



Executive Director's Findings and Recommendation

Amendment Appeal for KA @ The Crossings

Pursuant to Tennessee Code Annotated (T.C.A.) § 49-13-110(d) and Commission rule 1185-01-01-.04, a charter school that has its petition to amend its charter agreement denied by its charter school authorizer, the charter school may appeal the denial to the Tennessee Public Charter School Commission ("Commission"). On May 4, 2022, Knowledge Academies ("KA" or "operator"), the governing board of KA @ The Crossings, appealed the denial of its amendment petition by the Metro Nashville Public School ("MNPS") Board of Education to the Commission. Based on the procedural history, findings of fact, and analysis, I believe that the decision to deny the KA @ The Crossings' amendment petition was not in the best interest of the students, local education agency (LEA), or community. Therefore, I recommend that the Commission overturn the decision of the MNPS Board of Education to deny the petition to amend the KA @ The Crossings' charter agreement.

STANDARD OF REVIEW

Pursuant to Commission rule 1185-01-01-.04, Commission staff conducted a review of the documentation included in the notice of appeal and the decision to deny the amendment petition, including additional information gathered by Commission staff. Additionally, the Commission held a virtual public hearing.

In order to overturn the decision of the local board of education, the Commission must find that the local board's decision to deny the charter amendment petition was contrary to the best interests of the students, LEA, or community. In this case, the Commission can uphold the MNPS decision to deny the amendment petition or overturn the decision of MNPS and remand the decision to MNPS with written instructions for approval of the amendment. MNPS shall remain the charter school authorizer.

PROCEDURAL HISTORY

1. On May 24, 2011, MNPS approved the charter application for KA to open Knowledge Academy Middle serving grades 5 through 8. The term of the agreement allowed for a maximum enrollment of 272 and expires on June 30, 2022.
3. KA began operation of Knowledge Academy Middle at the start of the 2012-2013 school year, serving grades 5 and 6.
2. On June 24, 2014, MNPS approved the charter application for KA to open Knowledge Academy High School serving grades 9 through 12. The term of the agreement allowed for a maximum enrollment of 440 and expires on June 30, 2025.
4. KA began operation of Knowledge Academy High School at the start of the 2015-16 school year, serving grade 9.
3. On June 23, 2015, MNPS approved the charter application for KA to open KA @ The Crossings serving grades 5 through 8. The term of the agreement allowed for a maximum enrollment of 400 and expires on June 30, 2026.



5. KA began operation of KA @ The Crossings at the start of the 2016-17 school year, serving grades 5 through 8.
6. On April 2, 2019, the governing board of Knowledge Academies signed a charter management agreement with Noble Education Initiative ("NEI"). The agreement was for NEI to operate the three (3) schools overseen by the governing board: Knowledge Academy Middle, KA @ The Crossings, and Knowledge Academy High School.
7. On April 26, 2019, the MNPS Office of Charter Schools issued a notice of concern to the Knowledge Academies, Inc. governing board, citing a number of items of concern with the network.
8. On April 29, 2019, the governing board submitted the signed management agreement with NEI to the MNPS Office of Charter Schools for review.
9. On June 12, 2019, the MNPS Office of Charter Schools sent the governing board a letter relating to the notice of intent to recommend revocation of the charter agreements for the three (3) schools operated by the governing board.
10. On June 26, 2019, Chancellor Anne Martin, Davidson County Chancery Court, issued a temporary injunction of the revocation of three (3) schools by the MNPS Board of Education, noting that MNPS was permitted to continue any responsibilities as an authorizer, including those related to T.C.A. § 49-13-122.
11. On July 9, 2019, the MNPS Board of Education approved a motion to consider revocation of the three (3) schools after thirty (30) days.
12. On July 10, 2019, the MNPS Office of Charter Schools issued a notice to the governing board of reasons for possible revocation of the three (3) schools' charter agreements and requested documentation related to the reasons for revocation.
13. On August 27, 2019, the MNPS Board of Education voted to revoke the charter agreements of Knowledge Academy Middle, KA @ The Crossings, and Knowledge Academy High School, citing 14 reasons for revocation.
14. On September 6, 2019, the governing board appealed the revocation of its three (3) charter agreements in writing to the State Board of Education.
15. On October 2, 2019, the State Board of Education held a public hearing in Nashville, Tennessee on the revocation decision of the MNPS Board of Education.
16. After a review of the procedural history, findings of fact, and analysis of the issues, the State Board of Education voted to overturn the decision of the MNPS Board of Education in the appeal of Knowledge Academy Middle, KA @ The Crossings, and Knowledge Academy High School and remand the schools back to MNPS for continued operations.
17. On November 21, 2019, the MNPS Office of Charter Schools issued a Notice of Probation to Knowledge Academies based on existing deficiencies.

