



Executive Director's Recommendation

American Classical Academy Maury 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 August 7, 2023, the sponsor of American Classical Academy Maury ("sponsor") appealed the denial of its amended application by the Maury County Public Schools (MCPS) 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 Maury (ACAM) amended application was not contrary to the best interests of the students, the LEA, or the community.¹ Therefore, I recommend that the Commission uphold the decision of MCPS Board of Education to deny the amended application for American Classical Academy Maury.

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 ACAM'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 MCPS expressing its intention to file a charter school application.
2. The sponsor submitted its initial application for ACAM to MCPS on February 1, 2023.
3. MCPS assembled a review committee to review and score the ACAM initial application.
4. On April 17, 2023, MCPS's review committee conducted a capacity interview with representatives of ACAM.

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. MCPS's review committee reviewed and scored the ACAM initial application and recommended to the MCPS Board of Education that the initial application be denied, indicating that the application only partially met standards for academic plan, operations plan, and financial plan.
6. On April 25, 2023, MCPS Board of Education voted to deny the ACAM initial application based on the review committee's recommendation and substantial negative fiscal impact.
7. The sponsor, as requested, answered questions relating to deficiencies cited by individual MCPS Board of Education members regarding the application for ACAM to MCPS on May 30, 2023, rather than submitting an amended application.
8. On July 18, 2023, the MCPS Board of Education voted 5-4 in support of approving the application of ACAM. Since there were not six votes in the affirmative, the vote was insufficient to be binding.
9. On July 27, 2023, the MCPS Board of Education reconvened and voted 6-5 to deny the ACAM application.
10. The sponsor appealed the denial of the ACAM amended application in writing to the Commission on August 7, 2023, including submission of all required documents per Commission Policy 2.000.
11. The Commission's review committee independently analyzed and scored the ACAM amended application using the Tennessee Department of Education's charter school application scoring rubric.
12. The Commission's review committee conducted a capacity interview with key members of the ACAM leadership team on September 8, 2023 via Microsoft Teams.
13. On September 21, 2023, the Commission staff held a public hearing at Horace O. Porter School in Columbia, Tennessee. At the public hearing, the Executive Director, sitting as the Commission's Designee, heard presentations from the sponsor and MCPS public comment regarding the ACAM application.
14. After the capacity interview, the Commission's review committee determined a final consensus rating of the ACAM application, which served as the basis for the Review Committee Recommendation Report, attached hereto as **Exhibit A**.
15. The Commission staff conducted a full review of the record which includes the initial and amended applications submitted by the sponsor, documentation submitted by MCPS, 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 27, 2023 board meeting, the MCPS Board of Education voted to deny the application of ACAM. Within the resolution, the Board cited specific reasons for denial contained in a letter that outlined individual board members' concerns and was reflective of the general discussion of the board at the meeting. However, the resolution that was ultimately signed by the board chair incorporated not only the individual board members' individual findings, but also cited a finding of a substantial negative fiscal impact to Maury County Public Schools, such that the authorization of the proposed public charter school would be contrary to the best interests of the Maury County Public Schools, its students, and the general community of Maury County. 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 the burden is on the local 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. In the case of the MCPS, the citing of substantial negative fiscal impact was not discussed by the MCPS Board as a part of their deliberations on the application nor was the resolution formally adopted by the majority of the board members. However, since the resolution is signed by the then MCPS board chair and contained language consistent with Commission Rule, the Commission moved forward with conducting due diligence related to fiscal impact such that it is clear to all parties whether a substantial negative fiscal impact exists for MCPS, should the school open and operate within this geographic region.

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 ACAM:

1. ACAM's amended application states that in the 2024-25 school year, ACAM's first anticipated year of operation, it will enroll a maximum of 340 students.⁵
2. Commission staff requested from MCPS 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. At the public hearing, the Superintendent spoke to the north-end of the county growing exponentially when compared to other parts of the county, but more recently the district has experienced growth across all parts. Specifically, Spring Hill has seen the largest growth, with Columbia starting to experience growth, in addition to Mount Pleasant due to new developments.

