



## **Executive Director's Recommendation**

### **Cornerstone Prep Lester Campus 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 Cornerstone Prep Lester Campus ("sponsor") appealed the denial of its amended application by the Memphis-Shelby County Schools ("MSCS") Board of Education to the Commission.

Based on the procedural history, findings of fact, analysis, and Review Committee Report, attached hereto, I believe that the decision to deny the Cornerstone Prep Lester Campus amended application was contrary to the best interests of the students, the LEA, or the community.<sup>1</sup> Therefore, I recommend that the Commission overturn the decision of MSCS Board of Education to deny the amended application for Cornerstone Prep Lester Campus.

### **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 Cornerstone Prep Lester Campus'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."<sup>2</sup> In addition, the Commission is required to hold a public hearing in the district where the proposed charter school seeks to locate.<sup>3</sup>

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.<sup>4</sup> 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. In 2012, the Tennessee Department of Education assigned Cornerstone Prep Lester Campus, previously operated by Memphis-Shelby County Schools, to the Achievement School District because of its designation as a priority school in the bottom 5% of academic achievement of public schools in Tennessee.
2. Since school year 2012-2013, Capstone Education Group (CEG), the charter management organization, has operated Cornerstone Prep Lester Campus within the Achievement School District.
3. Pursuant to T.C.A. § 49-1-614(k)(3), on November 30, 2022, the sponsor submitted a letter of intent to MSCS expressing its intention to file a charter school application.

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<sup>1</sup> T.C.A. § 49-13-108

<sup>2</sup> Tennessee Charter School Application Evaluation Rubric – Ratings and Scoring Criteria

<sup>3</sup> T.C.A. § 49-13-108

<sup>4</sup> *Id.*

4. The sponsor submitted its initial application for Cornerstone Prep Lester Campus to MSCS on January 31, 2023.
5. MSCS assembled a review committee to review and score the Cornerstone Prep Lester Campus initial application.
6. On March 7, 2023, MSCS's review committee conducted a capacity interview with representatives of Cornerstone Prep Lester Campus.
7. The MSCS review committee reviewed and scored the Cornerstone Prep Lester Campus initial application and recommended to the MSCS Board of Education that the initial application be denied, indicating it did not meet standard in Portfolio Review and Performance Record and it partially met standard in Academic Plan Design and Capacity, Operations Plan and Capacity, and Financial Plan and Capacity.
8. On April 25, 2023, the MSCS Board of Education voted to deny the Cornerstone Prep Lester Campus initial application based on the review committee's recommendation.
9. The sponsor amended and resubmitted its application for Cornerstone Prep Lester Campus to MSCS on May 26, 2023.
10. The MSCS review committee reviewed and scored the Cornerstone Prep Lester Campus amended application based on the charter application scoring rubric.
11. The MSCS review committee rated each section of the Cornerstone Prep Lester Campus amended application as meets the standard in Academic Plan Design and Capacity, Operations Plan and Capacity, and Financial Plan and Capacity, and does not meet the standard in Portfolio Review and Performance Record and recommended denial to the local board of education.
12. On July 18, 2023, the MSCS Board of Education voted to deny the amended application of Cornerstone Prep Lester Campus.
13. The sponsor appealed the denial of the Cornerstone Prep Lester Campus amended application in writing to the Commission on July 28, 2023, including submission of all required documents per Commission Policy 2.000.
14. The Commission's review committee independently analyzed and scored the Cornerstone Prep Lester Campus amended application using the Tennessee Department of Education's charter school application scoring rubric.
15. On August 29, 2023, the Commission staff held a public hearing at the Memphis Teaching and Learning Academy Auditorium in Memphis, Tennessee. At the public hearing, the Executive Director, sitting as the Commission's Designee, heard presentations from the sponsor and MSCS and took public comment regarding the Cornerstone Prep Lester Campus amended application.
16. The Commission's review committee conducted a capacity interview with key members of the Cornerstone Prep Lester Campus leadership team on September 6, 2023, via Microsoft Teams.
17. After the capacity interview, the Commission's review committee determined a final consensus rating of the Cornerstone Prep Lester Campus amended application, which served as the basis for the Review Committee Recommendation Report, attached hereto as **Exhibit A**.

18. The Commission staff conducted a full review of the record which includes the initial and amended applications submitted by the sponsor, documentation submitted by MSCS, and the findings of the public hearing and public comment. The Commission’s General Counsel conducted a full review and legal analysis of the record.

**FINDINGS OF FACT**

**District Denial of Initial Application**

The review committee assembled by MSCS to review and score the Cornerstone Prep Lester Campus initial application consisted of the following individuals:

<b>Name</b>	<b>Title</b>
Kimberly Adams	MSCS Finance & Accounting
Jessica Benson	MSCS Office of Charter Schools (Lead Reviewer)
Eugene Bradford	MSCS Nutrition Services
Erin Conley	Expert External Reviewer
Rosalind Davis	MSCS Attendance & Discipline
LaKira Elliott	MSCS Safety & Security
Jose Flores Vazquez	MSCS Office of General Counsel
Angela Hodges	MSCS Community Outreach & Parental Engagement
Brian Ingram	MSCS Human Resources
Sean Isham	MSCS Facilities Planning
Kongsouly Jones	MSCS Office of Assistant Superintendent of Schools
Eugene Lockhart*	MSCS School Operations
Edraynce Monroe	Parent/Community Reviewer
Melanie Rackley	Expert External Reviewer
Dedriene Rogers	MSCS Exceptional Children
Thomas Rogers*	MSCS I-Zone & Priority Schools
DeAnna Tatum-Cross	MSCS English Language Learners
LaKeva Thompson	MSCS Curriculum & Instruction
Bill White*	MSCS Research Planning & Improvement
Sonja Wright	MSCS Professional Learning & Support