18. Effective January 6, 2020, Knowledge Academies and MNPS entered into a Support Plan which included corrective action steps. Knowledge Academies completed the tasks and exited probationary status on December 18, 2020.
19. For the 2021-2022 school year, Knowledge Academy Middle and KA @ The Crossings served grades 5 through 8, and Knowledge Academy High School served grades 9-12. The three (3) schools, which operate in the same facility, had a maximum total enrollment allowed of 1,112 across all three (3) schools.
20. On April 1, 2021, the governing board submitted to MNPS an application to renew the charter agreement of Knowledge Academy Middle.
21. On December 9, 2021, the governing board submitted a letter to the MNPS Board of Education requesting consideration of the consolidation of the charter agreements for Knowledge Academy Middle, KA @ The Crossings, and Knowledge Academy High School into a single charter agreement.
22. Following two (2) deferred votes, on January 11, 2022, the Office of Charter Schools presented a recommendation at the MNPS Board of Education meeting to not renew the charter agreement of Knowledge Academy Middle. The MNPS Board of Education approved this recommendation.
23. On January 12, 2022, MNPS notified the governing board of the MNPS Board of Education's decision to not renew the charter agreement for Knowledge Academy Middle for a new, ten (10) year term.
24. On January 21, 2022, the governing board appealed the denial of the renewal application on Knowledge Academy Middle in writing to the Commission, including submission of all required documents per Commission policy 2.200.
25. On March 8, 2022, the Commission staff held a public hearing in Nashville. At the public hearing, the Executive Director, sitting as the Commission's designee, heard presentations from the governing board and MNPS, and took public comment.
26. On March 15, 2022, the governing board submitted an emergency amendment petition to the MNPS Board of Education, requesting to consolidate the three (3) charter agreements into one (1) single charter agreement under KA @ The Crossings which expires in the 2025-26 school year.
27. On March 28, 2022, KA officially withdrew its appeal of the denial of its renewal application. KA stated that the reason for this withdrawal was that the governing board had submitted an emergency amendment petition to the MNPS Board of Education requesting to consolidate the three (3) charter agreements into one school serving grades 5 through 12, and the governing board wanted to continue to work with MNPS.
28. On April 21, 2022, MNPS submitted its findings report to the KA governing board regarding the emergency amendment petition request, and the Office of Charter Schools' recommendation was to deny the petition.



29. On April 26, 2022, the MNPS Board of Education voted to deny the emergency amendment petition of KA @ The Crossings.
30. On May 4, 2022, the governing board appealed the denial of its emergency amendment petition to the Commission.
31. On June 8, 2022, the Commission staff held a public hearing virtually, where both KA and MNPS provided opening and closing presentations, questions asked by the Executive Director, and heard two public comments.

FINDINGS OF FACT

KA currently operates three (3) charter schools in the Antioch region of Nashville. Knowledge Academy Middle began operations in 2012-13 and serves students in grades 5 through 8 under its charter agreement. After the opening of Knowledge Academy Middle, the governing board applied to MNPS to establish a high school, and MNPS approved Knowledge Academy High School to open in 2015-16. Based on the success that KA experienced, and Knowledge Academy Middle being designated as a Reward School by the State of Tennessee in 2014, the governing board applied for and was granted a third charter agreement under MNPS, which led to the opening of KA @ The Crossings in the 2016-17 school year. Currently, these three (3) schools operate on a single campus and have one school leader, although the schools have separate school numbers and students who are technically enrolled in each school. The amendment petition would enable KA to operate its three (3) schools under a single charter agreement and serve students grades 5 through 12 with a total enrolment of 1,112.

Pursuant to Commission rule 1185-01-01-.04, the Tennessee Department of Education amendment application is required to be used when submitting an amendment petition to the district. MNPS developed a Charter School Authorization Handbook which stated that each application would be reviewed by a review team, each member of the review team would complete an evaluation report that would be submitted to MNPS, and a "recommendation report will be compiled from the combined analysis of the entire process and presented to the MNPS Board of Education for their review..." Per MNPS's handbook, the eligibility requirements for an amendment petition are that "a school must be in years 4 through 8 and in good standing for a period of three (3) years in all three (3) domains of the Authority's academic, financial, and organizational performance frameworks and it must not be considered a low-performing school."