Table 1. Historical ADM and System Growth⁶

	Actual ADM	% Growth From Previous Year	Projected Student Growth	Actual Student Growth
SY 23-24	12,747	1.28%	119	161
SY 22-23	12,586	0.59%	-47	74
SY 21-22	12,512	0.97%	526	120
SY 20-21	12,392	-1.12%	N/A	-140

3. According to the resolution denying the ACAM application, the district states that the Board of Education finds that the establishment of the proposed charter school would have a substantial negative fiscal impact to Maury County Public Schools, such that the authorization of the proposed public charter school would be contrary to the best interests of the Maury County Public Schools, its students, and the general community of Maury County. However, the deliberation by the board of education did not include discussion specific to substantial negative fiscal impact nor was a specific amount of fiscal impact presented to the board within

⁵Initial Application, pg. 33

⁶ All data provided by Maury County Public Schools in response to the Commission's September 22, 2023 request for information.

the resolution or included as a part of any presentation to the board upon review of the initial application. Instead, the resolution citing substantial negative fiscal impact was presented to the board immediately following the vote on the ACAM application, with the language surrounding fiscal impact pre-populated by the district’s legal counsel. Furthermore, the district has not provided its own calculation and estimate of the fiscal impact to the district and instead used the state and local allocations included within ACAM’s application budget template as the basis for the district’s calculation and determination of substantial negative fiscal impact.

- The Commission staff reviewed the district’s past audits and gathered the unassigned fund balance since 2019-20.

Table 2. Unassigned Fund Balance⁷

	Unassigned Fund Balance	% Growth From Previous Year
SY 21-22	\$19.4 Million	11%
SY 20-21	\$17.5 Million	55%
SY 19-20	\$11.3 Million	29%

- The Commission staff requested the total state and local per pupil allocation for the last three (3) school years. Additionally, the district provided the total state and local revenue amounts for the last three (3) school years.

Table 3. Total Per Pupil Allocation⁸

	State and Local Revenue Per Pupil Average	Total State and Local Revenue
SY 22-23	\$8,596	\$109,224,838
SY 21-22	\$8,387	\$106,024,257
SY 20-21	\$8,459	\$104,384,694

ANALYSIS

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

First and foremost, there is a lack of evidence within the record that the Maury County Board of Education calculated and deliberated on the substantial negative fiscal impact that the opening of the school would cause the district. The district’s argument states that the sponsor’s application includes an estimate of \$3.21 Million that the school’s student enrollment will generate, and the district will transfer this amount to the school in accordance with

⁷ Maury County, Tennessee Annual Financial Report for 2022, p. 159; 2021, pg. 168; 2020 p. 164

⁸ All data provided by Maury County Public Schools in response to the Commission’s September 22, 2023 request for information.

statute and State Board of Education charter school allocation rules. There is no further documentation submitted by the district to substantiate the claim that the transferring of this amount would result in a grave financial harm to the district. The statement that the school will be funded in accordance with statute and State Board Rule does not equate to meeting the bar of substantial negative fiscal impact.

Additionally, the district states that since the applicant has not identified a targeted community for the school, it is difficult for the district to determine any savings that could be garnered by not serving the children who enroll in ACAM. MCPS states they would assume no savings in the form of school closures, teacher layoffs, or reduction in costs of services such as cafeteria, special education, English Learners, etc. However, there is clear evidence that the district has generally experienced annual enrollment growth (Table 1), and the superintendent testified to this growth within the public hearing. While annual growth in state and local revenue amounts per pupil have been minimal over time (Table 3), the overall total pupil revenue allocation has increased annually.⁹ Additionally, the district did not provide allocations for the 2023-24 school year which would likely reflect the state's additional revenue investments under the implementation of TISA. Further, while the district states that the fiscal impact would increase substantially from Year 1 to 5, I would argue that the primary impact the district would only be in Year 1, since the projected enrollment growth per ACAM is approximately 50 students per year, which falls within the district's regular enrollment fluctuations.

While the revenue totals provided by the district demonstrate increases in state and local revenue amounts (Table 3), the district's argument rests on ACAM being costly to the district because the district has had a deficit budget for the last five (5) years. Despite the budget projecting deficit spending, budgets are only financial models or estimation built on a district's best assumptions at the time of adoption. Despite the projected deficits within the district's annual budget, the district's actual financial position continued to increase over the past three (3) years, as evidenced by annual audits (Table 2) reinforcing the district's ability to absorb the fiscal impact of ACAM. This signals the district's ability to remain fiscally solvent in light of enrollment fluctuations and the likelihood of continued financial health and a strong financial position for the district.

A district does not meet the threshold of demonstrating substantial negative fiscal impact by simply making an argument that based on the amounts calculated within a charter application fiscal impact exists. Since the burden falls on the district and not the applicant to determine substantial negative fiscal impact, any district should conduct a thorough analysis of the potential financial impact that opening a charter would have the overall financial wellbeing of the district. Based on this analysis, the district should present an argument as to the projected cost to the district and why it would cause substantial harm to the district. In the case of MCPS, the district did not submit evidence that any internal analysis was performed to understand or identify the actual fiscal impact of opening ACAM. Furthermore, a district cannot just simply reference the charter school's application and budgeted totals and point to that as the substantial negative fiscal impact.

