



Executive Director's Recommendation Empowerment Academy Nashville 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 Nashville ("sponsor" or "EAN") appealed the denial of its amended application by the Metropolitan Nashville Public Schools ("MNPS") Board of Education to the Commission.

Based on the procedural history, findings of fact, analysis, and Review Committee Recommendation Report, attached hereto, I believe that the decision to deny the Empowerment Academy Nashville 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 Metropolitan Nashville Public Schools Board of Education to deny the amended application for Empowerment Academy Nashville.

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 Nashville 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, 2026, the sponsor submitted a letter of intent to Metropolitan Nashville Public Schools expressing its intention to file a charter school application.
2. The sponsor submitted its initial application for Empowerment Academy Nashville to MNPS on February 2, 2026.
3. MNPS assembled a review committee to review and score the Empowerment Academy Nashville initial application.
4. On March 23, 2026, the MNPS Review Committee conducted a capacity interview with representatives of Empowerment Academy Nashville.
5. The MNPS Review Committee reviewed and scored the Empowerment Academy Nashville initial application, indicating the application lacks evidence of community engagement, clarity surrounding leadership or staffing structures and the application contains conflicting information related to staffing structures and the budget relies on unsupported assumptions, including a significant start-up year deficit, no identified start-up revenue, and no secured grants or fundraising.
6. On April 28, 2026, the MNPS Board of Education voted to deny the Empowerment Academy Nashville initial application.
7. The sponsor amended and resubmitted its application for Empowerment Academy Nashville to MNPS on June 1, 2026.
8. The MNPS Review Committee reviewed and scored the Empowerment Academy Nashville amended application based on the scoring rubric and rated the academic section as partially meets the standard and the operations and finance sections as partially meets the standard.
9. On July 28, 2026, the MNPS Board of Education voted to deny the amended application of Empowerment Academy Nashville.
10. The sponsor appealed the denial of the Empowerment Academy Nashville 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 Nashville amended application using the state's scoring rubric.
12. On September 25, 2026, the Commission staff held a public hearing at Davy Crockett

Tower in Nashville, Tennessee. At the public hearing, the Executive Director, sitting as the Commission's designee, heard presentations from the sponsor and MNPS and received public comment regarding the Empowerment Academy Nashville amended application.

13. The Commission's Review Committee conducted a capacity interview with key members of the Empowerment Academy Nashville 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 Nashville amended application, which served as the basis for the Review Committee Recommendation Report, attached hereto as **Exhibit A**.
15. The Commission staff conducted a full review of the record, which includes the initial and amended applications submitted by the sponsor, documentation submitted by MNPS, and the findings of the public hearing and public comment. The Commission's General Counsel conducted a full review and legal analysis of the record.

FINDINGS OF FACT

Substantial Negative Fiscal Impact Findings and Analysis

At the July 28, 2026 board meeting, the MNPS Board of Education voted to deny the amended application of Empowerment Academy Nashville based on the consideration of the Charter School Review Team's evidence-finding report and the district's Estimated Fiscal Impact Summary, citing a substantial negative fiscal impact to MNPS.

A local board of education may consider whether the establishment of the proposed charter school will have a substantial negative fiscal impact on the LEA such that authorization of the public charter school would be contrary to the best interests of the students, LEA, or community.⁴ When a local school district has denied a charter school application on the basis of substantial negative fiscal impact, Commission Rule 1185-01-01-.01(4) states that, on appeal, the burden is on the district to establish that substantial negative fiscal impact. If there is a finding of substantial negative fiscal impact, the Commission shall not approve the application.⁵ The Commission staff applied the same general methodology used in previous evaluations conducted by the Office of the State Treasurer, the Tennessee State Board of Education, and the Tennessee Public Charter School Commission to determine if a substantial negative fiscal impact

⁴ T.C.A. § 49-13-108(c).

⁵ T.C.A. § 49-13-108(c).

exists in this case. In keeping with the precedent set by these prior analyses, as well as the evidence and testimony presented by MNPS, the Commission considered the district's historical enrollment trends, annual average daily membership ("ADM") fluctuations, and projected enrollment shifts associated with the proposed school approval. The key question is whether the enrollment decline projected by MNPS is materially different from the enrollment gains and losses the district has historically experienced, and whether those shifts are significant enough to constitute a substantial negative fiscal impact.

The following findings are based on information collected by Commission staff from MNPS regarding the substantial negative fiscal impact of Empowerment Academy Nashville:

1. Empowerment Academy Nashville's amended application states that in its first anticipated year of operation (SY 2027-28), the school will enroll a maximum of fifty students in kindergarten through fifth grade; remaining the same at full build-out capacity.⁶
2. Commission staff requested from MNPS the historical trends of projected ADM for the current school year and the actual ADM for three preceding school years. The table below includes actual ADM by year, the MNPS charter school enrollment, the district's projected student growth per year, the actual student growth seen, and the actual percentage growth from the previous year.

Table 1. Historical Average Daily Membership ("ADM") and System Growth⁷

	Actual ADM	MNPS Charter Enrollment⁸	Projected Student Growth	Actual Student Growth	% Growth From Previous Year
SY26-27 (Projected)	78,026	11,969 (15.3%)	2,304	2,304	3.04%
SY 25-26	75,722	12,527 (16.5%)	64	-1,986	-2.56%
SY 24-25	77,708	12,690 (16.3%)	-27	314	0.41%

⁶ Amended Application, pg. 33.

⁷ All data provided by Metropolitan Nashville Public Schools in response to the Commission's August 12, 2026 request for information.

⁸ Charter Fiscal Impact Summary, pg. 4. The included percentages are based on staff calculation of MNPS Charter Enrollment to Actual ADM.