*\*Did not submit feedback in the amended application round*

The Cornerstone Prep Lester Campus initial application received the following ratings from the MSCS review committee:

<b>Sections</b>	<b>Ratings</b>
Academic Plan Design and Capacity	Partially Meets Standard
Operations Plan and Capacity	Partially Meets Standard
Financial Plan and Capacity	Partially Meets Standard
Portfolio Review and Performance Record	Does Not Meet Standard

After the MSCS review committee completed its review and scoring of the initial application, its recommendation was presented to the MSCS Board of Education on April 25, 2023. Based on the review committee’s



recommendation, the MSCS Board of Education voted to deny the initial application of Cornerstone Prep Lester Campus.

**District Denial of Amended Application**

The review committee assembled by MSCS to review and score the Cornerstone Prep Lester Campus amended application mirrored that of the committee that reviewed the initial application. Upon resubmission, the MSCS review committee conducted a review of the amended application, and the amended application received the following ratings from the MSCS review committee:

Sections	Ratings
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
Portfolio Review and Performance Record	Does Not Meet Standard

After the MSCS review committee completed its review and scoring of the amended application, its recommendation was presented to the MSCS Board of Education on July 18, 2023. At the July 18, 2023 board meeting, the MSCS Board of Education voted to deny the amended application of Cornerstone Prep Lester Campus.

**Commission Review Committee’s Evaluation of the Application**

Following the denial of the Cornerstone Prep Lester Campus 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 Cornerstone Prep Lester Campus amended application. This review committee consisted of the following individuals:

Name	Title
Drejean Cummings	Commission Staff
Gus Gluek	External Reviewer
Rebecca Ledebuhr	Commission Staff
Whitney O’Connell	External Reviewer
Gomer Pasqual	Commission Staff
Hillary P. Sims	External Reviewer

The review committee conducted an initial review and scoring of the Cornerstone Prep Lester Campus 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 Cornerstone Prep Lester Campus 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
Portfolio Review and Performance Record	Meets or Exceeds Standard

The review committee recommends the approval of the amended application for Cornerstone Prep Lester (CPL) due to the school's strong performance in key areas, a commitment to high-quality instructional materials,



robust community engagement, strong financial management, and a demonstration of their readiness to provide quality education.

CPL's Academic Plan Design and Capacity meets or exceeds the standard due to the operator's commitment to using high-quality instructional materials, a strong assessment and data analysis plan, a clear process for serving students with disabilities, and a well-structured recruitment and enrollment plan. During the capacity interview, the committee learned how the school adapted to meet student needs, particularly in closing achievement gaps through data analysis. Curriculum adjustments, including the adoption of CKLA (Reading360), are aligned with research on reading science. The applicant demonstrated a comprehensive approach to identifying special populations, convening a child study team with various professionals. In addition, the applicant's recruitment and enrollment strategies reflect intentionality and include transparent communication with parents.

The applicant's Operations Plan and Capacity demonstrates compliance with standards due to their facility plan, governance structure, and strategic approach to professional development and teacher preparation. They exhibited adaptability in explaining operational improvements and outlined contingency plans for potential facility transitions. The applicant's professional development plan was exemplary, with a shift to proactive strategies based on student data, comprehensive teacher training, and a strong partnership with Uncommon Schools. The board members bring diverse expertise, and the collaboration processes—including clear feedback channels and regular meetings—are well-defined.

The applicant's Financial Plan and Capacity meets or exceeds the standard due to their strong financial expertise as a network and board, a solid financial position, flexible resource allocation, diverse funding sources, transparent budgeting, and adherence to best financial practices. Their proposed budget aligns with programmatic details and staffing descriptions, reflecting sound financial policies and procedures. The network also highlighted a substantial reserve fund and various funding sources, including board member support and the Charter School Growth Fund. CPL's financial strategy includes flexibility in allocating funds, potential options for facility-related expenses, and a well-structured five-year budget with contingency plans for revenue shortfalls. They outsource payroll and engage an accounting firm, emphasizing their commitment to fiscal prudence. Additionally, their track record with other schools demonstrates consistent adherence to sound fiscal practices.

Lastly, the Performance Record section demonstrates CPL's commitment to serving all students and employing data-driven methods to foster a success-oriented environment. Although CPL has not achieved priority exit status within its charter term, there is clear evidence of the network effectively addressing achievement gaps through data analysis. The operator's growth and evolution while operating schools in Memphis are evident, and the operator has produced promising results in reading and mathematics. The network and school team provided candid and data-driven responses, acknowledging challenges, and highlighting successful adjustments. The network stated that they aim to maintain a consistent growth rate, achieve TVAAS standards, and meet Annual Measurable Objectives (AMO) targets across all subjects. The network and school team's commitment to data-driven decision-making is evident, with tailored learning labs, systematic data assessments, and a clear understanding of data's role in addressing student needs and achievement gaps.