Finally, based on the documents and record provided by MCPS, it is unclear whether the board's decision to deny ACAM included substantial negative fiscal impact, as referenced within the resolution. The board did not discuss substantial negative fiscal impact in its deliberations on the application, and the resolution did not include specific amounts or district analysis of the impact. I do agree with the district's statement that since the location of ACAM is unknown, and it is difficult to identify the specific schools or regions that would be impacted by the school's enrollment. However, MCPS's argument and understanding of fiscal impact falls short of sufficient.

⁹ Id.

In totality, there is a lack of evidence provided by MCPS to meet the burden of proving that the approval of ACAM 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 ACAM, the data demonstrates that, while the initial opening of ACAM may cause initial enrollment fluctuations greater than those previously experienced by the district, district enrollment is growing annually, and the district's financial position continues to improve.

Based on these findings of fact and analysis, I find that the evidence provided by MCPS does not meet the burden of proving that the approval of ACAM 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, school district or community.

District Denial of Initial Application

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

Name	Title
Lisa Ventura	Superintendent
Eric Perryman	Assistant Superintendent of Operations
Keith Stacey	Assistant superintendent of Instruction
Katrina Davis	Director of Federal Programs & ELL
Lesli Crawford	Director of Special Populations
Jeff Richey	Director of Pupil Services & 504
Michael Ford	Administrator at Elementary Level
Renata Powell	Administrator at Elementary Level
Angela Poag	Administrator at Middle School Level
Eric Hughes	Administrator at High School Level
Kristin Parker	Community Member
Wayne Lindsey	MCPS School Board Member

The ACAM initial application received the following ratings from the MCPS 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 MCPS review committee completed its review and scoring of the initial application, its recommendation was presented to the MCPS Board of Education on April 25, 2023. Based on the review committee's recommendation, the MCPS Board of Education voted to deny the initial application of ACAM.

District's Second Denial of Application

After the denial of the initial ACAM application, the then MCPS Board Chair and the sponsor agreed that, in lieu of submitting an amended application, the sponsor would respond to questions received by the Maury County School Board related to each member's reason for denial. The review committee that was assembled by MCPS to review and score the ACAM initial application was not a part of reviewing ACAM's responses to the board members' questions.



After the MCPS board completed their review of ACAM's written responses, the MCPS Board of Education met on July 18, 2023 to take action on the application. At this board meeting, the Board of Education voted 5-4 in support of the application of ACAM. However, since there was not six votes or board majority in the affirmative, the vote was insufficient, and the motion to approve was not binding. The board reconvened on July 27, 2023 to consider the ACAM new start application paired with the sponsor's responses. At this board meeting, the MCPS Board of Education voted 6-5 to deny the initial application a second time.

Commission Review Committee's Evaluation of the Application

Following the denial of the ACAM 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 ACAM 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 ACAM application, a capacity interview with the sponsor, and a final evaluation and scoring of the application resulting in a consensus rating for each major section. The review committee's consensus rating of the ACAM application was as follows:

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

The review committee recommends denial of the application for American Classical Academy Maury because while the Financial Plan and Capacity met the standard, the applicant failed to provide sufficient evidence in the academic and operational sections to demonstrate the application meets the required criteria of the rubric.

The applicant's Academic Plan and Capacity partially meets standard because of the lack of identified community with Maury County for the proposed school and gaps within the academic plan around assessments, services to special populations, and school culture. The application did not clearly identify and describe a community in which the school intends to locate within Maury County. Without sufficient detail related to the proposed geographic region, the committee could not determine whether there was sufficient community support to meet enrollment projections or if the proposed academic model would meet the needs of students within this community. Additionally, the applicant's lack of an identified school leader led to significant gaps in the implementation of key aspects of the academic model. The structure of American Classical Education network schools' places significant autonomy and authority related to the academic plan to the school leader, and without an identified school leader, the review committee found that the application lacked the specificity necessary to meet the standards of the rubric.

The applicant's operations plan partially meets standard because of insufficient progress with its facility plan due to the lack of an identified community. Since the operator has not identified an area of Maury County to locate

in, there is a lack of evidence that the proposed facility plan is reasonable and feasible. Additionally, the applicant's operational model and structure are heavily reliant on the head of school. The school leader is responsible for startup, student recruitment, staffing, professional development, and ongoing operations at the school, and the network staff does not provide direct school supports. The ultimate ability to open the school successfully hinges on the identification and hiring a strong leader with the sufficient knowledge and expertise necessary to not only drive academic success but also ensure operational and financial success. Without a head of school identified, a location, facility, or geographic region, the timelines for start-up activities are significantly off track from the timelines outlined in the application. Moreover, the sponsor did not provide a plan for ensuring time sensitive items were addressed and who would be responsible in the interim.