	Actual ADM	MNPS Charter Enrollment ⁸	Projected Student Growth	Actual Student Growth	% Growth From Previous Year
SY 23-24	77,394	13,283 (17.2%)	-178	203	0.26%
SY 22-23	77,191	13,088 (17.0%)	344	344	0.45%

3. In MNPS's analysis, the district identified five schools that would see enrollment decreases because of the opening of Empowerment Academy Nashville.

Table 2. Projected Decrease in ADM Resulting from the Opening of EAN

Impacted School	ADM (SY25-26)	Projected Seats Lost (Year 1)	Projected % ADM Lost (Year 1)	Projected Seats Lost (Build Out)	Projected % ADM Lost (Build Out)
District Schools					
Cockrill ES	266.7	10	3.8%	10	3.8%
Park Avenue ES	255.7	10	3.9%	10	3.9%
Sylvan Park ES	444.3	5	1.1%	5	1.1%
Robert Churchwell ES	244.9	5	2.0%	5	2.0%
Commission School					
Encompass Community School	109.1	10	9.2%	10	9.2%
Other	—	10	—	10	—
Total		50		50	

4. The largest projected Year 1 impact to any district-operated school is approximately 3.9% of ADM, while projected enrollment shifts at other district-operated schools range from 1.1% to 3.8% of ADM. Notably, Encompass Community School, a Commission-authorized public charter school, is projected to experience a Year 1 enrollment impact of 9.2% of ADM.
5. MNPS estimated that the total fiscal impact during Year 1 of Empowerment Academy Nashville's operations would be \$714,794, remaining flat at full build-out. Unlike applications that add grades over time, Empowerment Academy Nashville's projected enrollment remains constant throughout the charter term. The proposed fiscal impact amount is based on the number of projected students multiplied by the estimated per-pupil allocation.

6. In its analysis, MNPS localizes the substantial negative fiscal impact argument to the five identified schools. The district's calculation applies proportional shares based on impacted schools' ADM. These calculations and impacted schools reflect a mix of traditional district schools and Commission-authorized charter schools. This data is reflected in Table 3.

Table 3. Projected Fiscal Impact at Year 1 and at Full Build-Out

Impacted School	Per Pupil Allocation	Fiscal Impact (Year 1)	Fiscal Impact (Build Out)
District Schools			
Cockrill ES	\$18,738	\$187,379	\$187,379
Park Avenue ES	\$17,950	\$179,497	\$179,497
Sylvan Park ES	\$15,641	\$78,206	\$78,206
Robert Churchwell ES	\$17,899	\$89,494	\$89,494
Commission School			
Encompass Community School	\$18,022	\$180,218	\$180,218
Other	—	—	—
Total		\$714,794	\$714,794

7. For the traditional district schools, MNPS's calculation localizes all fiscal impact to the individual schools. However, MNPS's documentation and testimony state that approximately 40% of the per-pupil allocation stays at the central/district office level. Schools, through the district's School-Based Budgeting model, receive approximately 60% of the per-pupil allocation.
8. MNPS stated that fixed costs remain at the central office and school level even when fifty students leave the system.
9. MNPS's budget already reflects the enrollment change of Commission-authorized public charter schools. Therefore, enrollment changes at Commission schools, specifically one charter to another, do not directly affect MNPS's budget. Therefore, including Encompass Community School, a Commission-authorized charter school, within the projected impact calculations may obscure the direct fiscal impact attributable to Empowerment Academy Nashville on district-operated schools and the district's operating budget.

ANALYSIS

After an in-depth analysis, the evidence presented by MNPS does not establish that approving Empowerment Academy Nashville's amended application would have a substantial negative fiscal impact on the LEA, such that authorization would be contrary to the best interests of students, the LEA, or the community. Therefore, I cannot conclude that MNPS has met its

burden of proof under Commission Rule 1185-01-01-.01(4) and T.C.A. § 49-13-108(c).

The crux of the MNPS argument rests on the statutory requirement that districts transfer state and local allocations to a charter school, and the opening and operations of Empowerment Academy Nashville in Year 1 and at full build-out would result in a shifting of approximately \$714,794 in per-pupil funding. For context, the Year 1 projected fiscal impact represents approximately 0.05%⁹ of the district's annual operating budget in Year 1, and the Year 1 enrollment of fifty students represents 0.06% of the district's total enrollment for SY27-28. While the projected fiscal impact remains unchanged at build-out, there is no evidence in the record establishing what percentage of the district's overall operating budget would be affected. As a result, the record does not provide sufficient context to determine whether the projected impact is truly substantial.

In analyzing EAN's fiscal impact, MNPS calculates the district's fiscal impact by multiplying the estimated student enrollment decline for each selected school by its estimated per-pupil allocation. The district's argument relies on the premise that projected enrollment shifts at identified schools are sufficient to establish a substantial negative fiscal impact. Additionally, the district stated that opening EAN would continue to dilute available resources for schools, despite overall district enrollment in MNPS remaining stable at roughly 77,000 students, as shown in Table 1.

The district's analysis leaves several relevant questions unanswered. First, the district failed to present evidence demonstrating that, due to the opening of EAN, the impact would be beyond any enrollment fluctuations within the district. SY2024-25 to SY2025-26 ADM declined by 1,986 students. EAN's Year 1 enrollment is only fifty students. Even assuming all Year 1 EAN students originated from MNPS, the projected enrollment effect would remain substantially smaller than enrollment fluctuations the district has previously experienced. Additionally, MNPS's documents project 3% growth in student enrollment for SY26-27. Historical enrollment figures demonstrate that MNPS has experienced comparable enrollment fluctuations over time.