On March 15, 2022, KA submitted an emergency amendment application to the MNPS Office of Charter Schools to consolidate the charter agreements for Knowledge Academy Middle, KA @ The Crossings, and Knowledge Academy High School under the KA @ The Crossings agreement, with a charter term ending 2025-2026. On April 26, 2022, the MNPS Board of Education met to discuss the emergency amendment petition and to consider the recommendation of the Office of Charter Schools. The Office of Charter Schools recommended that MNPS deny the emergency amendment application to consolidate the three (3) charter agreements into one (1) single charter agreement, and the MNPS Board of Education voted to deny the emergency amendment petition.



On April 27, 2022, MNPS mailed notification to the governing board regarding the denial of the emergency amendment request, and three (3) reasons were cited:

1. KA @ The Crossing is not eligible for emergency amendment because there were no unanticipated extraordinary circumstances;
2. The amendment application lacks attention to the population of Non-English Language background families and students served at Knowledge Academy; and
3. Currently, all three (3) charters have an enrollment of a combined 447 seats with no waitlist. As such, an increase in enrollment seating is not needed.

Following the denial of the emergency amendment application, the governing board appealed the denial of its amendment application in writing to the Commission on May 4, 2022. Commission staff collected evidence from MNPS and KA, pursuant to Commission rule 1185-01-01-.04, to determine whether the decision of MNPS was contrary to the best interest of the students, LEA, or community. Additionally, the Executive Director, sitting as the Commission's designee, held a virtual public hearing on June 8, 2022. Both parties presented evidence at the public hearing and answered questions from the Executive Director, and the staff collected public comments.

Public Hearing

Pursuant to Commission rule 1185-01-01-.04, a public hearing chaired by the Executive Director was held on June 8, 2022. The governing board of KA began its opening presentation by reviewing the history of the three (3) charter agreements between the governing board and MNPS as well as the 2019 revocation and appeal proceedings. The operator highlighted the 2019 recommendation of the Executive Director of the State Board of Education which referenced the importance of authorizers following the Tennessee Quality Authorizing Standards and areas where MNPS failed to follow these standards in its work with the operator. The first of the three (3) schools under the operator to come up for renewal was Knowledge Academy Middle. The operator indicated in its opening presentation that MNPS failed to comply with state law by not providing a performance report to the governing board in advance of voting to not renew the Knowledge Academy Middle charter agreement in January 2022.¹ Since MNPS had previously removed all three (3) schools under Knowledge Academies from probationary status in December 2020, the governing board was under the impression that Knowledge Academy Middle was in good standing and would be recommended for renewal by the district staff.

During the presentation, the operator stated that MNPS staff acknowledged that the performance report had not been provided in accordance with statute and asked the governing board how they would like to remedy the situation. In response, the governing board sent a letter to MNPS, dated December 9, 2021, that detailed the proposed consolidation of the three (3) charter agreements upon renewal of Knowledge Academy Middle. The governing board indicated that there was no

¹ In accordance with T.C.A. § 49-13-121(c), "[t]hree (3) months prior to the date on which a public charter school is required to submit a renewal application, the authorizer shall submit to the public charter school a performance report that reflects the renewal evaluation."



response to this letter by MNPS, but the MNPS Board of Education discussed the consolidation proposal at its December 2021 and January 2022 board meetings. After delaying the vote on the renewal of Knowledge Academy Middle two times, the MNPS Board of Education voted to not renew the charter agreement of Knowledge Academy Middle on January 22, 2022. The operator stated in its presentation that the MNPS Board considered the consolidation request in its deliberations and acknowledged the benefits of this proposed plan. Finally, the operator indicated that the emergency amendment application was the only path to consolidate the charter agreements at the present moment as a result of law² requiring that amendments for grade span adjustment be filed in the fall.

In its opening presentation, MNPS explained the review process of an amendment petition, which includes assembling a review team, holding a consensus meeting after reviewing the petition to determine evidence findings, and presentation of those evidence findings to the MNPS Board of Education for a vote on the petition. MNPS stated that the operator's emergency amendment petition was presented to the Board of Education on April 26, 2022. MNPS stated that the review team found that the emergency amendment petition did not address the extraordinary circumstances giving rise to an emergency, failed to address non-English learners as a population, and did not warrant an increase in maximum enrollment numbers as the schools do not currently have a waitlist.