In contrast, the financial plan was comprehensive and included reasonable assumptions that supported the start-up expenses. This is a result of the sponsor drawing from historical financial data from other operational Barney Charter School Initiative (BCSI) schools and actual quotes from service providers. The operating budget was 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 the 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 not 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 ACAM application, please see **Exhibit A** for the complete Review Committee Recommendation Report, which is fully incorporated herein by reference.

Public Hearing

Pursuant to statute¹⁰ and Commission Policy 2.000, a public hearing chaired by the Executive Director was held on September 21, 2023. MCPS's opening presentation began with the superintendent sharing the process the district and its review committee took upon receiving the initial application with the presentation concluding with members of the board speaking to the remainder of the new start application process. Per the MCPS superintendent, upon receipt of the initial application, the MCPS School Board approved a charter school application procedure and charter application review team. The superintendent indicated that each member of the review committee reviewed the application in its entirety, the committee then held a capacity interview with the applicant group, and the committee process culminated in a finalized and combined rubric and board presentation summarizing the committee's identified strengths and deficiencies. The board voted on April 25, 2023 to deny the initial application of ACAM. At this point, MCPS staff and the review committee were removed from all conversations regarding the application review. The superintendent then handed off the presentation to Wayne Lindsey, a board representative, who also participated on the review committee, to discuss the process that the board took post denial of the initial application. Within his statement, the board member shared that after the denial of the initial application, the board was instructed by the then board chair that the board members who voted to deny the application were to provide via email their concerns and reasons for voting no. According to the two board members present at the hearing, these questions were then passed on directly to ACAM. ACAM responded to the questions and concerns that the board

¹⁰ T.C.A. § 49-13-108

members posed, and upon receipt of the responses, the board took a final vote on the new start application, inclusive of the written responses.

In the sponsor's opening statement, representatives from ACAM 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 their application presents a strong academic plan, including that the application ACAM lays out a content-rich education in liberal arts and science paired with civics. The applicant also cited that a neighboring district, Rutherford County, found that the applicant's proposed academic plan met standards for approval. Further, the applicant cites that the curriculum proposed by ACAM is shown to produce 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 discussed how the governing board includes a board member who resides in Maury County. The applicant continued to describe the robust financial plan outlined within the application, stating that the school is uniquely positioned to weather unprecedented financial storms. The applicant then described how the authorization of ACAM would create more opportunities and choices for parents, which was cited as particularly important in Maury County due to the rapidly growing student population in the geographic region and the district's need to build additional schools. In closing, the sponsor explained the academic program for the school, the core tenets of classical education, and how they will be implemented at ACAM. 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. This is accomplished by focusing on what is true, good, and beautiful, while utilizing primary source documents and Socratic dialogue, consistent with a classical model.

During questioning by the Commission, MCPS discussed the overall enrollment trends, which indicate consistent growth ranging from 1-3% annually across the county. The line of questioning then transitioned to focus on the process taken by the district and board to review both the initial application and responses provided by the applicant. The superintendent confirmed the work taken by the review committee to review the initial application consistent with her opening presentation. While the review committee cited strengths and deficiencies in their presentation to the board, the ultimate reasons for the denial of the initial application were based on the questions and concerns cited by individual board members. When questioned why the applicant did not submit an amended application, MCPS representatives shared that the then board chair decided that having the applicant respond to the board's questions and concerns was the best course of action and then coordinated this adjusted process directly with ACAM representatives. When questioned whether the district representatives were aware of any objections by the sponsor to take this route, they responded that it was their understanding that the district had a mutual agreement with the sponsor to take this alternative approach. Questions then transitioned to focus on the reasons for denial at the July meeting. The MCPS board members shared that the second vote was grounded in the initial application and written responses from ACAM, and individual board members who voted to deny the application the second time found that the sponsor did not adequately address their questions. The board member present stated that the responses that were provided by ACAM did not directly answer the question, and, in some instances, the applicant simply referred to other charter schools such as KIPP Nashville. This ultimately led to members of the board determining that the responses were not sufficient, and the reasons for the denial of initial application a second time were the same as those noted in the board's initial vote in April.

