



Executive Director's Recommendation

American Classical Academy Madison 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 their amended application by a local board of education to the Tennessee Public Charter School Commission ("Commission"). On July 28, 2023, the sponsor of American Classical Academy Madison ("sponsor") appealed the denial of its amended application by the Jackson-Madison County School System (JMCSS) Board of Education to the Commission.

Based on the procedural history, findings of fact, analysis, and Review Committee Report, attached hereto, I believe that the decision to deny the American Classical Academy Madison (ACAJM) amended application was contrary to the best interests of the students, the LEA, or the community.¹ Therefore, I recommend that the Commission overturn the decision of JMCSS Board of Education to deny the amended application for ACAJM.

STANDARD OF REVIEW

Pursuant to T.C.A. § 49-13-108 and Commission Policy 2.000, Commission staff and an independent review charter application review committee conducted a de novo, on the record review of ACAJM's amended application. In accordance with the Tennessee Department of Education's charter application scoring rubric, "[f]or an application to be deemed eligible for approval, the summary ratings for all applicable categories must be "Meets or Exceeds the Standard."² In addition, the Commission is required to hold a public hearing in the district where the proposed charter school seeks to locate.³

In order to overturn the decision of the local board of education, the Commission must find that the application meets or exceeds the metrics outlined in the department of education's application-scoring rubric and that approval of the amended charter application is in the best interests of the students, local education agency (LEA), or community.⁴ If the local board of education's decision is overturned, then the Commission can approve the application, and thereby authorize the school, or affirm the local board's decision to deny.

PROCEDURAL HISTORY

1. On December 5, 2022, the sponsor submitted a letter of intent to JMCSS expressing its intention to file a charter school application.
2. The sponsor submitted its initial application for ACAJM to JMCSS on February 1, 2023.
3. JMCSS assembled a review committee to review and score the ACAJM initial application.
4. On March 24, 2023, JMCSS's review committee conducted a capacity interview with representatives of ACAJM.

¹ T.C.A. § 49-13-108

² Tennessee Charter School Application Evaluation Rubric – Ratings and Scoring Criteria

³ T.C.A. § 49-13-108

⁴ *Id.*

5. JMCSS's review committee reviewed and scored the ACAJM initial application and recommended to the JMCSS Board of Education that the initial application be denied, indicating it partially met standards in academics, operations, and finance.
6. On April 27, 2023, JMCSS Board of Education voted to deny the ACAJM initial application based on the review committee's recommendation.
7. The sponsor amended and resubmitted its application for ACAJM to JMCSS on May 30, 2023.
8. JMCSS's review committee reviewed and scored the ACAJM amended application based on the charter application scoring rubric.
9. JMCSS's review committee rated each section of ACAJM's amended application as partially meets standards and recommended denial to the local board of education.
10. On July 25, 2023, the JMCSS Board of Education voted to deny the amended application of ACAJM.
11. The sponsor appealed the denial of the ACAJM amended application in writing to the Commission on July 28, 2023, including submission of all required documents per Commission Policy 2.000.
12. The Commission's review committee independently analyzed and scored the ACAJM amended application using the Tennessee Department of Education's charter school application scoring rubric.
13. The Commission's review committee conducted a capacity interview with key members of the ACAJM leadership team on September 8, 2023 via Microsoft Teams.
14. On September 18, 2023, the Commission staff held a public hearing at the JMCSS Board Room in Jackson, Tennessee. At the public hearing, the Executive Director, sitting as the Commission's Designee, heard presentations from the sponsor and JMCSS and took public comment regarding the ACAJM amended application.
15. After the capacity interview, the Commission's review committee determined a final consensus rating of the ACAJM amended application, which served as the basis for the Review Committee Recommendation Report, attached hereto as **Exhibit A**.
16. The Commission staff conducted a full review of the record which includes the initial and amended applications submitted by the sponsor, documentation submitted by JMCSS, 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 25, 2023 board meeting, the JMCSS Board of Education voted to deny the amended application of ACAJM citing seventy-four (74) reasons for denial, including a finding of a substantial negative fiscal impact to Jackson-Madison County School System. 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 exists such that approval of the charter school would be contrary to the best interests of the students, the LEA, or the community. The Commission staff analyzed previous evaluations conducted by the Office of the State Treasurer and the State Board of Education and used the same general methodology to determine if substantial negative fiscal impact exists in this case. In keeping with the analyses

done by other entities, the key questions are what historical enrollment fluctuations the school district has dealt with, and how does the enrollment decline that would result from the opening of the proposed charter school compare to these fluctuations.

The following findings are based on information collected by Commission staff regarding the substantial negative fiscal impact of JMCSS:

1. ACAJM’s amended application states that in the 2024-25 school year, ACAJM’s first anticipated year of operation, it will enroll a maximum of 340 students.⁵
2. Commission staff requested from JMCSS historical trends of projected Average Daily Membership (ADM) versus actual ADM for the current and three (3) preceding school years. The table includes actual ADM by year, the percentage growth from the previous year, the district’s projected student growth for that year, and actual student growth seen.

Table 1. Historical ADM and System Growth⁶

	Actual ADM	% Growth From Previous Year	Projected Student Growth	Actual Student Growth
SY24-25 (Projected)	11,435	-4.44%	-340	N/A
SY 23-24	11,966	1.96%	201	230
SY 22-23	11,736	0.34%	-361	40
SY 21-22	11,696	-0.48%	-326	-57
SY 20-21	11,753	-2.04%	N/A	-245

3. Per the resolution denying ACAJM’s amended application, JMCSS estimated that the total fiscal impact during Year 1 of JMCSS’s operations would be \$1.28 million. According to the resolution, this estimate is based on the per pupil funding that follows the potential charter school student without a corresponding reduction in the fixed or variable costs to the district. The amount in the resolution varies significantly from the district’s estimated substantial negative fiscal impact that was provided by the district in response to the Commission’s Request for Information dated July 31, 2023. In JMCSS’s written statement to the Commission, the district estimates the substantial negative fiscal impact of up to \$3.56 million. JMCSS stated this was calculated using the FY24 average per pupil funding. When questioned in the public hearing regarding the material variance between the two figures, district personnel cited the increase of TISA funding in FY24. Furthermore, in the public hearing, JMCSS stated that determining substantial negative fiscal impact was a responsibility of the district’s ad hoc committee on charter schools. The ad hoc committee was formed in addition to a review committee with the specific task to study the fiscal impact on the district’s budget, should ACAJM be approved and authorized to open in the Madison County.
4. The Commission staff reviewed the district’s past audits and gathered the fund balance committed for education since 2019-20.