Furthermore, the district's modeling relies on broad community-level impacts and incorporates other charter options, without clearly articulating how those shifts directly affect the LEA budget or traditional school operations under the School-Based Budgeting model. The district assumes that the total Tennessee Investment in Student Achievement ("TISA") amount contained in Table 3 represents a direct reduction to individual school budgets, yet district documentation and public hearing statements clarify that these figures do not reflect the actual amounts individual schools might lose. On average, only a portion of total TISA funding is

⁹ MNPS Fiscal Year 2026-27 Operating Budget, June 23, 2026, pg. 2.

distributed directly to schools through Student-Based Budgeting (“SBB”), with the remainder invested centrally. MNPS's fiscal impact calculations did not distinguish between the portion of funding distributed through School-Based Budgeting and the portion retained for district-level expenditures. Based on district testimony regarding SBB allocations, the projected school-level impact may be lower than the gross per-pupil allocation figures presented in the district's analysis. However, MNPS did not calculate an actual projected fiscal impact on schools because the district used the full per-pupil allocation in its evidence.

To support the Commission’s analysis of the evidence, Commission staff applied the district’s testimony to the Year 1 fiscal impact figures provided by the district. This calculation reduces the impact on a school’s revenue by 40%, aligning with how MNPS’s per-pupil funding is distributed through School-Based Budgeting.

Table 4 Estimated School-Level Fiscal Impact Based on School-Based Budgeting Allocation

Impacted District School (Non-Charter)	Fiscal Impact (Year 1) Full PPA	SBB Revenue Amount (60% of PPA)
Cockrill ES	\$187,379	\$112,427
Park Avenue ES	\$179,497	\$107,698
Sylvan Park ES	\$78,206	\$46,924
Robert Churchwell ES	\$89,494	\$53,696
Total	\$534,577	\$320,745

Based on MNPS's testimony that approximately 60% of TISA funding is distributed through School-Based Budgeting, the projected school-level impact shown in Table 4 would be approximately \$320,745 across four schools. MNPS does not present evidence that this reduced amount has a substantial negative fiscal impact on the schools. While MNPS asserts that certain costs are fixed, the district did not quantify those expenditures or demonstrate how they translate into a substantial negative fiscal impact attributable to EAN. While the district attempts to localize the impact of opening a charter school to specific schools, the evidence presented does not establish that the projected fiscal effect amounts to a substantial negative fiscal impact on the district.

The Commission also considered whether projected impacts on individual schools demonstrate a substantial negative fiscal impact on the LEA. While the potential impact on individual schools is acknowledged, evidence demonstrating a substantial negative fiscal impact for a district serving approximately 77,000 students cannot be limited to impacts at one or more schools. The statutory question is whether the district has demonstrated a substantial negative fiscal impact on the LEA as a whole.

Moreover, the district's full build-out projections assume the school reaches maximum enrollment, and that current fiscal and enrollment conditions remain unchanged throughout the projection period. Table 5 reflects a steady increase in MNPS's total per-pupil allocation, which is a combination of state and local funding, over recent years.

Table 5. Total Per Pupil Allocation¹⁰

	Total State and Local TISA Revenue
SY2026-27 (Projected)	\$17,432
SY2025-26*	\$17,356
SY2024-25	\$15,307
SY2023-24	\$14,640

*awaiting final true up.

In the aggregate, MNPS has not provided rigorous, direct evidence to meet the statutory burden of proving a substantial negative fiscal impact. The Tennessee legislature uses the term “substantial, negative fiscal impact” but does not define those terms in the statute. Where keywords are not defined, words are given their usual and accepted meaning. Substantial is defined as considerable in quantity; significantly great.¹¹ Based on the plain language definition, to meet the bar of being considered substantially negative, the fiscal impact of opening a charter school must rise above and beyond normal systemic fluctuations. The district also argues that additional charter schools affect the broader public-school ecosystem. However, that consideration is distinct from the statutory requirement that the district establish a substantial negative fiscal impact. The Commission, as an appellate body, regularly analyzes the impact on the surrounding community when acting on a new start application, a renewal application, or a revocation. The Commission is cognizant that its decisions, as with all authorizers’ decisions, impact students, families, and schools in the community.

However, that analysis is separate from the one required to prove a substantial negative fiscal impact in accordance with the statute. Because the district has historically managed normal enrollment shifts and benefits from broader funding growth, the evidence provided by MNPS does not substantiate a finding that the approval of Empowerment Academy Nashville will cause a substantial negative fiscal impact such that authorization would be contrary to the best interests of students, the LEA, or the community.

¹⁰ Tennessee Department of Education Payments to the Charter Commission

¹¹ Substantial, Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/substantial> (last visited Sept. 29. 2026).

District Denial of Initial Application

The Review Committee assembled by Metropolitan Nashville Public Schools to review and score the Empowerment Academy Nashville initial application consisted of the following individuals:

Name	Title
Codarrell Cobb	Resource Strategy Coordinator
Ryan Latimer	Director of Boundary Planning and Enrollment Forecasting
Casey Megow	Executive Director of Facility Maintenance and Construction
Dr. Sudhir Sinha	Data Coach
Ken Stark	Executive Officer of Operations
Dr. Bill Warren	External Interviewer
Dr. David Williams	Deputy Chief Academics

The Empowerment Academy Nashville initial application received the following ratings from the MNPS 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	Partially Meets Standard

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

District Denial of Amended Application

The Review Committee assembled by MNPS to review and score the Empowerment Academy Nashville amended application mirrored that of the review committee that reviewed the initial application. Upon resubmission, the MNPS Review Committee conducted a review of the amended application, and the amended application received the following ratings from the MNPS Review Committee:

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

Commission Review Committee's Evaluation of the Application

Following the denial of the Empowerment Academy Nashville 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 Nashville 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
Jeff Wasbes	External Consultant

The Commission's Review Committee conducted an initial review and scoring of the Empowerment Academy Nashville 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 Nashville 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 Nashville because the applicant failed to provide sufficient evidence in the academic, operational, and financial 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 multiple weaknesses in academic planning, instructional design, services for special populations, and community demand. The proposed educational model lacks sufficient detail

regarding implementation, particularly how the intended fifty-student structure will operate in practice. Concerns were further reinforced during the capacity interview, where leadership offered inconsistent explanations related to instructional delivery and the role of instructional assistants. While the application proposes an agriculture-centered science, technology, engineering, and mathematics (“STEM”) focus, this theme is not effectively integrated throughout the academic program, and the assessment framework lacks sufficient specificity. Additionally, plans for serving students with disabilities and English learners are underdeveloped, staffing and budget assumptions are not consistently aligned, and several key program components depend on uncertain funding sources and unidentified service providers. Evidence of community engagement was limited and relied primarily on materials associated with a Memphis-based summer program, providing little indication of sustained outreach or demonstrated family interest in Nashville.