The Commission then questioned the sponsor beginning with a question surrounding the lack of a formal amended application and whether the sponsor expressed concerns with the adjusted process. The general counsel for ACAM affirmed that it was a mutual decision between the then board chair and the sponsor, and they were

comfortable following the board chair's recommendation to respond to questions versus submit a full amended application. Next, ACAM addressed a question related to the network's capacity to open more than one school at a time since it has a school approved in Rutherford County and an active appeal under Jackson-Madison County Schools. The applicant spoke to the fact that they would exercise their right to delay opening until the 2025-26 school year which would allow the network time to identify a facility, recruit staff, and learn lessons from opening in Rutherford County. When questioned about enrollment targets and community outreach given that ACAM has not yet identified a specific community, ACAM shared that they will continue community outreach and is confident that enrollment targets will be met. The applicant, however, provided no further specific detail surrounding geographic location or an identified geographic region beyond that the focus has been Columbia but will ultimately be based on what is available. Additionally, the applicant shared that the school would be financially viable with as few as 150 students.

The public hearing concluded with closing statements by both parties and the receipt of 17 in-person comments, with seven (7) speaking in support of MCPS and ten (10) speaking in support of ACAM. The Commission also accepted written comments, and the Commission received 137 written comments, with 102 writing in support of MCPS and 35 writing in support of ACAM.

ANALYSIS

I first want to stress to all parties the importance of adhering to the statutory charge and application process laid out in statute and State Board rule. When an initial application has been denied by a local board of education, "the sponsor has thirty (30) days to submit an amended application to correct the deficiencies."¹¹ Both the local board of education and the sponsor failed to adhere to the statutory process. While I appreciate that all parties agreed to deviate from the process required by statute, these actions complicated an already complex process. The submission of written responses to the local board of education members' questions rather than a full submission of an amended application unfortunately led to more questions between both parties about the information used by the MCPS Board of Education in their second denial of the application. A clean process, in alignment with statute, ensures that all parties are afforded a comprehensive review and that only quality applications are approved. Local boards, by clearly stating the reasons for denial of an initial application, can communicate to all applicants where they expect improvements in an amended application. Likewise, sponsors can focus their amendment efforts on those noted deficiencies and present an improved application to properly evidence a quality option for the board's consideration. Even after extensive questioning at the public hearing, the application review process conducted by the Maury County Board of Education leaves significant questions, and I strongly encourage the district to review and improve its process moving forward.

In the resolution submitted in this appeal, there was a cited reason for denial of "substantial negative fiscal impact." However, in no communication submitted with this appeal did MCPS speak to this cited reason for denial. In the public hearing, representatives of the local board of education did not speak to substantial negative fiscal impact during their opening, their closing, or in response to the Commission's questions. Substantial negative fiscal impact was only addressed by a member of the public in public comments. T.C.A. § 49-13-108(c) sets forth that substantial negative fiscal impact has a specific consideration in the charter school application process, but overall, there is a lack of evidence that the Maury County Board of Education deliberated on this reason and made an affirmative decision that this was an actual reason to deny the application. Since substantial negative fiscal impact was a part of the resolution submitted by Maury County in the appeal, the Commission analyzed the fiscal impact in alignment with

¹¹ T.C.A. § 49-13-108(b)(3)

the Commission's charge in statute. However, moving forward, I urge local boards of education that cite substantial negative fiscal impact as a reason for denial to have a robust discussion by the board with clear information supporting this reasoning, so it is clear to all parties involved the basis for this reason.

While there were several significant gaps identified within the record regarding the overall application review process, my recommendation reflects a full review of the record as compiled through the local board's process and the rules related to new start appeals. 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 and¹²," whether "approval of the application is in the best interests of the students, LEA, or community¹³." 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 MCPS, 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 ACAM application did not rise to the level of meeting or exceeding the standards required for approval.

I agree with the review committee that the sponsor's Academic Plan and Capacity partially meets standard. While the mission and vision of the school is clear to bring a classical education model to Maury County, the academic plan includes enrollment projections that are not supported by evidence that the numbers would materialize. The sponsor has yet to identify a community from which they would be able to recruit students. Even when questioned in the public hearing, there was insufficient information provided by the sponsor regarding where in Maury County it intends to locate the school. With a district the geographic size of Maury County, with a variety of population centers and demographics, it is difficult to determine if the proposed academic plan would be successful without an identified community for the school. Moreover, it is impossible to assess the community demand for an academic plan and model when no community has been identified. While a specific location is not required in the application, an applicant is to clearly describe within the application the community from which the school intends to draw students, including demographics and school zones. Identifying a proposed area will greatly inform outreach, recruitment, and enrollment plans. Since filing a letter of intent in December 2022, the sponsor has had time to identify a community within Maury County where it plans to locate. Without a targeted community, there is little verifiable evidence of community need/demand, parent interest, facility planning and timeline, and demographic projections. I do not discount the public comments that we received during this appeal in support of a public charter school option within Maury County as well as a classical option. However, to meet the standards for approval, an application needs to be tailored to the community that it plans to serve such that it can demonstrate that it is a quality model for that specific community. There is currently a lack of evidence within the record that American Classical Academy Maury has met this standard.