⁵Amended Application, pg. 36

⁶All data provided by Jackson-Madison County School System in response to the Commission’s July 31, 2023 request for information.

Table 2. Unassigned Fund Balance⁷

	Unassigned Fund Balance	% Growth From Previous Year
SY 21-22	\$14.4 Million	34%
SY 20-21	\$10.8 Million	23%
SY 19-20	\$8.7 Million	1%

5. The Commission staff requested the historical per pupil allocation (PPA) for Jackson-Madison County School System for past three (3) years. However, the district was unable to provide this information.

ANALYSIS

After an in-depth analysis of the data and information provided by JMCSS in support of its argument, I cannot conclude that JMCSS has carried its burden of proving that the approval of ACAJM's application will present a substantial negative fiscal impact on the district.

The crux of the JMCSS argument rests on the fact that while fixed costs remain the same, charter schools remove per-pupil funding when students leave traditional classrooms. The fixed costs that the district states do not change when student enrollment goes down include staff and transportation. Further, the district states that these costs only decrease when student enrollment decreases in large numbers in concentrated areas. The district stated that, since ACAJM seeks to serve the East Jackson neighborhood, it is possible that each of the six closest elementary schools would lose 56 students spread across six grade bands (K-5). This would leave JMCSS in a position where it was unable to reduce staff or other direct costs yet lose the funding. The district's argument rests on the premise that since the loss of students is too diluted and not concentrated to a specific school or geographic region, the district cannot effectively lower fixed costs such as staff, transportation, or special services, resulting in a substantial negative fiscal impact of \$3.56 million.

However, based on the data provided by JMCSS, there is clear evidence that the district has enrollment fluctuations, and the district has historically managed enrollment increases and declines similar to what they would see if ACAJM opened. Despite these fluctuations, the district's financial position has continued to increase over the past few years, with fund balances exceeding the State requirement of 3%. Furthermore, with the opening of Blue Oval City, a recent study cited during the public hearing projects enrollment to increase by 8.1% district wide, and 2.1% projected growth in East Jackson, putting the district in an even better position to absorb any reductions in overall student enrollment resulting from the opening of ACAJM.

Over the last few years, the district has seen enrollment fluctuations that, on average, represent approximately 0.07% of ADM. JMCSS saw a 2% drop in enrollment directly tied to the pandemic, but enrollment has since rebounded, with an overall enrollment increase in the 2022-23 school year consistent with pre-pandemic enrollment amounts. In all of the enrollment data presented, the district has seen both enrollment growth and enrollment declines similar to the enrollment amounts projected by ACAJM. Therefore, the district regularly manages to sustain its operations and financial sustainability in the district's enrollment despite enrollment fluctuations above and beyond the impact of opening the proposed charter school.

Moreover, the information contained within the past three (3) years of audits reinforces the fact that JMCSS' financial position has continued to increase, despite fluctuations in enrollment. This is demonstrated by the

⁷ Madison County, Tennessee Annual Financial Report for 2022, p. 162; 2021, pg. 154; 2020 p. 151

Unassigned General Purpose School fund balance having a healthy balance that has grown annually based on its annual audits for the past three (3) years (Table 2). This signals the likelihood of continued financial health and a strong financial position for the district.

Lastly, the confidence level in the district’s calculated substantial negative fiscal impact is greatly jeopardized by the lack of consistency between the amounts included within the denial letter (\$1.28 Million), which was provided to the sponsor, and the amount included within the written statement to the Commission as a part of the Request for Information (\$3.56 Million). When questioned about the variance in the public hearing, the district representative stated that the variance resulted from the increase TISA funding per pupil. While districts likely did see an increase in per pupil funding for FY24 as a result of TISA funding, these increases would not be as significant as the variance between the two calculations. Further, no documentation or rationale was provided for how the \$1.28 million was determined. Moreover, when the Commission requested per pupil allocations for the district to determine if there has been an overall increase or decrease, the district stated that it did not have this information.

In totality, there is a lack of evidence provided by JMCSS to meet the burden of proving that the approval of ACAJM will constitute substantial negative fiscal impact on the district. In order to meet the bar of being considered substantially negative, the fiscal impact of opening a charter school must be above and beyond the district’s normal enrollment and budgetary fluctuation. In the case of ACAJM, the data demonstrates that despite enrollment fluctuations, the district’s financial position continues to improve.

Based on these findings of fact and analysis, I find that the evidence provided by JMCSS does not meet the burden of proving that the approval of ACAJM will constitute a substantial negative fiscal impact on the district such that approval of the school would be contrary to the best interests of the students, the LEA, or the community.

District Denial of Initial Application

The review committee assembled by JMCSS to review and score the ACAJM initial application consisted of the following individuals:

Name	Title
Dr. Patrice Richardson-Martin	Chief Compliance and Monitoring Officer
Dr. Teresa McSweeney	Chief Innovation Officer
Tiffany Spight	Chief Academic Officer
Kippi Jordan	Chief of Schools
Dr. Shalonda Franklin	Chief of Social and Behavior Services
Catherine Korth	Chief of Assessment and Accountability
Tim Gilmer	Chief Support and Safety Officer
Jason Bridgeman	Chief Operations Officer
Dr. Diane Hicks-Watkins	Chief Human Resource Officer
Bernice Thompson	Director of Special Education
Frenchie Fuller	Interim Director of Federal Programs
Janice Hampton	School Board Member
Geneva Hoyle	Retired Teacher
Karen Bell	Madison County Finance Director
Sheila Godwin	Paraprofessional, County Commissioner

The ACAJM initial application received the following ratings from the JMCSS review committee:

Sections	Ratings
Academic Plan Design and Capacity	Partially Meets Standard
Operations Plan and Capacity	Partially Meets Standard
Financial Plan and Capacity	Partially Meets Standard

After the JMCSS review committee completed its review and scoring of the initial application, its recommendation was presented to the JMCSS Board of Education on April 27, 2023. Based on the review committee's recommendation, the JMCSS Board of Education voted to deny the initial application of ACAJM.