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 Cornerstone Prep Lester Campus amended application, please see **Exhibit A** for the complete Review Committee Recommendation Report, which is fully incorporated herein by reference.

## Public Hearing

Pursuant to statute<sup>5</sup> and Commission Policy 2.000, a public hearing chaired by the Executive Director was held on August 29, 2023. MSCS's presentation at the public hearing focused on the denial of CPL's amended application due to concerns regarding the school's past performance over their ten-year charter term. MSCS discussed the district's process for evaluating the application, noting that they assembled a review committee which consisted of community members, experts, and local charter leaders. The review committee then used the rubric to determine the rating for the applicant and found that the academic, operations, and finance sections of the amended application met the standard but found that the portfolio review and past performance did not meet the standard. Representatives from MSCS indicated that CPL's amended application was denied based on the applicant's portfolio review and past performance, namely, the fact that the school has been designated as a priority school since CEG took over the school's operations. MSCS explained that CPL's data has decreased over time, the school remains on the priority school list, and the school is the lowest performing in the CEG network.

In the sponsor's opening statement, they emphasized the organization's mission to serve the families of Memphis, particularly in struggling neighborhoods. The sponsor highlighted the high mobility rate in the community around Cornerstone Prep Lester and how it has impacted their academic proficiency and TNReady scores. The sponsor presented data showcasing the organization's achievements, including approvals to open new schools and high performance compared to other ASD schools. They also emphasized the availability of support services, such as nurses, counselors, special education teachers, and teacher coaches, which larger districts might not provide. The sponsor pointed out the success of CEG schools, including high on-track and mastery rates in math and science, as well as high parent satisfaction. The sponsor mentioned improvements made post-pandemic and impressive growth rates in math and other subjects, despite challenges posed by student mobility.

During the Commission's questioning, MSCS clarified the review team's composition, which includes expert and external charter reviewers, along with content leads with specialized knowledge. They shared that the team undergoes training and receives support throughout the process, gathering questions during the capacity interview, and then generating a consensus rubric. They then provided more detail on the application and key areas of concern for the review committee. The district shared that if CPL were to transition to MSCS from the ASD, the plan would be to keep the school open within the I-Zone support structure, offering additional supplies, instructional hours, and professional development for faculty. The district clarified that if CEG were to be approved for a new charter term and desire to stay in the current building, the operator would need to work with the facilities planning and real estate management team, undergo appraisals, and potentially a saturation analysis, for a recommendation to be made to the board.

During the Commission's questioning of the sponsor, they emphasized the quality of seats offered by the school, highlighting strong growth data exceeding national norms especially for students starting from lower academic levels. They also referenced their network schools and noted that they are showing great growth and mastery. Addressing the 10-year priority list status, CEG shared that a 14.5% growth rate was just shy of achieving priority exit status for Cornerstone Prep Lester. CEG also mentioned the network's experience in managing previous transitions of schools from the ASD to the Commission, which directly impacts enrollment, and the network noted that enrollment numbers remained stable at the two schools that transitioned. Finally, the sponsor expressed their intention to work with MSCS to address the facility transition quickly, indicating a willingness to send a Letter of Intent to the district. They stressed the importance of stability for teachers, staff, and students to remain in the building.

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<sup>5</sup> T.C.A. § 49-13-108

While they noted their desire to continue in their current location, the sponsor spoke to warehouse space availability nearby and longer-term facility options as contingency plans.

The public hearing concluded with closing statements by both parties and the receipt of eight in-person comments, with none speaking in support of MSCS and eight speaking in support of Cornerstone Prep Lester Campus. The Commission also accepted written comments, and the Commission received 16 written comments, with none writing in support of MSCS and 16 writing in support of Cornerstone Prep Lester Campus.

### **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 and<sup>6</sup>,” and whether “approval of the application is in the best interests of the students, LEA, or community<sup>7</sup>.” 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 MSCS, 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 Cornerstone Prep Lester Campus amended application did rise to the level of meeting or exceeding the standards required for approval. It is through the work of the review committee, who conducted a review of the amended application and a capacity interview with the sponsor, that I agree with the recommendation to approve the application. The sponsor, within the capacity interview, was able to provide significant detail, data, and demonstrations of capacity to bolster the amended application. Without this strong capacity interview and the information contained within it, my recommendation on the amended application alone may have been different.

Before I detail my reasons for my recommendation to approve the amended application for Cornerstone Prep Lester Campus, I want to clarify the basis of my recommendation and ultimately the Commission’s decision. My recommendation is not based on the question of whether Cornerstone Prep Lester should continue to exist and operate. My recommendation is based on the question of whether Capstone Education Group, as a charter management organization, should remain as the operator of Cornerstone Prep Lester Campus for a new, ten (10)-year charter term under a new authorizer. I am confident in MSCS’s statement in the public hearing that, if the school is returned to MSCS, Cornerstone Prep Lester will remain open and in operation under the I-Zone. Therefore, the focus of my recommendation is whether CEG has demonstrated a strong academic, operational, and financial model such that it should continue to operate CPL for another ten (10) years.