The parties then answered questions from the Executive Director. The operator clarified that the governing board presented MNPS with the consolidation proposal by letter in December 2021, and the desire to consolidate the agreements was to streamline academic and operational efficiency since all three (3) schools operate in the same facility. The operator reiterated their surprise at the MNPS staff's recommendation to not renew the agreement for Knowledge Academy Middle since they did not receive a renewal performance report, and they had no communication with MNPS staff from submission of the renewal application to receiving the recommendation to non-renew the agreement.

In explaining the need for this petition to be submitted as an emergency application, the operator stated that the Commission rule does not permit the submission for this type of amendment in any other way than an emergency petition if not submitted within the fall semester. The operator stated that, since the three (3) schools had been moved off of probationary status by MNPS in December 2020, the governing board was not anticipating a recommendation to non-renew the agreement for Knowledge Academy Middle. Therefore, it did not submit a request to consolidate the agreements in the fall of 2021, and once notified of the recommendation to non-renew in November 2021, the timeline for a traditional fall amendment petition submission had passed. After the submission of the proposed consolidation plan in December 2021, the governing board did not receive a response from MNPS or stated that MNPS did not engage them in a conversation about the request until the emergency petition was submitted in March 2022.

The Executive Director asked for an update on the current enrollment across the three (3) schools, and the operator indicated that there are 520 fully enrolled and registered across all schools as well as 144 active leads for recruitment. The operator is engaged in a comprehensive recruitment program to increase the enrollment of the schools and is using various marketing means to advertise

² KA's attorney stated that law set forth the fall window for grade span adjustment. For clarity, Tenn. Comp. R. & Regs. 1185-01-01-.04 establishes the standards and timeframes for amendment petitions.



the schools. The operator also stated that they have hired a new principal who is a former assistant principal from MNPS.

The Executive Director asked about the facility and the bond that was used to finance the facility. The operator explained that, while the bond covenants are not tied to the overall school having 1,112 seats, the covenants were granted based on the student population, expected student growth, and available space. The operator confirmed that failure to have the seats would not result in immediate non-compliance with the bond, but it would be a detriment to the schools. While the current enrollment allows the school to meet its financial obligations, the operator stated that it does not provide sufficient funding streams for additional academic programs that they wish to offer and the additional students the schools have previously served. The operator again highlighted that the maximum enrollment number listed in the petition of 1,112 is not arbitrary but rather reflective of the enrollment numbers granted in the three (3) current charter agreements and schools.

The Executive Director then turned questions to MNPS. MNPS explained that while there were multiple conversations with the operator regarding the proposed consolidation of the charter agreements, true deliberations would only occur with a formal application. MNPS explained that the December 9, 2021 letter was not a formal application, and therefore, the Board of Education did not consider the consolidation until receiving the emergency amendment application at subject in this appeal. When asked how MNPS communicated to its charter schools the Commission's rule change, which allowed emergency petitions to be used for grade and enrollment changes, MNPS explained that its authorization handbook was immediately updated³, and they conducted several onsite visits with the schools within their portfolio to allow for dialogue regarding the changes. The Executive Director then asked about a letter that was referenced by the operator wherein they alleged the parents of all KA schools were informed erroneously of the non-renewal of all three (3) Knowledge Academies schools. MNPS stated that, while it is their position that the letter is immaterial to the appeal before the Commission, the letter in question was sent to 161 students who were identified as attending Knowledge Academy Middle within the MNPS student data system. MNPS also explained that the letter detailed that the non-renewal only applied to Knowledge Academy Middle and had no impact on KA @ The Crossings or Knowledge Academy High School.

When questioned about the communication that occurred regarding the amendment petition, MNPS stated that, in speaking with the operator upon receipt of the emergency amendment application, the operator cited financial reasons for needing to retain 1,112 seats. Because an alternative maximum enrollment was not tenable for KA under a consolidated charter, the MNPS Board of Education met to discuss the proposal. When asked about the criteria used to evaluate the petition, MNPS stated that they used the Commission's permanent rule on unanticipated emergency circumstances to evaluate the operator's petition. When asked about how MNPS considered the academic performance of the schools when evaluating the petition, MNPS stated that the denial of

³ LEA Information, Exhibit F, Amendment Process Authorization Handbook, page 7. Upon review of the record, Commission staff determined that the handbook does not include the updated language regarding emergency amendment applications.



the amendment petition was based on the actual emergency status, without consideration of KA's academic status.