District Denial of Amended Application

The review committee assembled by JMCSS to review and score the ACAJM amended application consisted of the following individuals:

Name	Title
Dr. Patrice Richardson-Martin	Chief Compliance and Monitoring Officer
Dr. Teresa McSweeney	Chief Innovation Officer
Dr. Vivian Williams	Deputy Superintendent of Academics
Dr. Bryan Chandler	Principal, North Side High School
Tiffany Spight	Chief Academic Officer
Kippi Jordan	Chief of Schools
Dr. Shalonda Franklin	Chief of Social and Behavior Services
Catherine Korth	Chief of Assessment and Accountability
Tim Gilmer	Chief Support and Safety Officer
Jason Bridgeman	Chief Operations Officer
Dr. Diane Hicks-Watkins	Chief Human Resource Officer
Bernice Thompson	Director of Special Education
Frenchie Fuller	Interim Director of Federal Programs
Janice Hampton	School Board Member
Geneva Hoyle	Retired Teacher
Karen Bell	Madison County Finance Director
Sheila Godwin	Paraprofessional, County Commissioner

Upon resubmission, the JMCSS review committee conducted a review of the amended application, and the amended application received the following ratings from the JMCSS review committee:

Sections	Ratings
Academic Plan Design and Capacity	Partially Meets Standard
Operations Plan and Capacity	Partially Meets Standard
Financial Plan and Capacity	Partially Meets Standard

After the JMCSS review committee completed its review and scoring of the amended application, its recommendation was presented to the JMCSS Board of Education on July 25, 2023. At the July 25, 2023 board meeting, the JMCSS Board of Education voted to deny the amended application of ACAJM.

Commission Review Committee's Evaluation of the Application

Following the denial of the ACAJM 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 ACAJM amended application. This review committee consisted of the following individuals:

Name	Title
Kristine Barker	External Reviewer
Kathryn Bridges	Commission Staff
Trent Carlson	Commission Staff
Beth Figueroa	Commission Staff
Susie Smith	External Reviewer
Clare Vickland	External Reviewer

The review committee conducted an initial review and scoring of the ACAJM 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 review committee's consensus rating of the ACAJM application was as follows:

Sections	Ratings
Academic Plan Design and Capacity	Meets or Exceeds Standard
Operations Plan and Capacity	Meets or Exceeds Standard
Financial Plan and Capacity	Meets or Exceeds Standard

The review committee recommends the approval of the amended application for American Classical Academy Jackson Madison because the applicant has a clear plan for serving the students in East Jackson, has identified a school leader with deep experience in implementing the classical instructional model, and has demonstrated sufficient financial commitments to support the school as it scales.

The academic plan presented by the applicant meets or exceeds the standard because of the clearly identified community within Madison County for the proposed school. In the application and capacity interview, the applicant demonstrated support for the proposed school within the community the school intends to locate, along with clear community engagement efforts affirmed by letters of support and canvassing specifically in East Jackson. This provides sufficient assurance that enrollment targets can be met in Year 1. Additionally, given the organizational structure of the American Classical Education model, the model relies on a strong and experienced school leader for successful implementation of the academic model. ACAJM has identified a school leader who has successfully opened a Barney Charter School Initiative ("BCSI") affiliated charter school in Florida, and she was able to speak to areas within the application, such as service of special populations, assessments, and school culture, to provide further clarity. The school leader demonstrated deep knowledge of the instructional model, curriculum, and professional development supports provided to teachers to successfully carry out the academic model, and she discussed how instruction would be differentiated and special populations of students would be identified and monitored. The proposed school leader also demonstrated expertise in developing and implementing a school culture plan that focuses on character development and academic performance. Due to the totality of the evidence presented in the application and capacity interview, the review committee determined that the Academic Plan and Capacity meets the standard.

The applicant's operations plan meets or exceeds standard as the application outlines detailed start-up and facility plans that align with the community of East Jackson. The applicant plans to partner with a reputable company who has a track record of supporting charter schools in facility projects. While the sponsor has not yet secured a

specific facility, the applicant has identified multiple viable options within East Jackson and is in discussions with the County Commission and real estate firms to ensure the ability to execute a facility option upon authorization. The network proposes a model that is almost exclusively principal-led and so the identification of a competent and experienced leader was found to be paramount to the applicant's ability to open successfully. The identification of the proposed school leader for ACAJM was deemed a strength from an organizational perspective as during the capacity interview she was able to speak to staffing, professional development, and robust recruitment plan. These key operational areas will be essential to ensure the execution of the instructional model with fidelity. Additionally, the identification of a school leader ensures time sensitive items related to start-up activities remain on track.

The financial plan is comprehensive and includes reasonable assumptions that support the start-up expenses necessary to carry out the academic model outlined within the application. This is a result of the sponsor drawing from historical financial data from other BCSI schools and quotes from service providers. The operating budget is strengthened by the additional support from American Classical Education Foundation, which includes access to no-interest loans and a line of credit sufficient to cover any potential budgetary or cash shortfalls experienced due to a lack of charter school start-up grant funds, enrollment targets not being met, facility related expenses, or the cost of scaling programs.

For the aforementioned reasons, the review committee found that the sponsor did meet or exceed the standard for approval based on the state's scoring rubric.

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

Public Hearing

Pursuant to statute⁸ and Commission Policy 2.000, a public hearing chaired by the Executive Director was held on September 18, 2023. JMCSS's presentation at the public hearing focused on the process the district and its review committee took upon receiving the application, as well as the reasons for denial of the amended application. Representatives from JMCSS indicated that ACAJM's amended application was denied based on deficiencies found within the academic plan including the curriculum not aligning with Tennessee Academic Standards, Response to Instruction and Intervention plans lacking details related to implementation, and the applicant failing to provide a distinct process for measuring progress towards academic goals. Additionally, the district stated that the application did not clearly describe the community from which the school intends to draw students, and that the facility plans did not provide sufficient space for the educational program and anticipated student population. Further with no specified area identified, there was no detailed plan for a facility location, or specifics related to building, buying, or leasing a facility. The district cited seventy-four reasons for denial and concluded that the application did not reflect a thorough understanding of key issues and the application lacked specific and accurate information.

In the sponsor's opening statement, representatives from ACAJM stated that a charter school should be approved "if the Commission finds that the application meets or exceeds the metrics in the Department of Education's scoring rubric and that approval of the application is in the best interests of the student, LEA, or community." The sponsor set forth the reasons for which they believe that their application was wrongfully denied, including that the academic plan for ACAJM lays out a content rich education in liberal arts and science paired with civics. The applicant also cited that Rutherford County's Board of Education found that the applicant's same proposed academic plan met standards for approval. Further, the applicant cites that the curriculum proposed by ACAJM is shown to produce

⁸ T.C.A. § 49-13-108

proficiency rates in ELA and Math across diverse student groups. For operations, the applicant cited detailed plans for pre-opening, staffing, and community engagement and detailed how the governing board would continually evolve to include more Tennessee residents with diverse backgrounds. The applicant continued to describe how the authorization of ACAJM would create more opportunities and choice for parents, which was cited as particularly important in Madison County due to the school system losing student enrollment. The identified school leader then explained the academic program for the school, the core tenets of a classical education, and how they will be implemented at ACAJM. The sponsor stated that the proposed school intends to offer a rigorous academic option to students so that they are not only intellectual, but also virtuous. The sponsor closed by focusing on providing an academic program about what is true, good, and beautiful, while utilizing primary source documents and Socratic dialogue, consistent with a classical model.