The applicant’s Operations Plan and Capacity does not meet the standard due to concerns related to governance, leadership, organizational structure, facilities planning, and staffing readiness. During the capacity interview, board members demonstrated an inconsistent understanding of board composition, individual responsibilities, and oversight obligations, raising concerns about the board’s ability to govern a growing network and support expansion into multiple locations. The board was also unable to clearly describe a compliant process for selecting a statutory parent representative. Reporting structures among the governing board, network leadership, and school-level staff remain unclear, while several critical leadership positions, including the chief executive officer (“CEO”) and chief financial officer (“CFO”), remain vacant or contingent upon future funding. Facility plans lack documented timelines, evidence of completed due diligence, Americans with Disabilities Act (“ADA”)-related planning, and formal site agreements. Furthermore, the absence of a demonstrated staffing pipeline raises additional concerns regarding operational preparedness.

The applicant’s Budget and Finance section does not meet the standard because the financial plan contains inconsistencies, unsupported assumptions, and limited evidence of fiscal capacity. The budget relies heavily on unawarded start-up grant funding and informal financial support from the board president to address anticipated deficits. It does not present a sustainable long-term financial model. Several major expenditures, including food service, technology, and required special populations staffing, appear omitted or substantially underfunded, and compensation projections do not align with stated commitments to competitive salaries. In addition, key financial leadership positions remain unfilled, accounting resources appear insufficient, and financial oversight and procurement procedures are not fully developed. As presented, the financial plan does not adequately account for multi-campus operations or provide convincing evidence of long-term fiscal viability.

The applicant's Addenda do not meet the standard because they fail to demonstrate capacity to operate multiple schools, a sustainable network financial structure, or adequate documentation related to third-party management. The organization has not established a track record of successfully opening or managing multiple charter schools, making the proposal to launch three campuses simultaneously in separate markets difficult to substantiate. During the capacity interview, representatives offered general assurances regarding expansion plans but did not provide detailed implementation strategies. In addition, the network budget contains inconsistencies involving shared-service allocations, personnel expenses, and hiring timelines, and it does not clearly align central-office costs with projected enrollment growth. The education service provider ("ESP") addendum is also incomplete, lacking an identified provider, a draft management agreement, and a transparent selection process. Collectively, these deficiencies prevent the applicant from demonstrating the organizational readiness, financial sustainability, and operational capacity necessary to support the proposed expansion and simultaneous launch of multiple schools in different regions.

For the aforementioned reasons, the Review Committee found that the sponsor did not meet or exceed the standard for approval based on the state board's scoring rubric.

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

Public Hearing

Pursuant to statute¹² and Commission Policy 2.000, a public hearing chaired by the Executive Director was held on September 25, 2026. Representatives from Metropolitan Nashville Public 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. MNPS explained that the amended application was reviewed by trained reviewers with expertise in academics, operations, finance, facilities, special populations, and charter school oversight using the State Board scoring rubric. Representatives from MNPS indicated that the Empowerment Academy Nashville amended application was denied because concerns remained regarding the educational program, operational readiness, financial sustainability, and organizational capacity. Specific concerns cited by the district included insufficient evidence of demand for the proposed boys-only school model, inconsistencies regarding enrollment and recruitment projections, limited detail related to curriculum implementation and special populations, questions regarding leadership and

¹² T.C.A. § 49-13-108.

governance capacity, operational readiness concerns associated with opening multiple schools simultaneously, and unresolved financial assumptions related to facilities and start-up costs. MNPS also discussed its substantial negative fiscal impact determination. The district estimated that the proposed school would result in approximately \$714,794 in annual funding shifting from existing schools beginning in Year 1. According to the district, enrollment shifts would affect several nearby schools and reduce resources available for student services, staffing, and district-supported programs. The district concluded that the application did not meet the requirements for approval and requested that the Commission uphold the denial decision.

In the sponsor's opening statement, representatives from Empowerment Academy Nashville focused their presentation on the educational needs of elementary-aged boys in West Nashville and the community demand that led to the development of the proposed school. The applicant described a summer enrichment program that originated after parents expressed concerns regarding academic performance and requested additional educational opportunities for their children. According to the applicant, community outreach and surveys conducted following the summer program demonstrated interest in a school designed to provide additional academic support and individualized attention for boys. The applicant disputed several of the district's findings, asserting that the application contained evidence of community demand, facility plans, staffing resources, and financial supports. Representatives stated that they had secured a facility, identified prospective students, and established partnerships that would support implementation of the proposed model. The applicant also emphasized the experience of board members and volunteers involved in developing the proposal and maintained that the governing board possessed the capacity necessary to operate the school successfully. Empowerment Academy described a boys-only kindergarten through fifth grade model centered on literacy, mathematics, STEM instruction, and agriculture-based learning opportunities. The applicant stated that the proposed school would provide individualized supports, hands-on learning opportunities, and strong community engagement while serving students who need additional academic assistance and educational opportunities.