I agree with the review committee that the Academic Plan and Capacity does meet the standard of the Department of Education’s scoring rubric, and through information contained within the amended application and gathered at the capacity interview, it is clear that the school supports all students, particularly students with disabilities. I acknowledge that the performance of Cornerstone Prep Lester over the charter term within the ASD has been varied. Initiated as a turnaround model, Capstone Education Group took over CPL when it was designated as one of the lowest performing schools in the state. CPL experienced academic growth and achievement before the

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<sup>6</sup> T.C.A. § 49-13-108(5)(D)

<sup>7</sup> *Id.*



COVID-19 pandemic slowed progress. When reviewing how the operator has continued demonstrating both student growth and proficiency rates over the last three (3) years, I believe that CPL has adjusted its programs in ways beneficial to students. If the trajectory demonstrated by the school leaders in the capacity interview continues, I believe that CPL remains on track to continue increasing student academic achievement and growth.

Operationally, the amended application for CPL meets or exceeds the standard for approval. Capstone Education Group is an established CMO with varied experience. They have structured their board like a traditional public school and the delineation of responsibilities and inclusion of parent and/or family engagement is a strength of their operational capacity. The intentionality of Capstone Education Group to remain in the current facility is a true testament to the network's commitment to the Binghampton community. It is imperative, however, that the work on either securing the current facility or readying a new temporary and/or permanent facility remain a high priority on day one of a new charter agreement. T.C.A. § 49-1-614(k)(3) indicates that "[u]pon expiration of an ASD charter agreement, the school must exit the ASD, and the school building must be returned to the LEA." The Commission cannot compel any district to engage in negotiations for its facilities nor is the decision of the Commission predicated on this specific facility being secured. In this case, and with regard to this standard, the Commission is charged with evaluating whether the facility plan as demonstrated by the applicant meets or exceeds the Tennessee Department of Education's scoring rubric.

During the public hearing, as indicated above, Memphis-Shelby County Schools detailed the process necessary for an entity seeking to purchase CPL's current campus. The sponsor has initiated the process to purchase the building, further evidencing its desire to remain in the current facility in the Binghampton community. Additionally, the sponsor has set forth a contingency plan should the purchase of the building not materialize if approved by the Commission. Based on my due diligence and evaluation of the application, it is my recommendation that CPL's facility plan, and overall Operations Plan and Capacity, meets or exceeds the standard for approval.

Financially, Capstone Education Group meets or exceeds the standard to continue the operation of CPL. CEG presented a sound financial budget and a positive cash flow to fiscally support the students at CPL. The largest and most complex issue for CEG is the facility. CPL is in a unique facility position because Lester Prep, a current Commission-authorized school, is housed on the same campus. Since Lester Prep achieved priority exit status, there are specific facility protections available to CEG in statute that are not available to CPL. Both financially and operationally, CEG will have to devote significant time and resources to its facility plans over the next few years for the school to be an ultimate success. While the network has demonstrated sufficient financial reserves to navigate these challenges, it is important to note that this must be a priority for the network.

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. A significant reason for my recommendation to approve the application is the track record of the network, CEG. The network has demonstrated that it can have success in school turnaround work in Memphis as it has achieved priority exit status with two of its three ASD-operated schools, including one on the same campus of CPL. The capacity interview with the school's leadership clearly demonstrated how targeted and focused the network is on success at CPL, but the overall trajectory of student growth and academic achievement must continue for CPL to be successful over time. I believe that CEG has demonstrated the overall academic, operational, and financial capacity and track record to earn an additional ten-year charter term to operate Cornerstone Prep Lester.

For the reasons expounded on in this report, I recommend that the Commission approve the Cornerstone Prep Lester Campus 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 Cornerstone Prep Lester Campus was contrary to the best interests of the students, the LEA, or community. Therefore, I recommend that the Commission approve the amended application for Cornerstone Prep Lester Campus.

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

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Tess Stovall, Executive Director  
Tennessee Public Charter School Commission

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10/2/23

Date



## EXHIBIT A

### Charter Application Review Committee Recommendation Report

October 6, 2023

School Name: Cornerstone Prep Lester Campus

Sponsor: Capstone Education Group, Inc

Location of School: Memphis-Shelby County Schools

Evaluation Team:

- Drejean Cummings
- Gus Gluek
- Rebecca Ledebuhr
- Gomer Pascual
- Whitney O'Connell
- Hillary Sims

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 the 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, and Portfolio Review and Past Performance Record.
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 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, and portfolio review and past performance.

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 four 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; 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.
  - d. Portfolio Review and Performance Record: past performance.

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:

<b>Rating</b>	<b>Characteristics</b>
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: Cornerstone Prep Lester Campus

Sponsor: Capstone Education Group, Inc

Location of School: Memphis-Shelby County Schools

Mission:<sup>1</sup> Capstone Education Group, Inc (CEG) is a charter management organization whose mission is to equip students with the Wisdom and Knowledge necessary to succeed in college and to become leaders in their community. CEG was created to provide this quality education to low-income families in the city of Memphis and seeks to accomplish that goal through the Achievement School District (ASD).

Number of Schools Currently in Operation by Sponsor: The sponsor currently has three (3) operating charter schools authorized by the Charter Commission and one (1) operating charter school authorized by the Achievement School District.