During questioning by the Commission, JMCSS first described the projected growth the district anticipates seeing because of Blue Oval City, which is projected to account for an overall enrollment increase of 8.1% district wide, and 2.1% projected growth in East Jackson. JMCSS then answered questions related to the process taken by its review committee to determine initial and final ratings of the submitted application. The district clarified the reason for adding additional members to the review committee for the amended application, the manner that the ad hoc committee interacted with the review committee, and how the district worked to resolve issues that came up to ensure the integrity of their process. The ultimate recommendation to the board was based on the work of the review committee, with the ad hoc committee primarily responsible for the financial impact portion. The district then addressed questions related to the reasons for denial and why the reasons for denial increased between the initial and amended application. The district clarified that upon receipt of the amended application, the applicant added approximately 80 pages to address preliminary comments. These additions created additional concerns, particularly related to the implementation of RTI² and the specific location the school proposes to locate. When questioned about the variance between amounts used to substantiate substantial negative fiscal impact. When asked about the substantial fiscal impact calculated by the district and the significantly different amounts cited by the district, JMCSS clarified that the cause for the increase was due to an increase in funding under TISA in FY24. Also, the calculation included fixed costs related to transportation, staffing, services to special populations, and food services, since according to the district, they would be unable to adjust these costs as a result of students transferring to ACAJM. In closing, the district addressed questions surrounding early conversations that took place between ACAJM and the JMCSS superintendent. The district confirmed that conversations occurred regarding potential facilities; however, these conversations were independent of what the review committee reviewed.

The Commission then questioned the sponsor beginning with a question surrounding individuals being hesitant to express interest in the school due to fear of backlash from the district. In response to this question, network staff spoke to creating opportunities where ACAJM can have conversations with the community to address questions. Next, ACAJM addressed questions related to its capacity to open more than one school at a time, to which the applicant spoke to the fact that they could exercise their right to delay the opening of the school for one (1) year as a contingency plan and expressed confidence in the local representation on their board to further bolster their capacity. The applicant then addressed questions surrounding why they selected East Jackson as the proposed geographic region, updates to the timeline and facilities based on the appeal, and enrollment targets. Within these lines of questioning, ACAJM stated that they believe that a charter school in East Jackson would increase options for students, and this geographic region was initially selected based on early discussions with the JMCSS Superintendent. ACAJM also discussed the conversations that they are having with the County Commission regarding a pre-existing facility. Should this facility not be available, the applicant has identified three other options that work within their plan and contingency timeline. Lastly, when addressing questions regarding enrollment projections, the applicant

expressed confidence that enrollment targets of 340 students in Year 1 would be met, but ultimately the school could be viable with as few as 150 students. Per the applicant group, there is a deep pool of families that are interested in the model, which includes not only traditional public school families, but also families that are sending their children to private schools or homeschooling.

The public hearing concluded with closing statements by both parties and the receipt of 19 in-person comments, with ten (10) speaking in support of JMCSS and nine (9) speaking in support of ACAJM. The Commission also accepted written comments, and the Commission received 70 written comments, with 21 writing in support of JMCSS and 49 writing in support of ACAJM.

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 department of education’s application-scoring rubric and⁹,” whether “approval of the application is in the best interests of the students, LEA, or community¹⁰.” In addition, pursuant to T.C.A. § 49-13-108, the Commission adopted the State Board of Education’s quality public charter schools 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 JMCSS, 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 explicated in the report, I agree that the ACAJM amended application did rise to the level of meeting or exceeding the standards required for approval.

There are two differentiating strengths within the ACAJM application that are notably different than the other application on appeal from the same sponsor in a different district. The first strength is an identified school leader who has experience in the academic model and has expertise to implement the academic, operational, and financial plans outlined in the application. The second strength is an identified community within Madison County where the sponsor proposes to locate the school. Within the application, the sponsor set forth an academic plan with a clear mission and vision. While it is not a requirement to have a school leader named at this point in a school’s opening, the sponsor has proposed a plan that rests heavily on the experience and knowledge of the school leader, and many key decisions within the academic plan lie with the school leader. In this appeal, the proposed school leader, Ms. Alex Spry, was able to articulate a vision for American Classical Academy Jackson Madison that supports the plan laid out in the amended application. Additionally, the review committee and Commission staff had the ability to evaluate this individual’s expertise and capacity to implement the proposed model, and within the capacity interview, she provided significant detail that bolstered the outlined plans in the application.

With a school leader in place to navigate the pre-opening process, I am confident that Ms. Spry understands the obligation to ensure that the school’s curriculum and assessments align to Tennessee Academic Standards. The question of the curriculum’s alignment to the state’s standards was specifically addressed within the Commission’s capacity interview with the sponsor, and the network staff and school leader clearly understood the need to finalize the curriculum crosswalk well in advance of the school opening and to identify and fill in any gaps. While the district cited concern with some instructional materials named within the application not being on the state’s approved list,

⁹ T.C.A. § 49-13-108(5)(D)

¹⁰ *Id.*

it is important to note that charter schools, like school districts, may apply for a waiver to use non-State Board of Education approved textbooks and materials. These waivers are commonly requested by and granted to both charter schools and districts.

The Commission expects that all charter schools it approves executes an academic model that includes a comprehensive plan for all students, including students with disabilities and English Learners. Ms. Spry has significant experience and expertise in implementing services to students from special populations, and within the capacity interview, she spoke to the sponsor's plan with regard to instructional plans for the future students. Additionally, the school leader has experience in establishing a school with a classical academic model serving a diverse community. Since the school leader shoulders great responsibility within this model, Ms. Spry's explanation of the proposed academic plan at the capacity interview and public hearing increased my confidence in recommending approval of this application.

Additionally, this application makes a strong case for approval because there has been a location identified. The sponsor explained that East Jackson has been selected as a location for this school, if approved. With a location identified, the sponsor has the ability to target its marketing, recruitment, and enrollment plans, and the Commission can evaluate the evidence provided by the sponsor. Under Ms. Spry's leadership, the sponsor has employed a Community Engagement Director to lead the recruitment with residents in East Jackson. Ms. Spry will be responsible for the marketing campaign and student enrollment, but materializing enrollment is a challenge for any new public charter school. While I appreciate the sponsor's confidence in meeting their Year 1 enrollment goal, the sponsor was able to provide detail as to how many students it would need to enroll to open successfully. Being the first charter school in a school district will be a challenge for the school in terms of student enrollment. However, Ms. Spry has experience in navigating the opening of a new charter school, and I believe there is a greater chance of the school to meet its enrollment targets with an identified location.