Finally, Commission staff read two (2) public comments into the record. The first statement spoke to the growth and success of the operator. The second comment summarized three (3) public meetings held by the operator where parents, students, and community partners spoke in support of the operator and the continuation of the Knowledge Academies network.

In presenting its closing statement, the operator stated that MNPS did not follow quality authorizing standards or state law. The operator stated that the proficiency and growth scores of the three (3) schools under Knowledge Academies meet or exceed all schools in the surrounding area. The operator stated that Knowledge Academy High School math coursework is more demanding than surrounding schools and its growth rates in most subjects are greater than high schools in the Antioch and Cane Ridge areas. The operator highlighted its operational stability by way of growing enrollment, financial health through an aggregated \$1 million fund balance, and its future planning. The operator noted that MNPS gave KA @ The Crossings a compliance rating of "excellent" for special education compliance for the period of August 2021 through February 2022. KA asserts that the MNPS Board of Education was not presented with the facts identified in the emergency petition for why this amendment qualifies as an emergency and was not informed of the academic progress of the schools to consider in their deliberations. KA continued to explain that the authorizer did not the requirements of statute throughout its work with the schools nor did it follow quality authorizing standards, which provide for occasional material changes. For these reasons, the operator stated that the denial of the emergency amendment petition is not in the best interest of the students, LEA, or community.

MNPS stated that there is no emergency raised in the operator's amendment petition application, and those petitions should only be submitted if good cause for an emergency exists. MNPS referenced an explanation by the Commission's General Counsel on what constitutes an emergency, and MNPS stated that the operator could have anticipated the non-renewal. MNPS alleges that KA is using the emergency amendment petition process to circumvent the Board's non-renewal and retain the seats it is set to lose on July 1 when the charter agreement for Knowledge Academy Middle expires. MNPS stated that before considering whether the petition is in the best interest of the students, the LEA, or community, the first question is whether an emergency exists. MNPS stated that this petition does not rise to an emergency, and the decision of the MNPS Board of Education should not be overturned.

ANALYSIS

The decision of MNPS to deny the emergency amendment petition of KA was based upon the reasons stated in the April 27, 2022 denial notice. Based on the totality of the evidence presented by both parties during this appeal, including information gained at the public hearing and through public comments, I determine that the decision of the MNPS Board of Education to deny the emergency amendment application of KA was contrary to the best interests of the students, the LEA or the community. As such, pursuant to Commission rule 1185-01-01-.04, I recommend that the Commission overturn the decision of the MNPS Board of Education and remand the decision back to the MNPS Board of Education to approve the emergency amendment application of KA.



One of MNPS' reasons for denial of the emergency amendment petition is that this petition does not rise to the level of an emergency. MNPS points to a statement by the Commission General Counsel that an emergency is "akin to an act of God." While those occurrences are clear emergencies, that statement should not be considered exhaustive of all circumstances constituting an emergency. The language of the rule regarding the use of an emergency petition is that an emergency petition is for use in "extraordinary, unanticipated circumstances."⁴ MNPS stated that the operator should have anticipated the denial of the renewal, and, therefore, used the fall amendment petition window to submit this amendment petition. However, MNPS removed the schools from probationary status in December 2020 and failed to provide a renewal performance report to the governing board (which was due by December 31, 2020) as required by statute. The governing board only received notice of the recommendation to non-renew the agreement of Knowledge Academy Middle in November 2021, and the deadline to submit an amendment petition in the fall is October 1. Had the operator received proper notice in the form of a renewal performance report, the operator could have submitted an amendment petition within the traditional fall timeline or engaged in a conversation with MNPS regarding the renewal recommendation and proposed consolidation.⁵ Moreover, in late 2021, MNPS admitted to its error of failing to provide a performance report and asked the operator for a proposed remedy. As a result, the governing board submitted a proposed consolidation plan via letter in December 2021 and requested to meet to start a conversation about this plan. However, MNPS never responded to the letter, and the MNPS Board of Education subsequently voted to deny the renewal of Knowledge Academy Middle.