Proposed Enrollment:<sup>2</sup>

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	75	75	75	75	75	75
1	75	75	75	75	75	75
2	70	75	75	75	75	75
3	70	70	75	75	75	75
4	58	70	70	75	75	75
5	62	55	60	65	75	75
Totals	410	420	430	440	450	450

### Brief Description of the Application:

The sponsor, Capstone Education Group, Inc., is proposing to continue operation of Cornerstone Prep Lester Campus, a charter school in Shelby County, Tennessee and continue to serve students in kindergarten through 5<sup>th</sup> grade. The school, Cornerstone Prep Lester Campus, is appealing the denial of its application by Memphis-Shelby County Schools and is one of four existing schools for the sponsor. The school intends to continue to operate in the Binghampton community of Shelby County to “equip all students with the Wisdom and Knowledge necessary to succeed in college and become leaders in their community.”<sup>3</sup>

The proposed school will continue to be governed by the CEG Governing Board. In Year 0, Cornerstone Prep Lester Campus “will be funded from the existing Cornerstone Prep Lester (CPL) and CMO operating budget or reserves. Therefore, nothing is budgeted for new Year 0 expense.”<sup>4</sup> Cornerstone Prep Lester Campus will have a fund balance of \$450,000 at the end of Year 0. Cornerstone Prep Lester Campus projects the school will have \$5,426,947 in revenue and \$5,416,738 in expenses in Year 1, resulting in a balance of \$460,209. By Year 5, the school projects to have \$6,786,150 in revenue and \$6,621,269 in expenses, resulting in a positive ending fund balance of \$884,157.<sup>5</sup> The

<sup>1</sup> Original Application to the Achievement School District, 2012

<sup>2</sup> Amended Application, pg. 14

<sup>3</sup> Amended Application, pg. 3

<sup>4</sup> Amended Application, Attachment N

<sup>5</sup> Amended Application, Attachment N



school anticipates that 99% of the student population will qualify as economically disadvantaged, 20% of the student population will be students with disabilities, and 8% of the student population will be English Learners.<sup>6</sup>

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<sup>6</sup> Amended Application, pg. 14



## Summary of the Evaluation

The review committee recommends the approval of the amended application for Cornerstone Prep Lester (CPL) due to the school's strong performance in key areas, a commitment to high-quality instructional materials, robust community engagement, strong financial management, and a demonstration of their readiness to provide quality education.

CPL's Academic Plan Design and Capacity meets or exceeds the standard due to the operator's commitment to using high-quality instructional materials, a strong assessment and data analysis plan, a clear process for serving students with disabilities, and a well-structured recruitment and enrollment plan. During the capacity interview, the committee learned how the school adapted to meet student needs, particularly in closing achievement gaps through data analysis. Curriculum adjustments, including the adoption of CKLA (Reading360), are aligned with research on reading science. The applicant demonstrated a comprehensive approach to identifying special populations, convening a child study team with various professionals. In addition, the applicant's recruitment and enrollment strategies reflect intentionality and include transparent communication with parents.

The applicant's Operations Plan and Capacity demonstrates compliance with standards due to their facility plan, governance structure, and strategic approach to professional development and teacher preparation. They exhibited adaptability in explaining operational improvements and outlined contingency plans for potential facility transitions. The applicant's professional development plan was exemplary, with a shift to proactive strategies based on student data, comprehensive teacher training, and a strong partnership with Uncommon Schools. The board members bring diverse expertise and the collaboration processes, including clear feedback channels and regular meetings, are well-defined.

The applicant's Financial Plan and Capacity meets or exceeds the standard due to their strong financial expertise as a network and board, a solid financial position, flexible resource allocation, diverse funding sources, transparent budgeting, and adherence to best financial practices. Their proposed budget aligns with programmatic details and staffing descriptions, reflecting sound financial policies and procedures. The network also highlighted a substantial reserve fund and various funding sources, including board member support and the Charter School Growth Fund. CPL's financial strategy includes flexibility in allocating funds, potential options for facility-related expenses, and a well-structured five-year budget with contingency plans for revenue shortfalls. They outsource payroll and engage an accounting firm, emphasizing their commitment to fiscal prudence. Additionally, their track record with other schools demonstrates consistent adherence to sound fiscal practices.

Lastly, the Past Performance section demonstrates CPL's commitment to serving all students and employing data-driven methods to foster a success-oriented environment. Although CPL has not achieved priority exit status within its charter term, there is clear evidence of the network effectively addressing achievement gaps through data analysis. The operator's growth and evolution while operating schools in Memphis are evident, and the operator has produced promising results in reading and mathematics. The network and school team provided candid and data-driven responses, acknowledging challenges, and highlighting successful adjustments. The network stated that they aim to maintain a consistent growth rate, achieve TVAAS standards, and meet Annual Measurable Objectives (AMO) targets across all subjects. The network and school team's commitment to data-driven decision-making is evident, with tailored learning labs, systematic data assessments, and a clear understanding of data's role in addressing student needs and achievement gaps.

### 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 approval<sup>7</sup> 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:

<b>Sections</b>	<b>Rating</b>
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
Portfolio Review and Performance Record	Meets or Exceeds Standard

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<sup>7</sup> Tennessee Charter School Application Evaluation Rubric – Ratings and Scoring Criteria, pg. 1

## **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 or exceeds the standard based on the operator's strong commitment to leveraging high-quality instructional materials in response to student data, a strong internal assessment and data analysis plan, a clear articulation of their process for identifying and serving students with disabilities, and a well-structured plan for student recruitment and enrollment pending a transition from a zoned to an open-enrollment school.