A second weakness within the record is the lack of an identified school leader for American Classical Maury. While the identification of a school leader is not required as a part of the application process, the challenge in this

¹² T.C.A. § 49-13-108(5)(D)

¹³ *Id.*

appeal is that much of the academic, operational, and financial decision-making within the American Classical Education model rests with the school leader. This was verified through a series of questions in the capacity interview. Within the proposed model, the school leader is responsible for ensuring curriculum alignment to state academic standards, deciding on the suite of assessments for students, the implementation of services to special populations, implementing student discipline and culture, hiring staff, coordinating professional development, working through legal issues, and managing the budget and financial decisions of the school. The representatives from the network confirmed that the network staff is there to support the board rather than directly support the school. Given this setup, I have significant remaining questions about the proposed model and the ability to implement the model since so much hinges on the right school leader who can take on all of these responsibilities.

I acknowledge that the sponsor has indicated that if approved, they would exercise the statutory right to delay opening for one (1) year.¹⁴ However, the Commission's charge is a de novo, on the record review of the amended application, and the Commission cannot approve an application on the contingency of a one (1)-year delay. The question before the Commission is whether this presented application is ripe for approval. As submitted, the application intends a 2024-2025 school year opening. Approval of an application based on an indicated exception is akin to approving the application with contingencies. That is beyond the Commission's charge, and therefore, I cannot support a recommendation for approval.

I do agree with the review committee that the sponsor's financial plan and capacity meets standard for approval. The sponsor's budget is sound and reflects support sufficient to sustain an opening and the plan for scaling the school. The access to funds from the American Classical Education Foundation, whether through a no-interest loan or revolving line of credit, supports my confidence that financially the school would be prepared for a successful opening. I acknowledge the sponsor's work to ensure the budget is reasonable and contains assumptions that are reasonable and supported by established service providers such that I am confident in the finding that the financial plan meets standard.

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. Overall, the sponsor has several significant gaps within its proposed plan that it must address before it is ready for approval. While I appreciate the passion of the sponsor for their model and the members of the community who want a public choice option, the application for American Classical Maury did not meet the standards for approval at this time. For the reasons expounded on in this report, I recommend that the Commission deny the American Classical Academy Maury application.

¹⁴ T.C.A. § 49-13-110(b) permits a public charter school to delay initial opening "...for a period not to exceed one (1) academic year."

CONCLUSION

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



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 Maury

Sponsor: American Classical Education

Proposed Location of School: Maury County Public Schools

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 and members of the governing board, 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 Maury

Sponsor: American Classical Education

Proposed Location of School: Maury County Public Schools

Mission:¹ The mission of American Classical Academy Maury (ACAM) 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 Maury County, Tennessee and serve students in kindergarten through 12th grade when fully built out. The school, American Classical Academy Maury (ACAM), is a new-start school and would be the second school for the sponsor. The school intends to operate in Maury County to add “another high-performing educational model” and “meet the needs of students who are not doing well in the traditional setting.”³

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

¹ Initial Application, pg. 11

² Ibid, pg. 33

³ Ibid, pg. 26

⁴ Ibid, pg. 119



Classical Academy Maury has budgeted \$250,000 from the Charter Schools Program Grant and projects \$349,610 in expenses for the school. American Classical Academy Maury projects the school will have \$4,047,505 in revenue and \$3,993,055 in expenses in Year 1, resulting in a balance of \$154,839. By Year 5, the school projects to have \$5,832,921 in revenue and \$5,676,444 in expenses, resulting in a positive ending fund balance of \$1,077,261.⁵ The school anticipates that 27% of the student population will qualify as economically disadvantaged, 14% of the student population will be students with disabilities, and 6% of the student population will be English Learners.⁶

⁵ Budget Summary

⁶ Amended Application, pg. 33

Summary of the Evaluation

The review committee recommends denial of the application for American Classical Academy Maury because, while the financial plan and capacity met the standard, the applicant failed to provide sufficient evidence in the academic and operational sections to demonstrate the application meets the required criteria of the rubric.