Operationally, the strengths of this application continue to be the identification of a school leader with proven experience and the identification of a community for the school. Within the model, the school leader reports directly to the governing board who is responsible for ensuring fidelity to the model and compliance with the law. However, the school leader is responsible for most academic, operational, and financial decisions and implementation at the school. The lean network staff confirmed within the capacity interview that their role is to support the governing board, not the school. Based on this organizational structure decision by American Classical Education, the success and/or failure of American Classical Academy Jackson Madison will weigh significantly on the skill and expertise of the school leader. During the capacity interview, I appreciated the intentionality of the school leader when she explained the intended professional development for staff and plans for staff recruitment. I believe that the sponsor may find teacher recruitment to be a particular challenge, as this is a specialized academic model and there is a nationwide teacher shortage. However, with a school leader already in place, ACAJM can begin recruitment for staff immediately, if approved.

Another factor for consideration by this Commission and in my recommendation for approval is the facility plan. This is a standard that is met in this application because ACAJM has made significant progress on its facility plan within its proposed location. The sponsor has identified multiple options for facilities in East Jackson. The sponsor has engaged the services of Bouma USA for support in construction and renovation where necessary. Additionally, the sponsor has been engaged in conversation with city and county officials to identify available locations within the targeted area. As the Commission has experienced in past appeals, a sponsor who has not identified a location and/or facility options will have a more challenging time opening on schedule with the application, which can create additional considerations as this decision colors recruitment, enrollment, and family engagement.



Upon review of all applications before the Commission this cycle, there are waivers consistently sought by applicants that are not applicable to current law or not necessary for successful operation of a school. This is a common error across most applications, but, if approved, the Commission staff reviews all waiver requests and works with each operator to include only the necessary and relevant waivers as an exhibit to the charter agreement.

I believe the sponsor's financial plan meets standard for approval. The sponsor presented a sound financial plan as well as evidence of support to establish the school in opening and initial scaling. Although the budget presented does not rely on funds from the American Classical Education Foundation, I believe that the sponsor's support from that organization provided me with additional assurance in the Financial Plan and Capacity. The sponsor's budget contains reasonable start-up costs and projections that are conservative as the school scales in size. Unanticipated expenses will occur as the sponsor begins to work towards opening and as enrollment materializes. I am confident that the sponsor has the systems in place to be prepared for these occurrences and will be able to navigate those challenges, if approved by this Commission.

Finally, I want to address the sponsor's comments within both the capacity interview and public hearing that it will seek to delay the opening of ACAJM for one academic year, if approved. This is permissible for any operator under T.C.A. § 49-13-110(b). However, no authorizer may approve an application with conditions, even if the condition is to delay one academic year. Therefore, the basis of my recommendation and the question before the Commission is whether the presented application is ripe for approval with an opening of the 2024-25 school year. With an identified school leader and an identified community for the school, I determine that the proposed school could open in August 2024 based on the application currently before the Commission.

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. Based on the totality of the evidence within this appeal, including the amended application and the capacity interview with the sponsor, I determine that the application has met or exceeded the standard for approval. For the reasons expounded on in this report, I recommend that the Commission approve the ACAJM amended application.

CONCLUSION

For these reasons, and for the reasons stated in the Review Committee Report attached hereto as **Exhibit A**, I do believe that the decision to deny the amended application for American Classical Madison was contrary to the best interests of the students, the LEA, or the community. Therefore, I recommend that the Commission approve the amended application for American Classical Academy Madison.

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

Tess Stovall, Executive Director
Tennessee Public Charter School Commission

10/2/23
Date



EXHIBIT A

Charter Application Review Committee Recommendation Report

October 5, 2023

School Name: American Classical Academy Madison

Sponsor: American Classical Education

Proposed Location of School: Jackson-Madison County Schools System

Evaluation Team:

- Kristine Barker
- Kathryn Bridges
- Trent Carlson
- Beth Figueroa
- Susie Smith
- Clare Vickland

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 (“Charter Commission”). In accordance with T.C.A. § 49-13-108, the Charter Commission shall conduct a de novo, on the record review of the proposed charter school’s application, and Charter Commission has adopted national and state quality authorizing standards to guide its work. As laid out in Charter Commission Policy 3.000 – Core Authorizing Principles, the Charter 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 Charter Commission adopted Charter Commission Policy 2.000 – Charter School Appeals. The Charter Commission has outlined the charter school appeal process to ensure the well-being and interests of students are the fundamental value informing all Charter Commission actions and decisions. The Charter 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 Charter 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 Charter Commission’s charter application review process is outlined in T.C.A. § 49-13-108, Charter Commission Policy 2.000 – Charter School Appeals, and Charter Commission Policy 2.100 – Application Review. The Charter 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 Charter Commission provided training to all review committee members to ensure consistent standards and fair treatment of all applications.

Overview of the Evaluation Process

The Tennessee Public Charter School 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 three sections of the application: Academic Plan Design and Capacity, Operations Plan and Capacity, and Financial Plan and Capacity.
2. **Capacity Interview:** Based on the independent and collective review of the application, the review committee conducted a 90-minute interview with the sponsor, members of the governing board, and identified school leader to address the concerns, weaknesses, and questions identified in the application, and to assess the capacity to execute the application’s overall plan.
3. **Consensus Judgment:** At the conclusion of the review of the application and the capacity interview, the committee submitted a final rubric and developed a consensus regarding a rating for each section of the application.

This recommendation report includes the following information:



1. Summary of the application: A brief description of the applicant’s proposed academic, operations, and financial plans.
2. Summary of the recommendation: A brief summary of the overall recommendation for the application.
3. Analysis of each section of the application: An analysis of the three sections of the application and the capacity of the team to execute the plan as described in the application.
 - a. Academic Plan Design and Capacity: school mission and goals; enrollment summary; school development; academic focus and plan; academic performance standards; high school graduation standards; assessments; school schedule; special populations and at-risk students; school culture and discipline; marketing, recruitment, and enrollment; community involvement and parent engagement; and the capacity to implement the proposed plan.
 - b. Operations Plan and Capacity: governance; start-up plan; facilities; personnel/human capital; professional development; insurance; transportation; food service; additional operations; waivers; and the capacity to implement the proposed plan.
 - c. Financial Plan and Capacity: budget narrative; budgets; cash flow projections; related assumptions; financial policies and procedures; and the capacity to implement the proposed plan.