Additionally, MNPS stated in the public hearing that it did not consider the academic results of the operator's schools and how they compare to the surrounding schools when considering the amendment petition. MNPS stated that the denial was based on the lack of defense of it qualifying as an emergency. However, MNPS cited concerns around the operator's services to English Learners as a reason to deny the petition. Therefore, it is not clear what or if academic performance was considered by MNPS when reviewing this emergency petition. The operator has earned a TVAAS 3 level for Knowledge Academy and KA @ The Crossings and TVAAS 2 for KA High School according to the Department of Education's most recent public assessment data, which is higher than all surrounding MNPS schools. Additionally, the schools have exited the Targeted Support and Improvement (TSI) list, which includes schools that fall in the bottom five percent for their weighted overall accountability score for any given student subgroup. The proficiency rates for Knowledge Academy and KA @ The Crossings also meet or exceed the MNPS zoned middle schools in Antioch and Cane Ridge. While their school's academic improvement needs to continue over the remainder of the charter term to merit renewal, these results demonstrate that the schools are outperforming their surrounding schools, and these academic results cannot be ignored or discounted. The consolidation creates efficiencies in the delivery of academic programming and puts KA in the best posture to continue achieving its goals for academic growth.

⁴ Tenn. Comp. R. & Regs. 1185-01-01-.04(1)(m).

⁵ Tenn. Comp. R. & Regs. 1185-01-01-.04(e)(1).

MNPS' final argument is that the current student enrollment does not warrant "an increase in seats."⁶ However, this argument is partially flawed on its face. The operator currently has three (3) active charter agreements with all rights and considerations attached, through June 30, 2022. That includes consideration of the amendment to combine all three (3) charter agreements. As of today, those three (3) agreements, have a total enrollment of 1,112 (Knowledge Academy Middle 272; KA @ The Crossings 400; Knowledge Academy High School 440).⁷ The request cites a total enrollment for the consolidated charter to be 1,112.

The flawed reasoning notwithstanding, MNPS was proper to consider the under-enrollment the operator is experiencing, however, as stated in the public hearing, the operator's confirmed enrollment for the next school year is 520 students, with an additional 18 applications in process and 144 active leads. This is within five percent of the proposed enrollment of 550 students proposed in the amendment petition. It is also worth mentioning that the under-enrollment KA is experiencing currently is a reflection of the 2019 revocation proceedings and appeal process. Since that time, the governing board of KA has made significant strides towards recovery and rebuilding, including exiting TSI lists, increasing enrollment, exiting probationary status from MNPS, accumulating a \$1 million fund balance, and increasing its enrollment. Under a consolidated charter agreement, with a 2025-26 end of term, the operator can continue to serve its students and surrounding community and demonstrate clear academic achievement and student growth while allowing the authorizer to fulfill its obligations under statute. I strongly encourage the operator to concentrate on demonstrating significant and sustained enrollment growth, strong academic achievement, and operational and financial health in advance of its renewal term in 2026. I similarly encourage the authorizer to be clear with its communication regarding the status of the school, including any need for intervention or non-renewal status, and closely follow all of its statutory obligations.

The evidence in this appeal highlights the importance of regular communication between authorizer and operator. A timely renewal performance report provided to the governing board by MNPS, as required by law, would have eliminated the need for an emergency amendment petition. Or, in the alternative, a meaningful conversation surrounding this consolidation proposal when it was first raised in December 2021 could have provided the parties with the opportunity to negotiate an amendment mutually beneficial to both MNPS and KA without the need to appeal the decision to the Commission.

The KA network has established itself as a viable choice for families in Southeast Nashville and has shown growth and an intent to continue building on its recent successes. I can only conclude that a consolidated charter agreement through June 30, 2026 would be in the best interest of the students, LEA, or community.

CONCLUSION

For these reasons, and in consideration of the entire record, public hearing, and public comments, I believe that the decision to deny the amendment petition of KA @ The Crossings was

⁶ LEA Information, Exhibit J, page 3.

⁷ LEA Information, Exhibit G, KA Charter School Presentation SY23.24 FINAL, page 4.



contrary to the best interests of the students, the LEA, or the community. The amendment petition, to consolidate the charter agreements for Knowledge Academy Middle, KA @ The Crossings, and Knowledge Academy High School into one (1) charter agreement, KA @ The Crossings, active through the 2025-26 school year, and relinquishing the separate agreements is in the best interests of the students, LEA, or the community. Therefore, I recommend that the Tennessee Public Charter School Commission overturn the decision of MNPS and remand the decision back to MNPS to approve the amended application of KA @ The Crossings with a maximum enrollment of 1,112.

A handwritten signature in black ink that reads "Tess Stovall". The signature is written in a cursive style.

Tess Stovall, Executive Director
Tennessee Public Charter School Commission

6/28/2022

Date