The applicant's Academic Plan and Capacity partially meets standard because of the lack of identified community within Maury County for the proposed school and gaps within the academic plan around assessments, services to special populations, and school culture. The application did not clearly identify and describe a community in which the school intends to locate within Maury County. Without sufficient detail related to the proposed geographic region, the committee could not determine whether there was sufficient community support to meet enrollment projections or if the proposed academic model would meet the needs of students within this community. Additionally, the applicant's lack of an identified school leader led to significant gaps in the implementation of key aspects of the academic model. The structure of American Classical Education network schools places significant autonomy and authority related to the academic plan on the school leader, and without an identified school leader, the review committee found that the application lacked the specificity necessary to meet the standards of the rubric.

The applicant's operations plan partially meets standard because of insufficient progress with its facility plan due to the lack of an identified community. Since the operator has not identified an area of Maury County to locate in, there is a lack of evidence that the proposed facility plan is reasonable and feasible. Additionally, the applicant's operational model and structure are heavily reliant on the head of school. The school leader is responsible for startup, student recruitment, staffing, professional development, and ongoing operations at the school, and the network staff does not provide direct school supports. The ultimate ability to open the school successfully hinges on the identification and hiring of a strong leader with the sufficient knowledge and expertise necessary to not only drive academic success but also ensure operational and financial success. Without a head of school identified, a location, facility, or geographic region, the timelines for start-up activities are significantly off track from the timelines outlined in the application. Moreover, the sponsor did not provide a plan for ensuring time sensitive items were addressed and who would be responsible in the interim.

In contrast, the financial plan was comprehensive and included reasonable assumptions that supported the start-up expenses. This is a result of the sponsor drawing from historical financial data from other operational Barney Charter School Initiative (BCSI) schools and actual quotes from service providers. The operating budget was 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 the 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:

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



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

Analysis of the Academic Plan Design and Capacity

Rating: Partially Meets Standard

Weaknesses Identified by the Committee

The applicant's Academic Plan Design and Capacity partially meets standard because while the application contains a clear mission and vision for a classical education school, gaps remain within the academic plan around assessments, services to special populations, and school culture. Additionally, the application lacked a clear description of the community in which the school intends to locate causing additional concerns related to meeting enrollment targets, the proposed student demographics, and community engagement.

The structure of the American Classical Education network places a significant amount of decision-making authority regarding key areas of the academic model on the leader of the school. While having a leader in place is not a requirement at the time of application, without a designated leader to make key instructional decisions regarding the model, the result is an academic plan that lacks the level of specificity that is required to meet standards of the rubric.

Overall, there is a lack of sufficient detail and identified expertise related to how the school plans to identify and serve learners with special needs within the classical education model without an identified school leader with direct experience and capacity in this area. The model relies on the expertise of the school leader and school leadership team to implement all services related to special populations including students with disabilities and English Learners. Without an identified school leader to provide additional detail in the capacity interview, beyond the plan outlined in the application, the academic plan does not meet the standard for approval. For instance, the application lacks specific information on the processes and oversight for students from special populations. RTI² and MTSS are identified in the application as a structure to support students needing intervention, but the information is vague and does not indicate how and when students will be identified or monitoring processes. Overall, there was a lack of critical expertise, experience, and additional information provided within the capacity interview to satisfy the review committee's questions around gaps in implementation.

While the application clearly sets out high expectations for student character and virtues, the application does not contain specific systems for discipline or addresses how consistency in implementation of the plan will be achieved school wide without an identified school leader with direct experience and capacity in this area. Within the model, the school leader is responsible for developing and implementing the school culture and school discipline process. While the application explains that discipline support for students will come in the form of strong academic classrooms where students will feel valued, there is no mention of a specific system for discipline – such as PBIS, restorative practices, etc. – nor is there any specific mention of RTI-Behavior supports for students. Given that the school's discipline plan and culture are the responsibility of the school leader, without an identified school leader to fill critical gaps and address questions in implementation, the plan does not meet the standard for approval.

Another weakness that the review committee noted in the application is the assessment and data analysis plan, and how data will be collected and utilized within the school. Under the model, the school leader is responsible for identifying the assessments the school will use and overseeing the use of student data. Within the application, there is limited detail related to how data collection and analysis will inform instruction. Additionally, the application does not clearly articulate the process by which teachers will use collected data to drive instruction and by which administrators will use data for decision making. The application provides an extensive list of assessments. However, it remains unclear which specific assessments will ultimately be used and how they will work together cohesively to monitor student proficiency and growth. Moreover, in the capacity interview, network staff indicated that the list of



assessments were options, and the school leader will be responsible for selecting the final assessments. Since a school leader has not yet been identified, it is unclear when final assessments will be selected, if those assessments are aligned to standards, and how the assessments will be scheduled to ensure that teachers and staff have the information they need to evaluate and monitor instructional effectiveness and student performance.