The Charter Commission’s charter application review committee utilized the Tennessee Department of Education’s Charter School Application Evaluation Ratings and Sample Scoring Criteria (“the rubric”), which is used by all local boards of education when evaluating an application. The rubric states:

An application that merits a recommendation for approval should present a clear, realistic picture of how the school expects to operate; be detailed in how this school will raise student achievement; and inspire confidence in the applicant’s capacity to successfully implement the proposed academic and operational plans. In addition to meeting the criteria that are specific to that section, each part of the proposal should align with the overall mission, budget, and goals of the application.

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

Rating	Characteristics
Meets or Exceeds Standard	The response reflects a thorough understanding of key issues. It clearly aligns with the mission and goals of the school. The response includes specific and accurate information that shows thorough preparation.
Partially Meets Standard	The response meets the criteria in some aspects, but lacks sufficient detail and/or requires additional information in one or more areas.
Does Not Meet Standard	The response is significantly incomplete; demonstrates lack of preparation; is unsuited to the mission and vision of the district; or otherwise raises significant concerns about the viability of the plan or the applicant’s ability to carry it out.



Summary of the Application

School Name: American Classical Academy Madison

Sponsor: American Classical Education

Proposed Location of School: Jackson-Madison County School System

Mission:¹ The mission of American Classical Academy Jackson-Madison (ACAJM) is to train the minds and develop character in students through a content-rich Classical Education in the liberal arts and sciences utilizing instruction in the principles of moral practices and civic virtue.

Number of Schools Currently in Operation by Sponsor: There are no schools currently in operation by the sponsor. The sponsor currently has one (1) charter school authorized by Rutherford County Schools, scheduled to open in the 2024-2025 school year.

Proposed Enrollment:²

Grade Level	Year 1: 2024-2025	Year 2: 2025-2026	Year 3: 2026-2027	Year 4: 2027-2028	Year 5: 2028-2029	At Capacity:
K	60	60	60	60	60	60
1	60	60	60	60	60	60
2	60	60	60	60	60	60
3	60	60	60	60	60	60
4	50	50	50	50	50	50
5	50	50	50	50	50	50
6	0	50	50	50	50	50
7	0	0	50	50	50	50
8	0	0	0	50	50	50
9	0	0	0	0	50	50
10	0	0	0	0	0	50
11	0	0	0	0	0	50
12	0	0	0	0	0	50
Totals	340	390	440	490	540	690

Brief Description of the Application:

The sponsor, American Classical Education, is proposing to open a charter school in Madison County, Tennessee and serve students in kindergarten through 12th grade when fully built out. The school, American Classical Academy Madison, is a new-start school and would be the second school for the sponsor. The school intends to operate in the East Jackson community of Madison County to “provide an excellent alternative educational pathway for families and students, meeting the needs of students who are not doing well in the traditional setting and may not have the previous high academic achievement required for entry into one of JMCSS’s magnet schools.”³

¹ Amended Application, pg. 13

² Ibid, pg. 36

³ Ibid, pg. 30



The proposed school will be governed by the sponsoring entity, American Classical Education, “an independent nonprofit organization developed to govern ACE classical schools in Tennessee.”⁴ In Year 0, American Classical Academy Madison has budgeted \$250,000 from the Charter Schools Program Grant and projects \$349,610 in expenses for the school. American Classical Academy Madison projects the school will have \$4,117,681 in revenue and \$3,993,055 in expenses in Year 1, resulting in a balance of \$225,015. By Year 5, the school projects to have \$5,994,378 in revenue and \$5,676,445 in expenses, resulting in a positive ending fund balance of \$1,531,347.⁵ The school anticipates that 45% of the student population will qualify as economically disadvantaged, 15% of the student population will be students with disabilities, and 6% of the student population will be English Learners.⁶

⁴ Ibid, pg. 135

⁵ Amended Budget

⁶ Amended Application, pg. 37



Summary of the Evaluation

The review committee recommends the approval of the amended application for American Classical Academy Madison (ACAJM) because the applicant has a clear plan for serving the students in East Jackson, has identified a school leader with deep experience in implementing the classical instructional model, and has demonstrated financial commitments that are sufficient to support the school as it scales.

The academic plan presented by the applicant meets or exceeds the standard because of the clearly identified community within Madison County for the proposed school. In the application and capacity interview, the applicant demonstrated support for the proposed school within the community the school intends to locate, along with clear community engagement efforts affirmed by letters of support and canvassing specifically in East Jackson. Additionally, given the organizational structure of the American Classical Education model, the model relies on a strong and experienced school leader for successful implementation of the academic model. ACAJM has identified a school leader who has experience in successfully opening a Barney Charter School Initiative (BCSI) affiliated charter school in Florida, and she was able to speak to areas within the application, such as service of special populations, assessments, and school culture, to provide further clarity. The school leader demonstrated deep knowledge of the instructional model, curriculum, and professional development supports provided to teachers to successfully carry out the academic model, and she discussed how instruction would be differentiated and special populations of students would be identified and monitored. The proposed school leader also demonstrated expertise in developing and implementing a successful school culture plan that focuses on character development and academic success. Due to the totality of the evidence presented in the application and capacity interview, the review committee determined that the Academic Plan and Capacity meets the standard.

The applicant's operations plan meets or exceeds standard as the application outlines detailed start-up and facility plans that align with the community of East Jackson. The applicant plans to partner with a reputable company who has a track record of supporting charter schools in facility projects. While the school has not yet secured a specific facility, the applicant has identified multiple viable options within the identified community and is in discussions with the County Commission and with real estate firms to ensure the ability to execute a facility option upon authorization. The network proposes a model that is almost exclusively principal-led and so the identification of a competent and experienced leader was found to be paramount to the applicant's ability to open successfully. The identification of a proposed school leader for ACAJM was deemed a strength from an organizational perspective as she was able to speak to staffing, professional development, and robust recruitment plan, which will be essential to ensure the execution of the instructional model with fidelity. Additionally, the identification of a school leader ensures time sensitive items related to start-up activities remain on track.

The financial plan is comprehensive and includes reasonable assumptions that support the start-up expenses. This is a result of the sponsor drawing from historical financial data from other operational BCSI schools and actual quotes from service providers. The operating budget is strengthened by the additional support from American Classical Education Foundation, which includes access to no-interest loans and a line of credit sufficient to cover any potential budgetary shortfalls experienced due to a lack of charter school start-up grant funds, enrollment targets not being met, facility related expenses, or the cost of scaling programs.