During the capacity interview conducted with representatives from both CEG ("the network") and CPL ("the school"), the review committee gained deeper insight into how CPL has adapted to meet the needs of its student population to begin demonstrating academic gains necessary to close achievement gaps. It is clear from the application and the capacity interview that both the school and network leadership team collect and utilize student data through numerous internal assessments, organized in a data dashboard that leadership and teachers analyze to meaningfully drive student performance.

The applicant discussed their curriculum and intervention adjustments during the capacity interview, highlighting their impact, as well as their implementation of the RTI<sup>2</sup> model and its direct impact on student academic achievement. As evidenced by internal assessment data and more recent TVAAS and TCAP data, it is clear that their curriculum changes have started to yield positive results in student academic growth. The applicant switched their curriculum to CKLA (Reading360) to align with research on the science of reading and foundational literacy requirements. The network's Chief Academic Officer elaborated within the capacity interview on the selection of curricula for specific grade bands across the network, explaining the rationale behind each choice, and sharing the successes observed within internal assessment data so far, such as the use of Reveal Math for grades K-5 for both curriculum and intervention and StemScopes for science.

Regarding the process for identification of special populations, the applicant shared their comprehensive approach, emphasizing that the school's child study team convenes regularly to review data from the RTI<sup>2</sup> process and considers referral information from both parents and teachers. This child study team includes professionals like school psychologists, occupational therapists, physical therapists, and other coordinators. It is evident that the applicant is deeply committed to meeting the needs of all students, as they discussed their awareness of student ACEs (Adverse Childhood Experiences) and their goal to provide appropriate support for all students regardless of identification. The school also has adjusted their intervention and RTI<sup>2</sup> process to be responsive to student need, with an hour block for all grades. The applicant provides training and coaching for teachers around data analysis, particularly with foundational literacy gaps, to ensure students are receiving not only required services but best-practice, differentiated instruction. This detailed process reflects the intentionality of the applicant in ensuring that all students are identified and served effectively.

In terms of student recruitment and enrollment, the applicant has gained valuable experience over the past two years. CEG has two campuses that have already undergone a transition between authorizers, and the review committee found intentionality in the applicant's responses to questioning surrounding enrollment and recruitment of students. For example, the applicant notes sending out multiple levels of communication and having discussions with parents to assure them of consistency in teacher quality and support in the event of a transition, and to walk through the new open-enrollment process, ensuring families are aware that students will not lose their seats. Additionally, the expectation is that new apartment complexes nearby, set to open summer 2024, will attract new



families. The goal is to communicate transparently with families, ensuring that CPL remains the best educational option for students within the neighborhood. If necessary, there is also a willingness to expand outreach to other areas of the city.

The applicant provided a comprehensive overview of their community partners, highlighting their diverse roles, such as providing support for students and their families, furnishing school supplies, and assisting in communication with newer refugee families and students. They placed special emphasis on the role of the parent engagement specialist, who organizes events like "Doughnuts for Dads," Grandparents' Day, and ensures access to washers and dryers on-site for students' uniform needs. Additionally, the team stressed their commitment to proactive communication with parents to keep them informed about available services.

## **Analysis of the Operations Plan and Capacity**

*Rating: Meets or Exceeds Standards*

### **Strengths Identified by the Committee**

The applicant's Operations Plan and Capacity meets or exceeds the standard due to their facility plan and contingencies, a strong governance structure, and a clear tactical approach to professional development and teacher preparation.

The applicant demonstrated their adaptability in the Operations Plan and Capacity section of the application and during the capacity interview. They were able to clearly explain the operational adjustments over time to improve services and instruction for students, as well as their outlook for the future as both a school and a network at large. Regarding the impending potential facility transition given what is outlined within T.C.A. § 49-1-614(k)(3), the applicant stated that they have already made an offer on the current building to Memphis-Shelby County Schools, engaged with a broker regarding this process, explored additional potential land options should they be unable to work with MSCS to acquire the facility, and secured permission to place several learning portables on additional properties. However, CEG mentioned that they are currently operating under a three-year lease with an option to buy their current space as CPL shares a facility with Lester Prep, a Commission-authorized charter school. They are hopeful given their current facility situation that they will be able to acquire the current facility from MSCS to continue operation and service of the neighborhood community, which is their first priority.

The review committee found the applicant's professional development plan to be exemplary. The applicant explained during the capacity interview how their approach has shifted from being reactive to proactive as a response to student data. For instance, when introducing a new assessment, they follow up with sessions on how to effectively administer the assessment and subsequently utilize the data the assessment generates to drive student performance. They also described how teachers are trained to analyze student data deeply, identify misconceptions, and plan interventions accordingly. Teachers not only use nationally normed internal assessments, but also daily exit tickets to inform the next day's lesson or intervention, and the network and leadership team supports teachers in this practice through effective coaching. Furthermore, teachers are being equipped with the "Teach Like a Champion" classroom culture techniques to minimize distractions and maximize learning time. It is clear both within the application and during the capacity interview that the professional development plan for teachers is intentional and robust, and designed to drive student performance and close achievement gaps. The applicant provided extensive information about their new professional development partnership with Uncommon Schools, with whom they have recently intensified collaboration with over the last year. Through this partnership, CPL has been able to solidify the professional development that they conduct with teachers in the summer and provide better leader training and coaching throughout the year.