Finally, the application did not clearly describe a community from which the school intends to draw students and as such lacked sufficient detail related to the specific demographics, school zones, and academic performance for specific schools. Based on the geographic size of the Maury County with multiple more populated areas and more rural areas, there was a lack of evidence within the application that the proposed model would meet the needs of students in a community and that the school could meet its enrollment projections without a targeted community.

Strengths Identified by the Committee

While the Academic Plan Design and Capacity partially meets the standard because of the weaknesses described above, the review committee did find that the applicant provided a clear plan for aligning its curriculum to Tennessee Academic Standards and the use of differentiated ability groupings for differentiated instruction within the class schedule. The model places a large focus on early literacy development and the schedule devotes significant class time to building this foundation. Additionally, the mission and vision of the school are strongly aligned to the model and proposed curriculum. Teachers will receive robust professional development through the partnership with the BCSI which has supported dozens of charter schools with similar models across the country.

Analysis of the Operations Plan and Capacity

Rating: Partially Meets Standard

Weaknesses Identified by the Committee

The applicant's Operations Plan and Capacity partially meets standard because the applicant has not demonstrated sufficient progress with its facility plan as evidenced by not yet identifying a specific geographic region to locate within Maury County. Additionally, the operational plans and leadership structure are heavily dependent on the head of school's expertise and ability to execute the plan. Without this individual identified or a clear plan to identify a school leader, the committee could not assess the likelihood of operational success.

The facility plan outlined within the application was found to be jeopardized by the fact that the network has not yet identified a specific geographic region in Maury County in which they propose to locate. While in the capacity interview, the applicant spoke to targeting the general area of Columbia and that they have identified a few properties, the lack of specific details compromised the timeline presented within the application. Additionally, the lack of identified geographic region brought into question whether the facility plans were sufficient to serve the anticipated student population, given that student demographics can vary greatly depending on where the school locates within the county. Lastly, without any specific details related to the facility plans, the review committee was unable to determine whether the plan for financing and renovating the facility aligned with the financial projections. Apart from delaying the school's opening, the applicant provided no further contingency plans sufficient to meet the standard for approval.

Within the application and capacity interview, ACAM presented an operational model and structure that places significant importance and autonomy on the leader selected to be Head of School. The school leader for ACAM would not only be responsible for the academic performance and implementation of the classical model of education, but they would also be required to possess a level of skill necessary to execute operational functions including, but not limited to, budget management, procurement, legal, and human resources. While an identified school leader is not a requirement for approval, the operational success of the described school model hinges on the right school leader who possesses the requisite expertise, experience, and knowledge to execute the plan. The identification and hiring of this individual are critical in the overall success of the school, and there is a lack of evidence that the school's operations can be successful without evaluating the capacity of this individual. Moreover, while the start-up plan was detailed and robust, the sponsor did not provide a plan for ensuring time sensitive items were addressed and who would be responsible in the interim for ensuring start-up activities remained on track prior to the hiring of a school leader.

Furthermore, while a small network team is identified and possess various skills and experience in academic and operational functions, the application explicitly states that the network does not support the schools and their operations. During the capacity interview, the review committee sought clarification on this statement, and the applicant group confirmed that the majority of decisions are made at the school level, while the role of the board is fidelity to the model, compliance to laws, and performance. With school leaders reporting directly to the board, the network staff is intentionally lean and not involved in the day-to-day operations of the school site. The school leader is responsible for most, if not all, decisions impacting the school including academic, operational, and financial success. With the network model placing significant levels of autonomy at the school level, the lack of an identified leader to bolster the operations plan outlined within the application was found to compromise the operational plan and the review committee's confidence that the school could open in line with the timelines and academic plan outlined within the application.

Strengths Identified by the Committee

Although the applicant only partially met standards for Operations Plan and Capacity, the applicant's plan to partner with Bouma USA, a company with a successful track record of supporting charter schools in the construction and renovation of school facilities was deemed a strength. The application also outlines a thorough start-up plan and rigorous professional development plans which will be implemented upon the hire of a school leader. Upon identifying and hiring a school leader, the professional development plan outlined within the application, which includes summer BCSI trainings coupled with in-house training is likely to support the educational program and student population. Additionally, the proposed board is composed of a group of proven local leaders with diverse backgrounds and experience.

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 ACAM 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's long-term success and financial solvency. Access to these funds demonstrated 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. The review committee did have remaining questions surrounding the plan for financing and renovating the facility in alignment with the financial projections, given the lack of identified facility; however, having access to sufficient contingency funds alleviated these concerns enough for the financial plan and capacity to overall meet standards.



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.