During questioning by the Commission, district representatives were asked about the review process, concerns regarding the applicant's proposal to open schools in multiple districts simultaneously, financial assumptions, and the district's substantial negative fiscal impact determination. MNPS explained that reviewers were selected based on expertise in academics, operations, finance, and special populations and participated in training on the State Board rubric prior to conducting individual reviews and capacity interviews. Commission members also questioned the district regarding concerns about the applicant's ability to successfully and simultaneously open schools in Nashville, Memphis, and Chattanooga. MNPS stated that reviewers identified concerns related to governance capacity, leadership experience, staffing,

facilities readiness, and overall implementation planning and concluded that the application did not sufficiently demonstrate the capacity necessary to launch and oversee multiple schools across different regions. Additional discussion focused on financial sustainability and fiscal impact. The district stated that reviewers identified concerns regarding facilities expenses, start-up costs, Year 0 funding sources, and other budget assumptions. MNPS further explained that projected enrollment shifts from nearby schools would result in a loss of funding that the district determined met the threshold for a substantial negative fiscal impact.

The Commission then questioned the sponsor regarding the need for the proposed school, the rationale for selecting West Nashville as the proposed location, the agriculture-focused academic model, the proposal to open schools in three districts simultaneously, and the applicant's financial assumptions. The sponsor explained that the proposed school originated from a summer enrichment program developed in response to community concerns about educational opportunities for local students. Representatives stated that parent feedback, community outreach, and enrollment interest demonstrated demand for the proposed boys-only school model. Commission staff also asked about the agriculture and STEM focus of the school. The applicant explained that the model would integrate agriculture, literacy, mathematics, and science through hands-on learning experiences and community partnerships designed to increase student engagement and exposure to career opportunities. The Commission further questioned the sponsor regarding its ability to support schools in multiple districts simultaneously. In response, the applicant pointed to the experience of its governing board, partnerships through the African Methodist Episcopal ("AME") Church network, and support from community organizations as evidence of organizational capacity. The sponsor also stated that start-up funding and operational support would be provided by board members, donors, and partner churches and maintained that sufficient resources were available to support implementation of the proposed school.

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

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.”¹³ 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 Nashville 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 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 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.”¹⁴ 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 Nashville 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.

I agree with the Review Committee that the application does not meet the standard for approval in the Educational Program Design and Capacity section. While the educational plans for Empowerment Academy Nashville are guided by a unique mission to serve economically disadvantaged male students in a small educational setting, the proposed academic model

¹³ T.C.A. § 49-13-108.

¹⁴ T.C.A. § 49-13-102.

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. The sponsor pointed to community demand as the driver behind the submission of this application for approval. The sponsor raised the issue of low proficiency scores during the public hearing, highlighting a desire to create an option for families to raise these results in particularly disadvantaged neighborhoods. But an application meets the standard for approval if the community demand includes broad outreach across demographics to families, community members, stakeholders with the targeted community. During the capacity interview and the public hearing, the sponsor explained that Empowerment Academy was created as a joint venture with the AME Church. The sponsor emphasized the 2025 summer enrichment program as evidence of community demand. The sponsor stated that the summer program had a total of thirty-two students over the course of two sessions and as of the public hearing date, there were fifty-two intents to enroll. However, details of the intents to enroll and information about the Nashville summer programs are not detailed in the application.

The sponsor further stated during the capacity interview that, based on the summer enrichment program, they are aware that some of the potential enrolling students would require special services, and the sponsor would contract with an external provider for those services. However, the application does not identify any external providers, nor does the budget reflect a plan to fund these services. Additionally, the application does not detail a staffing plan or school schedule to ensure these students are receiving services in compliance with state and federal law. The application also identifies few members of the founding team, as certain people were also identified as board members throughout the appeal process. For reasons expounded upon in this analysis, the lack of clarity in leadership for Empowerment Academy Nashville affects both the education and operations plans; therefore, neither plan can meet the standard for approval.

Operationally, I find that the application does not meet the approval standard, as there are several substantial gaps in the sponsor's governance plan. The sponsor's governing board continued to evolve throughout the appellate process – a fact that is not dispositive of the application alone. However, the evolution did not provide clarity to the board but instead raised more questions about the board's capacity to provide oversight to Empowerment Academy Nashville. At each opportunity provided to the sponsor to identify board members, the sponsor identified new and/or different individuals for the board. Some members were introduced as board members in the public hearing, but there is no information in the application to assess

their capacity for governance. It is critically important for the Commission to be clear on a governing board and its members, as well as their expertise for the position they would hold, as it is the governing board that holds the legal relationship of the charter agreement if approved.

Based on the information in the application and provided during the public hearing, each board member of Empowerment Academy Nashville is expected to contribute \$50,000 in money or services as stated in the board's bylaws. The board attorney indicated during the capacity interview that conflicts would be avoided as any member affiliated with the church entity would not participate in discussions or votes on those agenda items. However, this is not feasible in practice as the sponsor intends to use the AME Church location as the school's facility site and testified during the public hearing that the AME Church is an integral part of the school's community and support. Therefore, it is not realistic to recuse board members from meeting votes and maintain impartiality. The use of a church as a facility for a charter school is not dispositive of the application alone. However, there needs to be clear roles and responsibilities between the charter school and the entity it is contracting with, including no potential or perceived conflicts of interest.

Additionally, during the public hearing the sponsor named St. Luke AME Church as the intended facility for Empowerment Academy Nashville. But the sponsor did not provide any evidence to substantiate that testimony, nor did the sponsor present an memorandum of understanding ("MOU") or letter of intent regarding this site's use as a school. Without such information, I cannot determine what, if any, terms and/or conditions are associated with this facility. This facility plan does not meet the standard, as there is no evidence that the facility is aligned with the school's instructional model, that it can accommodate potential enrollment growth, or that it meets legal and practical requirements for use.

Further, the sponsor did not provide sufficient evidence in support of its school staffing plan. The application indicates that network leadership services provide strategic direction, compliance oversight, and operational support. Further, the sponsor names the school director as leading the daily operations of the school site. The sponsor also indicated that the school would have three lead teachers and would be supported by three instructional teaching assistants. However, this information is not reflected in the budget provided. The sponsor's application provides general strategies for recruiting and retaining teachers. However, to meet the standard for approval, a plan should provide a multi-faceted, proactive plan, and as submitted, this 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. 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 as the proposed head of schools is based in Memphis, and the funding for the intended touchpoints is not supported by the budget.