In the CPL application, there were current resumes of all seven board members and a well-defined process for their collaboration with the network. These board members bring diverse expertise in marketing, education, legal matters, non-profit management, construction, community partnerships, and finance. Additionally, there is a robust procedure in place for handling complaints effectively. The effectiveness of the network is evident through the achievements of the network, with two out of the three operating schools eligible earning priority exit status and successfully transitioning to the Commission. Moreover, the network-level staff members exhibit a remarkable ability to analyze and communicate student-level data, showcasing the strength of the organizational structure. The priorities are closely aligned between the school and the network, as clearly demonstrated by their blueprint. Despite the absence of board members during the capacity interview, the review committee had no lingering questions about



their involvement and oversight of the school, primarily due to the clear and well-defined structure of the board that had been outlined in the application.

When inquiring about teacher support, the school and network teams emphasized the continuous, ongoing process of both informal and formal observations and coaching at CPL. They stated that their evaluation model was internally created in alignment with their model and approved by the State Board of Education and the Department of Education. In terms of teacher growth and retention, they noted that two of their teachers have transitioned into leadership roles, indicating a positive professional development trajectory. They also pointed out that eighty percent of CPL staff that they wanted to return for the next year were offered and accepted returning contracts, signifying teacher satisfaction.

## **Analysis of the Financial Plan and Capacity**

*Rating: Meets or Exceeds Standard*

### **Strengths Identified by the Committee**

The applicant's Finance Plan and Capacity meets or exceeds the standard due to the high level of financial expertise as a network and a board, the strong financial position of the network, flexibility in resource allocation, diverse funding sources, transparent budgeting, and adherence to best financial practices.

Within the application, the proposed budget matches the programmatic details and staffing described throughout the application. The applicant outlined sound financial policies and procedures and a demonstration of financial expertise that reflects the network's financial prudence and sound practices over the past nine years. During the capacity interview, representatives of the network highlighted a five-million-dollar reserve fund that was also mentioned in the financial section of the application. CPL also benefits from multiple funding sources outside of student-based funding, including support from a board member and a substantial commitment from the Charter School Growth Fund. This diverse funding base provides a strong financial foundation and allows for the school to provide additional wrap-around services and programming to students.

CPL's financial strategy includes flexibility in allocating funds, particularly for facility-related expenses. If necessary, they are prepared to allocate resources for intensive renovations at another site or even consider options like securing grant funds, engaging in fundraising efforts, or obtaining loans if faced with the need to build a new facility. In addition, the applicant has submitted a well-structured five-year budget that includes comprehensive procedures, clear budget assumptions, and detailed narratives concerning expenditures and revenues. They have also devised contingency plans to address potential shortfalls in revenue. Recognizing that some of their schools may experience under-enrollment, they have developed strategies to address lower-than-anticipated enrollment and other possible revenue fluctuations. The operator also outsources their payroll and engages an accounting firm, and these practices underscore their dedication to maintaining high standards of fiscal prudence. The applicant also discussed that they have continuously met standards on the financial section of the Commission's school performance framework for their three other schools, demonstrating sound fiscal practices.

## **Analysis of the Portfolio Review and Performance Record**

*Rating: Meets or Exceeds Standard*

### **Strengths Identified by the Committee**

The applicant's Portfolio Review and Performance Record meets or exceeds the standard due to the school's and network's demonstrated commitment to serving all students and employing data-driven methods to foster a success-oriented environment. Although CPL has not earned priority exit status within its charter term, like the two other schools within the CEG portfolio previously under the ASD, the network effectively demonstrated their ability to address achievement gaps and past performance given their complex student analysis and response to student data.

The operator's growth and evolution over their tenure of operating schools in Memphis are clearly evident, as they have delivered promising results that align with the changes made in their academic approach. The current CPL school leader shared within the capacity interview the school observed a 228% growth in reading ability on TNReady for 3<sup>rd</sup> grade proficiency. She further noted improvements in mathematics, with CPL consistently outperforming the ASD and MSCS, and being just 5 points away from the state average. Finally, they shared in the capacity interview that they missed earning priority exit status CPL by one point in the 2021-22 school year. While CPL is still identified as a priority school based on the 2021-22 school year data, the school has shown year over year student academic growth, which demonstrates that overall academic process is occurring under CEG.

During the capacity interview, when asked about specific trends over the last decade illustrating CEG's positive impact on CPL, the responses were candid, transparent, rooted in student data, and solution focused. Both network and school team members effectively articulated the school's journey since being acquired by the network, acknowledging challenges, sharing the steps taken, and highlighting successful adjustments made along the way. They also shared that as they dove deeper into data analysis during the summer, it became apparent that although their students face challenges in proficiency, there are standards or subsections they perform well in. For example, they shared that, overall, students encounter difficulties in number and operations but excel in equations and expressions. In ELA, they saw better performance in informational text versus literature. They have subsequently placed a focused effort on addressing the areas in which students score lower. They also shared their goal to maintain a consistent growth rate of 1.5 years, achieve TVAAS standards, and meet Annual Measurable Objectives (AMO) targets across all subjects. They stated their plan to reduce chronic absenteeism to 20%, while progressing toward the objective of attaining 30% mastery across all subjects.

