required for authorization.

Critical deficiencies also exist in leadership capacity and the onboarding timeline for network personnel. The application and interview confirm that critical executive roles, specifically the CEO and CFO, remain unfilled, with hiring tied strictly to future funding triggers. The absence of a confirmed executive leadership team during the pre-opening phase presents substantial compliance and execution risks regarding organizational oversight, administrative execution, and the ability to manage startup operations. Proposing a simultaneous three-campus rollout without a fully 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 for the proposed Pilgrim Rest Baptist Church site. While the applicant referenced 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. Finally, the operations plan fails to establish a viable strategy for recruiting and retaining qualified, licensed instructional staff, offering only general statements about teacher outreach without identifying local recruitment sources or realistic pipelines within the target geographic regions. Because the applicant failed to provide a coherent governance structure, operational plan, leadership capacity, or facility readiness, the Operational Plan and Capacity section does not meet the standard.

Analysis of the Budget and Finance

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee

The applicant's Budget and Finance section does not meet the standard because the application lacks sufficient evidence of financial feasibility resulting from significant discrepancies, unsupported revenue projections, and a critical shortage of internal financial oversight required by the rubric.

The Operating Budget and accompanying narrative fail to satisfy evaluation standards due to persistent inconsistencies between the application, budget, and what was shared within the capacity interview paired with speculative funding assumptions. Specifically, the financial plan relies heavily on uncommitted federal funds, including \$1.2 million in an unawarded grant, which creates severe funding deficits across Year 0 and Year 1. When questioned during the capacity interview about how early operational expenses would be covered without these funds, the board president indicated she would personally cover the costs, drawing a parallel to a previous summer enrichment pilot. While this demonstrates personal commitment, authorizing standards and the evaluation rubric require a self-sustaining, solvent operating budget backed by verified contingency plans rather than informal, unguaranteed financial contributions from an individual.

Additionally, the operating budget omits or substantially underfunds several critical operational categories necessary to implement the school's instructional model, including food services, technology infrastructure, student assessments, professional development, and comprehensive student insurance. Furthermore, a structural misalignment exists between the program narrative and financial allocations. Although the application outlines commitments to competitive teacher compensation, annual step increases, performance bonuses, and robust benefits, the five-year budget template keeps employee salaries flat. The budget also fails to allocate funding for mandatory compliance roles, such as certified special education and English learner educators, creating a major gap between the school's proposed design and its financial plan.

The applicant's financial plan also falls short of the standard due to structural deficiencies in internal oversight and administrative design. Essential financial leadership positions, including the CFO, remain vacant, with the school stating during the capacity interview that recruitment will be postponed until funding is secured. This leaves the network without qualified internal personnel to manage routine accounting, process payroll, ensure vendor compliance, or oversee fiscal reporting. Although the applicant intends to outsource back-office financial services, the

budget does not reserve sufficient funds for these professional contracts, and the narrative omits clear procurement standards or a vendor-vetting protocol.

Moreover, the proposed financial management policies, including operational practices for purchasing, travel, and idle funds, are overly broad and lack the details necessary for sound internal controls. The financial monitoring practices similarly omit specific monitoring practices and intervention triggers for tracking emerging deficits. During the capacity interview, the applicant was unable to clearly explain how the school could sustain operations if only one campus were approved, providing vague descriptions of central office adjustments. Finally, the network-level budget fails to reconcile centralized service fees with individual school-level budgets, leaving long-term financial solvency unverified. 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 because the submission lacks a proven track record of multi-school management, presents an unsupportable network financial framework, and provides incomplete documentation for a third-party education service provider.

According to State Board of Education evaluation standards, any group proposing a multi-campus replication model must outline a realistic five-year expansion plan, demonstrate past success in opening and operating multiple public charter schools, and furnish a reliable network-level budget built on sound assumptions. However, the review of Addendum B and Addendum D indicates that the organization possesses no prior experience launching or scaling multiple school sites. Attempting to simultaneously open three distinct campuses from the ground up across geographically dispersed regions, specifically Chattanooga, Nashville, and Memphis, without an experienced leadership team or prior replication experience, reflects an unrealistic evaluation of organizational capacity and administrative complexity. During the capacity interview, when committee members asked how leadership planned to execute simultaneous launches across these three markets, representatives offered broad assurances rather than concrete, actionable execution strategies, highlighting a major deficiency in network-level preparedness.

Additionally, the network-level budget and shared-services framework failed to establish financial viability, featuring significant contradictions between written materials and statements made during the interview. The evaluation rubric mandates a comprehensive, realistic network budget that ensures adequate funding for new campuses without risking overall financial stability. In contrast, the network budget lacks the necessary detail and contains material discrepancies that fail to properly balance shared central office overhead, network staffing costs, and individual school operational expenses. For instance, while the written application guaranteed salaries for all proposed network personnel, leadership acknowledged during the interview that hiring schedules and compensation packages would depend on enrollment triggers and campus-specific approval outcomes. This type of contradiction between written commitments and oral statements makes it impossible to verify the true operational model. When questioned further regarding these financial gaps, the timing of personnel expenditures,

and the specific methodology used to calculate shared-service fees across the three locations, representatives could not provide a coherent cost-allocation breakdown.

Addendum C, which covers the proposed third-party ESP, is underdeveloped. The applicant omitted the name of an ESP, a draft management agreement, performance accountability metrics, and a transparent vetting process. Without a designated provider or formal contract, authorizers cannot assess the organization's educational history, financial stability, potential conflicts of interest, or capacity to support a multi-school network. When probed during the interview, the applicant group remained unable to name a prospective provider or offer additional clarification, leaving the operational and academic mechanisms of third-party management completely unverified.

Finally, across Addendum B and Addendum D, the distribution of governance and operational responsibilities between the central network and individual school sites is not well defined. The application depends heavily on prospective hiring and future administrative systems rather than exhibiting current readiness, creating vulnerabilities in multi-school governance. Because the applicant failed to demonstrate a successful multi-school operating history, provide a dependable network budget, or submit complete third-party addenda, the addenda section does 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.