I agree with the Review Committee that the financial plan 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. When questioned during the public hearing about Year 0 funding sources, the sponsor testified that all personnel would work on a volunteer basis until the first TISA payments are issued, if approved. However, the application does not support this assertion. In fact, the application and budget include salaries for key members of the network and school site staff. These inconsistencies underscore the financial plan's lack of readiness for approval.

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 well 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 even a single school without consideration of network implications.

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 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, 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.

Part of the Commission's responsibility as a statewide appellate authorizer includes considering the effects of its charter school application approvals on local educational ecosystems. The Commission understands and regularly discusses how opening a new school will affect the intended community. This discussion includes the availability and quality of current options, enrollment trends, and demonstrated demand. While this is not a specific indicator in statute or in the State Board of Education's scoring rubric, this is always a consideration when evaluating the best interest of the students, the LEA, or the community.

For the reasons expounded in this report, I recommend that the Commission deny the Empowerment Academy Nashville 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 Nashville was contrary to the best interests of the students, the LEA, or community. Therefore, I recommend that the Commission affirm the decision of the MNPS Board of Education to deny the amended application for Empowerment Academy Nashville.



Tess S. Stovall

Tess Stovall, Executive Director
Tennessee Public Charter School Commission

October 9, 2026

Date



EXHIBIT A:
Charter Application Review Committee Recommendation Report

October 9, 2026

School Name: Empowerment Academy Nashville

Sponsor: Empowerment Academy

Proposed Location of School: Metropolitan Nashville Public 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 Design and Capacity, and 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 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 Nashville

Sponsor: Empowerment Academy

Proposed Location of School: Metropolitan Nashville Public Schools

Mission: Empowerment Academy Nashville (“EAN”) 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. EAN 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 Nashville and serve students in kindergarten through fifth grade. The school, Empowerment Academy

⁴ Empowerment Academy Nashville Amended Application, pg. 12

⁵ Empowerment Academy Nashville Amended Application, pg. 21

Nashville (“EAN”), 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, though the vendor has not yet been identified.⁶ The school intends to operate in the city of Nashville in Davidson County 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 an opportunity for students in the city of Nashville 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 Nashville has budgeted \$315,571 the Charter Schools Program (“CSP”) grant and board president contributions and projects and projects \$226,756 in expenses for the school. In Year 1, Empowerment Academy Nashville projects the school will have \$1,259,700 in revenue and \$815,037 in expenses, resulting in a balance of \$444,663. By Year 5, the school projects to have \$1,208,200 in revenue and \$802,787 in expenses, resulting in a positive ending fund balance of \$2,001,313.⁸ 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.⁹

⁶ Empowerment Academy Nashville Amended Application, pg. 12

⁷ Empowerment Academy Nashville Amended Application, pg. 17

⁸ Empowerment Academy Nashville Amended Budget

⁹ Empowerment Academy Nashville Amended Application, pg. 24

Summary of the Evaluation

The Review Committee recommends the denial of the amended application for Empowerment Academy Nashville 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, services for special populations, and a lack of verifiable student interest in Nashville. The application presents an underdeveloped educational framework and fails to clearly explain how the proposed fifty-student model will be implemented. These concerns were reinforced during the capacity interview, where leadership provided inconsistent explanations regarding instructional delivery and the role of instructional assistants in leading content. Additionally, the proposed agriculture-focused science, technology, engineering, and mathematics ("STEM") model is not meaningfully integrated into the broader educational program, and the assessment framework lacks sufficient detail and rigor. The application also fails to provide adequate operational planning for serving students with disabilities and English learners, includes inconsistencies between staffing and budget assumptions, and relies on uncertain future funding sources and unidentified providers to support key program components. Evidence of community engagement within the application included materials almost entirely from a Memphis-based camp and did not demonstrate continued family engagement.

The applicant's Operations Plan and Capacity does not meet the standard due to concerns regarding governance, leadership, organizational structure, facilities, and staffing readiness. During the capacity interview, the governing board demonstrated an inconsistent understanding of its membership, roles, and oversight responsibilities, raising concerns about its ability to effectively govern the proposed network and oversee expansion across multiple markets. The board also failed to clearly articulate a compliant process for selecting a statutory parent representative. Reporting relationships among the board, network leadership, and school-level personnel remain unclear, and critical executive positions, including the chief executive officer ("CEO") and chief financial officer ("CFO"), are vacant or contingent upon future funding. Furthermore, facility plans lack sufficient documentation, verified timelines, evidence of Americans with Disabilities Act ("ADA")-related due diligence, and formal agreements for proposed sites, while the absence of a demonstrated staffing pipeline further undermines confidence in the organization's operational readiness.

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 fiscal capacity. The proposed budget relies heavily on unawarded start-up grant funding and informal financial support from the board president to address projected operating deficits rather than demonstrating a sustainable financial model. Several critical expenses, including food service, technology, and required special education staffing, appear omitted or significantly underfunded, and salary projections do not align with narrative commitments to competitive compensation. Additionally, key financial oversight positions such as the CFO remain unfilled, accounting services appear inadequately funded, and financial monitoring and procurement practices are not fully developed. As presented, the budget does not adequately reconcile multi-campus costs or provide sufficient evidence of long-term fiscal solvency.

The applicant's Addenda do not meet the standard because they fail to demonstrate sufficient multi-school operating capacity, a viable network financial model, and adequate third-party management documentation. The organization has no demonstrated track record of successfully opening or managing multiple charter schools, making the proposal to launch three campuses simultaneously across separate markets difficult to substantiate. During the capacity interview, representatives provided general assurances regarding expansion but did not present detailed strategies for implementation. The network budget contains inconsistencies related to shared-service allocations, personnel costs, and hiring timelines, and does not clearly reconcile central-office expenditures with projected enrollment growth. Additionally, the education service provider ("ESP") addendum is incomplete, lacking a designated provider, draft management agreement, and transparent selection process. Collectively, these deficiencies prevent the applicant from demonstrating the organizational readiness, financial sustainability, and operational capacity necessary to support the proposed network expansion.