Summary of Section Ratings

In accordance with the Tennessee Department of Education’s charter application scoring rubric, applications that do not meet or exceed the standard in all sections will be deemed not ready for approval⁷ 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	Rating
Academic Plan Design and Capacity	Meets or Exceeds Standard
Operations Plan and Capacity	Meets or Exceeds Standard
Financial Plan and Capacity	Meets or Exceeds Standard

⁷ Tennessee Charter School Application Evaluation Rubric – Ratings and Scoring Criteria

Analysis of the Academic Plan Design and Capacity

Rating: Meets or Exceeds Standard

Strengths Identified by the Committee

The applicant's Academic Plan Design and Capacity meets the standard because the applicant clearly details how the proposed academic model will meet the needs of the students within the identified community of East Jackson. Additionally, the identified of a school leader with clear experience implementing the academic model bolstered the application's academic plan provided within the application.

The plan includes a clear process to ensure that students are learning the necessary academic content within the classical instructional model with an emphasis on literacy instruction and ability-level grouping for differentiated instruction. The school leader, Ms. Alex Spry, provided the review committee additional details to further build on aspects of the application related to service of special populations of students, assessments, and school culture. This school leader demonstrated the needed capacity and experience to implement the proposed classical education model in East Jackson. The application also contained evidence of community partnerships to support the proposed enrollment structure and overall successful implementation of the academic model.

Within the application, ACAJM outlines an academic plan that aligns with its mission and vision for delivering a classical model to students in East Jackson. The applicant states that the school's academic performance will be monitored through regular assessments, with students supported through differentiated ability groupings and RTI². In the capacity interview, the proposed school leader described a clear philosophy for selecting an assessment plan and outlined the process of ensuring alignment between both the curriculum and assessments to Tennessee Academic Standards. This was further reinforced by the applicant's understanding that while having flexibility in selecting curriculum, teaching Tennessee Academic Standards is required. The proposed school leader demonstrated deep knowledge and experience in successful implementation of the academic model, and the review committee determined that the model is likely to be successful with the identified community because of the emphasis on literacy and devoting significant time in students' daily schedules to receive literacy instruction. Additionally, the proposed school leader spoke both to her experience and the school's plan to ensure appropriate service of special populations and differentiated instruction. During the capacity interview, Ms. Spry elaborated on the identification and monitoring process for special populations of students. The additional details provided by the ACAJM school leader within the capacity interview helped the review committee better understand the school's plan for successfully supporting all students in alignment with the proposed academic model as well as state and federal requirements.

The proposed school leader has extensive experience in the school's academic model and the operational leadership necessary to implement the academic plan to support high-quality instruction. During the capacity interview, Ms. Spry clearly outlined the instructional coaching structures that will be in place, such as weekly data meetings with teachers to review data and respond to support student learning. Moreover, the academic growth results at the school Ms. Spry led in Florida speak to her leadership and instructional coaching abilities, particularly for a diverse community of learners. ACAJM will be a BCSI member school and as such will receive similar supports in professional development. While having a school leader selected is not an application requirement, the network's model is largely reliant on the strength of the identified school leader who would oversee implementation of the academic, operational, and financial plans of the school. The information provided by the proposed school leader in the capacity interview gave the review committee sufficient detail to determine that the academic plan met standard, and this is particularly important given the level of autonomy and decision-making that falls to the individual leader at an American Classical Education school.



While the application clearly sets out high expectations for student character and virtues, the identified school leader was able to provide additional details beyond the plan within the application to address how school culture would be built and school discipline would be implemented. During the capacity interview, the proposed school leader spoke to her experience analyzing student behavior to put the proper support in place to improve student achievement. Additionally, she spoke of her passion for equipping students with the tools they need to be successful academically and in areas of character development; both key components of the classical education model. It was clear to the review committee that the school leader has relevant experience in both launching and successfully leading a similar classical education school serving a diverse community with a strong school culture and positive learning environment. This led the review committee to determine that the school would develop and maintain a positive school culture and behavior system.

Finally, the identification of a specific community within Madison County to locate the proposed school is a clear strength within the application. Both within the application and in the capacity interview, the applicant spoke to specific community canvassing and engagement that has already occurred, and this was validated by letters of support from the community within the application. Several team members, in addition to a Community Engagement Director, are conducting door-to-door conversations with residents of East Jackson. Additionally, upon authorization, the identified school leader will be on the ground and leading outreach in Madison County in order to ensure the proposed enrollment targets are met. Ms. Spry previously conducted similar activities for the BCSI-affiliated school that she successfully launched. At the time of the capacity interview, ACAJM stated that they have approximately 150 students whose parents or guardians have expressed interest in enrolling their school-age children and those numbers are expected to increase upon authorization.

Analysis of the Operations Plan and Capacity

Rating: Meets or Exceeds Standard

Strengths Identified by the Committee

The applicant's Operations Plan Design and Capacity meets or exceeds the standard because the proposed school presented a detailed start-up and facility plan that aligns to the proposed community location. The identification of a school leader with the expertise and ability to execute the operational plan further bolstered the operational plan presented within the application. The school leader has clear experience in developing and executing a strong staffing and professional development plan and has demonstrated capacity for operational success.

The facility plans for the school, along with the identified community, were found to meet standard for approval because the application outlines a sound facility development plan including multiple options for facilities within East Jackson. Additionally, the applicant provided details, both within the application and the capacity interview, about sufficient progress toward identifying a facility that they can open in the targeted geographic region. The applicant plans to partner with Bouma USA, a company with a successful track record of supporting charter schools in the construction and renovation of school facilities. While the school has not yet finalized a facility option, they have identified multiple viable options and are actively engaged with the County Commission and local real estate firms. In addition to a strong facilities plan, the review committee found the applicant's start-up plan to be detailed and adequately addressed potential challenges including staff hiring and student recruitment. The applicant has already met many of the indicators on the start-up plan, including identifying a school leader and actively canvassing the neighborhoods to begin recruiting students. These plans were further strengthened by the detailed checklist which identified the person responsible for specific start-up activities and the support that will be provided by BCSI, which is experienced in supporting schools in pre-opening activities. Additional BCSI supports will include additional training for new school leaders, facilitation of visits to other BSCI-supported schools, and curriculum support.

Within the application and capacity interview, ACAJM presented an operational model and structure that places significant importance and autonomy on the leader selected to be Head of School. The proposed school leader for ACAJM is responsible for not only the academic performance and implementation of the classical model of education, but also for important operational functions including, but not limited to staffing, budget management, procurement, legal, and human resources. Due to this, the review committee found the academic and operational success hinged on the identification of the right school leader. While the identification of a school leader is not a requirement outlined within the rubric, due to the network's model, the identification of an experienced school leader is a clear operational strength for ACAJM. During the capacity interview, the school leader spoke to core components of the staffing and professional development plan, which include both summer BCSI training coupled with in-house created content that is offered on a weekly and monthly basis. If approved, the school will need to focus on recruiting a sufficient number of qualified teachers who have a broad understanding of the classical liberal arts. However, the application outlined a robust staff recruitment plan, led by the identified school leader, and during the capacity interview, the applicant was able to speak to teachers that have already proactively reached out inquiring about positions.