When addressing barriers to success, school leaders acknowledged the significant challenges students face daily due to trauma and environmental factors. In response, CEG places a strong emphasis on equipping all K-5 teachers, including exceptional education and English Learner teachers, with the necessary skills to teach foundational reading effectively. This approach aims to maximize students' growth during their time at CPL. During the capacity interview, the applicant spoke to the high transiency of the neighborhood, which translates to higher-than-average student mobility within the school. This means that students who start at CPL do not necessarily finish at CPL, and many students join midyear. It is therefore important for the school to focus on student growth, as the students that are joining the school are often multiple grade levels behind, which impacts their overall achievement data. CPL leadership closely tracks internal growth assessment data for students to ensure they are making more than 1.5 years of growth per year, which they aim to translate to higher academic proficiency and strong performance on TVAAS.

The network and school team's commitment to data-driven decision-making was evident, with a clear



understanding of the assessments used to measure academic skills and their purposes. Learning labs have been tailored to target specific needs of students, with biweekly assessments systematically uploaded into the Illuminate system for data disaggregation by homeroom and subgroups. This strategy aims to build a pipeline of successful students from the neighborhood who thrive academically and culturally and allows teachers to respond to student academic needs in real time through daily differentiated instruction. Additionally, a clear strength was the awareness and knowledge across both the school leadership team and the network of all data, both internal and past state-level data. There is demonstrated alignment in responses to this data showing that the applicant has a clear approach to addressing student learning needs and achievement gaps.





## Evaluation Team

**DreJean Cummings** joined the Tennessee Charter School Commission in 2021, serving as the Special Assistant to the Executive Director. Prior to working at the Commission, DreJean held a variety of roles at the Tennessee Department of Education, most recently as the Research Manager for the Research and Evaluation team. She holds a Bachelor of Arts degree from Rhodes College and a Master of Public Policy from Vanderbilt University.

**Gus Gluek** is currently a PhD student at the University of Pennsylvania studying education policy and data analytics. Prior to pursuing his PhD, Gus was a research analyst at the Tennessee Board of Regents. While his research spanned a variety of topics, his most recent research focused on adult students' success across the state. Gus also taught high school math for three years in South Carolina where he was recognized by the district for having one of the highest end-of-course Algebra exam passage rates for two consecutive years. Gus has a Master of Public Policy from Vanderbilt University and a Bachelor of Arts from Colby College.

**Rebecca Ledebuhr** is the Data and Accountability Coordinator at the Tennessee Public Charter School Commission. Before taking on her role at the Charter Commission, Rebecca spent fourteen years working in public schools in North Carolina and Tennessee. Most recently, she served as an instructional coach for mathematics at an MNPS public charter school. Rebecca has served on the Nashville Public Education Foundation's and Mayor's Teacher Cabinet, as a mentor teacher for the Nashville Teacher Residency, and as a Tennessee Educator Fellow for the State Collaborative on Reforming Education (SCORE). Rebecca holds a B.A. in Philosophy and Religion from James Madison University.

**Gomer Pascual** is the Finance Programs Manager for the Tennessee Public Charter School Commission. Prior to joining the commission, he served the Tennessee Department of Education for 14 years and was the budget director prior to his departure from the department. Before coming to the United States, he was a former college instructor of accounting and business management for Tomas del Rosario College in the Philippines for 8 years and a computer teacher to K-6 students of the same school. He graduated with a bachelor's degree in accounting and a Master's in Business Administration from the same school where he honed his teaching skills. He loves working with his colleagues in the Tennessee Public Charter School Commission.

**Whitney O'Connell** started her career as an elementary educator and received her Masters of Education in Curriculum and Instruction, with an ELL endorsement, from the University of Washington. In her years of teaching, she taught nationally and internationally, across many school settings - including in Metro Nashville Public Schools. Aside from being a classroom teacher, Whitney has experience in curriculum writing, professional development, and education-related research. Whitney is now a Curricular Solution Architect at Newsela - partnering with districts in developing custom curriculum and digital resource implementation.

**Hillary Sims** has been a founding school leader of several Tennessee Charter Schools beginning shortly after the passing of Chapter 13. Ms. Sims holds BS degrees in both Psychology & Sociology from East Tennessee State University, a MS in Holistic Teaching and Learning & History, and an EdS in Comprehensive and Modified, K-12 Special Education from UTK. Ms. Sims has current licensure in seven subject areas in Tennessee to include an administrator's license. Having taught in traditional public and private schools as well as served as a school administrator for greater than 10 years, Ms. Sims brings a broad scope of school academics, culture, operations, and governance as a reviewer. Ms. Sims has contributed to charter school improvement across the United States while working at a global charter management organization. Ms. Sims has served on the Governor's Advisory Council for Students with Disabilities, served as a charter review team member for the State Board of Education for six years, and is now reviewing for a third year with the TPCSC. Areas of expertise are Students with Disabilities, Adolescent Mental Health, Special Populations, Compliance, Holistic Learning Strategies/Universal Design Learning, Culturally Responsive Pedagogy,



Discipline/Culture, and School Leadership. Ms. Sims currently serves as an Exceptional Education Coach for Metropolitan Nashville Public Schools.