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 unclear academic structures, insufficient plans for special populations, and a lack of verified community demand in Nashville.

The academic plan is underdeveloped and does not provide the detail needed for successful implementation of the educational program. The rubric requires a cohesive instructional program, but the application does not clearly articulate how the educational elements are integrated together. The application does not explain how a single teacher and assistant will deliver grade-level standards with multi-grade classroom bands (e.g., K-1, 2-3, 4-5). The narrative does not outline daily instructional routines or how distinct curricula will be taught at the same time for different grade levels. In the capacity interview, the leadership team gave conflicting explanations about instructional assistants delivering grade-level content independently rather than leading small groups as described within the application materials, reinforcing that the academic model lacks coherence.

The integration of agriculture and STEM is also unclear. While agriculture is described as a core feature, the applicant did not show how it connects to grade-level standards or supports academic outcomes. The application materials and capacity interview do not describe what students will do in daily lessons or how STEM and agricultural activities tie to literacy and other measures. While some of the team members named within the application have instructional backgrounds, these individuals did not demonstrate capacity to implement this model. The proposed school leader does not have an instructional or instructional leadership background, and with the network academic leader based in Memphis, questions arise as to how teachers will receive critical instructional guidance on a day-to-day basis.

The applicant did not present clear academic goals or a functional assessment strategy. During the capacity interview, the team could not explain how assessments would be used to set measurable goals, track progress, or guide instruction. Although several assessments were mentioned and the proposed board president named her preferred test, the applicant did not show understanding of how the tests fit within a comprehensive system of meaningfully monitoring student performance. These assessments were also not accounted for in the budget materials.

Major gaps exist in the plan for serving special populations. The rubric requires a clear and compliant plan for identifying and supporting students with disabilities and English learners.

The applicant did not show adequate knowledge of Individuals with Disabilities Education Act (“IDEA”) or state rules and did not describe how services would be provided on day one. The budget does not include required staff to serve students with disabilities or English learners. The team stated that hiring would occur only after revenue becomes available, but these plans are speculative and not reflected in the submitted budget. The applicant also gave inconsistent answers regarding whether services would be provided in-house or through vendors, and no vendors had been identified and payment for vendors was severely underfunded within the budget template. These contradictions show the applicant has not demonstrated the capacity to meet mandatory requirements for serving special populations.

The applicant also did not provide Nashville-specific evidence of community demand. The rubric expects clear local support, but the applicant relied on Memphis-based summer pilots that occurred in 2025 rather than unique outreach to Nashville families. The application materials included reference to a Nashville-based camp within the narrative of the application, yet no evidence of the camp was included within application attachments. During the capacity interview, the applicant stated that a camp occurred in Nashville with thirty-two total students between two sessions, but this could not be verified by the Review Committee. The proposed school director stated she has been working on canvassing in North Nashville and to date had accumulated fifty-two intents to enroll from families. This was also not able to be verified by the review committee within the application materials. Without verified demand, the applicant has not shown that enrollment projections are justified.

Because the academic design, assessment plan, special population strategy, and community demand evidence are insufficient and misaligned with rubric expectations, 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 major gaps in governance, organizational structure, leadership capacity, staffing readiness, and a lack of operational preparation for a multi-campus launch.

There is a lack of clarity regarding the governing board's composition, structure, and capacity. The application and capacity interview provided conflicting information about who serves on the board, member roles, and oversight responsibilities. Board members named in the application did not match those identified during the capacity interview, and the team struggled to identify officers or explain governance duties. The written application provided insufficient descriptions of the roles and responsibilities for each board member, or the governing board as a whole. The interview substantiated the lack of evidence in the application when the board members present in the interview were unable to describe their understanding of their responsibilities, instead deferring to descriptions provided by the board chair. Because of this uncertainty, it is not clear how the board assessed its capacity to oversee three campuses in separate regions and to launch these campuses concurrently. This lack of clarity and over-reliance on a single board member align with the rubric criteria for failing to present accurate board membership information or clear responsibilities.

The applicant also did not meet the rubric requirement for a statutory parent representative. The team could not explain how the position would be filled or how the board's \$50,000 annual contribution requirement would apply. As it currently stands, a contribution is required of all members, although one board member stated that the rule would be revised to exempt the parent from participation. Although the application stated the school would ensure a parent board member is identified, no process for identifying, recruiting, or selecting the parent representative was described.

The operational structure of the school and board is not clearly defined. The relationship between the board, the proposed network office, and school-level leadership remains unclear. Various individuals were initially named as board members who were later stated to be part of the network or part of individual school leadership. Board members introduced within the capacity interview were not mentioned within the application materials. Lines of authority for hiring, financial management, contracting, and compliance were not established. Key network roles, including CEO and CFO, remain vacant or tied to future funding. The applicant did not clarify which operational tasks—such as daily administration, special populations compliance,

student safety, and data monitoring—would be handled centrally versus at each campus level. The proposed rotation model for network support lacks schedules or protocols, leaving campus directors without dependable on-site operational assistance. During the interview, the team could not explain basic reporting lines, demonstrating a lack of operational clarity required by the rubric.

Leadership capacity remains insufficient. Executive positions are unfilled, and hiring is contingent on future funding. The operational plan did not clearly define which roles are to be executed at the network level and which will be left to individual schools. The named principal candidate does not have direct experience in a leadership role with demonstrated success in raising student achievement, managing instructional programs, and developing and evaluating a staff. Launching three campuses without a confirmed leadership team and with a leader who does not have proven educational experience indicates unrealistic planning and inadequate operational readiness. The CEO and CFO roles also remain unfilled, raising concerns about the network team's capacity to support multiple school openings simultaneously. Lacking these key positions and lacking funding to support them demonstrates an inability to launch multiple schools simultaneously.