While the school leader is responsible for most, if not all, decisions impacting the school including academic, operational, and financial success, the governing board plays an important role in oversight of ACAJM. The proposed board was found to be composed of a group of proven local leaders with diverse backgrounds and experience, who, paired with the chosen school leader, were found to be prepared to ensure fidelity to the model and compliance within the organization. While the application outlines a robust plan for holding the school leader accountable for the



school's academic and operational performance, Ms. Spry was found to possess the requisite expertise, experience, and knowledge necessary to lead ACAJM. During the capacity interview, the applicant spoke to the additional supports that would be put in place by the governing board should the school leader struggle, providing additional confidence in the school's ability to operate successfully.

Analysis of the Financial Plan and Capacity

Rating: Meets or Exceeds Standard

Strengths Identified by the Committee

The applicant's Financial Plan Design and Capacity meets or exceeds the standard because the operating budget includes comprehensive and reasonable assumptions that are necessary to support the start-up expenses for the school and incorporates financial support from American Classical Education Foundation that is sufficient to support the school on an as needed basis as it scales. The review committee found that the applicant's budget includes reasonable assumptions for the related costs of opening a new charter school including staffing, contracted services, and supplies based on the use of financial data from other operational member schools and quotes from service providers.

The application includes a letter of support from American Classical Education Foundation, which states that the foundation is willing to provide a no-interest loan in the amount of \$750,000 to ACAJM upon authorization of its charter to offer start-up financial support should federal Charter School Program (CSP) funds not be awarded. Additionally, the Foundation expressed willingness to offer an additional no-interest revolving line of credit of up to \$1 million if funds provided by the CSP grant or \$750,000 no interest loan are insufficient to meet start-up needs. The school would have access to these funds for the first five (5) years of operations. During the capacity interview, the review committee confirmed that the school continues to have access to these funds and that the foundation is committed to ensure the charter school's long-term success and financial solvency. Having access to these funds provides assurance that initial expenses will be funded at appropriate levels and that the school will have access to the necessary capital to ensure positive cash flow.

Moreover, the budget incorporates complete and reasonable start-up costs, while the five (5)-year financial projections are based on reasonable budget estimates that are consistent with the academic and operational plan outlined within the application. The cost assumptions used within the budget reflect positions included in the staffing plans with other spending categories reflecting amounts consistent with other BCSI member schools. The review committee determined another strength in the budget is that contracted services were based on quotes from service providers, further strengthening the committee's confidence in the accuracy of the financial projections. While the school has access to funds from the American Classical Education Foundation, the projected budget and cash flow does not present reliance on these funds and projects the school projects it will be financially sustainable on state and federal funds after Year 1.



Evaluation Team

Kristine Barker has over fifteen years of experience designing and implementing solutions to improve outcomes for students from the school, CMO, district and state levels. Kristine has a focused skill set in developing and executing on innovative solutions to improve education policies and practices. At the state level, she was responsible for designing and refining authorization and oversight processes for all schools, sites and programs within the Office of School Choice. She served as the state's charter authorizing content expert for state and local charter schools, overseeing the charter application, opening, and school transition processes. She led cross-departmental collaboration within the Department of Education, assisting local superintendents throughout the state, and leading frequent informational sessions for potential applicants. At the district level, Kristine developed innovative long-term portfolio strategies to meet the needs of the public school system and leveraged data to drive policy and practices to ensure stability and long-term success of the district. She oversaw the charter application process from recruitment, application, and school opening processes, continually improving equity and transparency.

Katie Bridges is the Special Populations Coordinator for the Tennessee Public Charter School Commission. She has 14 years of experience serving in teaching and administrative roles in charter schools in Nashville, Tennessee. Before her work at the Commission, Katie was a founding Assistant Principal of Student Supports at a charter middle school. Katie received a M. Ed. in Curriculum and Instruction from Trevecca University and a B.A. in psychology and communications from the University of Tennessee at Chattanooga.

Trent Carlson is the Authorizing Coordinator for the Tennessee Public Charter School Commission. Prior to joining the Commission, Trent worked in Nashville schools as a middle school teacher in both the public school district and a local public charter school. Trent was a Teach for America corps member and a Leadership for Educational Equity policy and advocacy summer fellow. Trent received an M.Ed. from Lipscomb University and a B.A. from the University of Alabama, where he studied Journalism, Political Science, and History.

Beth Figueroa is the Director of Authorizing for the Tennessee Public Charter School Commission. She is a Certified Public Accountant and has spent the last 15 years specializing in school finance and charter school oversight. Before working at the Commission, Beth worked as an administrator and charter school authorizer in California. She has also had the opportunity to serve as the Chief Business Officer of a charter school, an Executive Director of Fiscal Services for a school district with an annual budget of over \$500 Million, and an auditor of charter schools and non-profit organizations. She earned her Master of Business Administration degree from California Baptist University, where she also received her B.S. in Business Administration and serves as an adjunct professor teaching Government and Non-Profit Accounting.

Susie Smith is a recently retired Charter School Oversight Administrator from Riverside County Office of Education, in Southern California, acting as an authorizer on the behalf of the Riverside County Board of Education. Her work has been to provide high-quality charter school options for students, families, and communities by providing a rigorous and comprehensive charter petition process. She continues to ensure that all reviews include the appropriate level of due diligence. She has promoted effective oversight of all approved charter schools in Riverside County by closely monitoring academic performance and non-academic outcomes, such as finances and governance. Her clear and transparent reporting on public charter school performance of all approved charter schools in the region has left the public better informed about locally operating charter schools.

Clare Vickland has over fifteen years of experience in the charter school sector, focusing on special populations. She is currently working as an independent education consultant and her clients include state and local charter school authorizers, independent charter schools, and school districts. Clare specializes in high impact leadership and



instructional coaching, systems evaluation and development, charter school authorization, project management, and advocacy for students with disabilities. Previously, Clare worked at the Colorado Charter School Institute as the Director of Student Services and Professional Learning for 6 years after serving as a classroom teacher, special education teacher, instructional coach, and school leader in Denver-area charter schools before relocating to Nashville. Clare holds a B.S. in Special Education from Vanderbilt University and her M.Ed. in Risk and Prevention from the Harvard Graduate School of Education.