The facility plan also does not meet the standard. Although the applicant referenced memoranda of understanding (“MOUs”) with church sites, no formal agreements, verified timelines, or clear renovation responsibilities were provided. Cost estimates were inconsistent across documents, and the applicant did not demonstrate understanding of zoning, occupancy, or ADA requirements. Backup facilities were described only at a high level, with no evidence of due diligence. As a result, the plan does not show clear progress, defined responsibilities, or alignment with projected enrollment.

The staffing plan as laid out in the application is not viable. The rubric requires specific strategies to recruit and retain licensed teachers. The application provides general statements about outreach without giving specific information. The application does not identify concrete pipelines, partnerships, or regional recruitment sources. Given the specialized multi-grade classroom model, the lack of a clear staffing pipeline raises major risks in meeting licensure and endorsement requirements at opening.

Because of these deficiencies in governance, organizational structure, leadership capacity, facilities planning, and staffing readiness, the Operations Plan and Capacity 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 due to major inconsistencies, unsupported assumptions, and insufficient evidence of internal financial capacity.

The operating budget and budget narrative do not align with each other or with the application narrative. The rubric requires revenue and expense categories to be consistent and supported by reasonable, transparent projections. However, the submitted budget relies heavily on uncommitted federal funds, including \$1.2 million in the unawarded CSP start-up grant. Without these funds, the school would face significant Year 0 and Year 1 shortfalls. When asked how these expenses would be covered without the CSP grant, the board president stated she would personally fund early operations. While this generosity is noted, the rubric requires a solvent, sustainable, and verifiable budget with formal contingency plans, not informal personal contributions.

Several essential operational categories are omitted or underfunded, including food service, technology infrastructure, student assessments, professional development, and student insurance. Specific areas that remain unfunded within the budget such as professional development, technology, and student assessments are key to ensuring alignment with the school's academic model. Areas such as student assessment are critical to tracking student progress, and professional development is integral, especially when noting that the proposed school director does not have instructional experience. Without these items, the school would be unable to implement its academic model. Although the narrative promises competitive compensation, step increases, retention bonuses, and comprehensive benefits, the five-year budget keeps salaries flat and does not increase yearly. It also fails to fund required positions, such as certified special education and English learner teachers. This creates a misalignment between the educational model and financial allocations.

The totality of the evidence presented in the proposed budget, the budget narrative, and capacity interview demonstrate the board and leadership team possess insufficient experience to successfully operate and maintain the school's fiscal and financial health. Key financial leadership positions remain vacant, and the applicant confirmed that hiring a CFO would be delayed until funding is available. As a result, no qualified personnel are identified to manage daily accounting, payroll, vendor compliance, or fiscal reporting. The applicant plans to contract out back-office services, but the budget does not allocate enough funds for these services, and



the narrative does not provide procurement thresholds or a vetting process for selecting a provider, as required by the rubric.

The financial policies included in the application are incomplete and overly broad. Procedures for idle funds, purchasing, and travel do not identify required approval authorities or monetary thresholds. The financial monitoring framework lacks phase-specific intervention triggers to help the board respond to deficits or operational strain. During the interview, the applicant could not clearly explain how the school would operate sustainably if only one campus were approved, and provided inconsistent descriptions of how shared service costs and central office responsibilities would be adjusted. The network-level and school-level budgets also do not reconcile centralized service fees and cost allocations, creating additional concerns about long-term solvency.

Because the applicant did not present a solvent and supportable operating budget or demonstrate sufficient internal financial capacity, the Budget and Finance section 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 they do not demonstrate multi-school operating experience, do not present a viable network financial model, and include an incomplete ESP addendum.

The rubric requires applicants proposing a multi-school network to show a realistic five-year growth plan, a proven record of opening and managing multiple schools, and a network budget with well-supported assumptions. Addendum B and Addendum D do not provide this evidence. The applicant does not have a documented track record of launching or managing one or multiple schools. Proposing three new campuses across Chattanooga, Nashville, and Memphis without prior scaling experience or a seasoned management team reflects an unrealistic assessment of organizational capacity. During the capacity interview, representatives could not explain how they would manage simultaneous openings in three regions and provided general statements rather than actionable plans and provided unrealistic travel plans for network staff located across the state. This demonstrates a lack of network-level readiness.

The network budget and shared-services model also do not meet rubric expectations. The rubric requires a complete and reliable network budget that demonstrates financial viability. Instead, the submitted budget contains minimal detail and significant inconsistencies between the written narrative, interview responses, and budget materials. The application lists guaranteed salaries for network staff, yet leadership stated that hiring and compensation would depend entirely on enrollment outcomes and which campuses open. Additionally, different salaries are named across all application documents. This contradiction makes it impossible for the review committee to determine how the network will operate. When asked to explain shared-service fees, personnel costs, and allocation methods, leadership could not provide a clear methodology. These gaps indicate that the network budget is neither coherent nor viable.

Addendum C, which addresses the third-party ESP, is incomplete. The applicant did not identify an ESP, provide a draft management agreement, outline performance metrics, or describe a transparent selection process. Without a named provider, the review committee cannot evaluate the ESP's academic track record, financial systems, or ability to support the

proposed network. The applicant could not provide additional information during the interview, leaving all ESP-related structures unverified.

Across Addendum B and Addendum D, ownership of key operational and governance functions is not clearly defined. The responses rely heavily on future hiring and future systems rather than demonstrating current readiness. As a result, the applicant does not show how network operations, governance oversight, or campus-level responsibilities will be managed effectively across multiple schools.

Because the applicant did not demonstrate multi-school operating experience, did not present a viable and reconciled network financial model, and did not provide complete or compliant addenda, the Addenda section does not meet the standard for approval.



Evaluation Team

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

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.

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.