



## **Executive Director's Recommendation**

### **Nashville Collegiate Prep High School 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 1, 2023, the sponsor of Nashville Collegiate Prep High School ("sponsor") appealed the denial of its amended application by the Metro Nashville Public Schools (MNPS) 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 Nashville Collegiate Prep High School (NCPHS) 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 approve the amended application for Nashville Collegiate Prep High School.

#### **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 NCPHS'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. On November 29, 2022, the sponsor submitted a letter of intent to MNPS expressing its intention to file a charter school application.
2. The sponsor submitted its initial application for NCPHS to MNPS on February 1, 2023.
3. MNPS assembled a review committee to review and score the NCPHS initial application.
4. On March 21, 2023, MNPS's review committee conducted a capacity interview with representatives of NCPHS.

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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.*

5. MNPS's review committee reviewed and scored the NCPHS initial application and recommended to the MNPS Board of Education that the initial application be denied, indicating the academic, operations, finance, and past performance sections partially met standards.
6. On April 26, 2023, the MNPS Board of Education voted to deny the NCPHS initial application based on the review committee's recommendation.
7. The sponsor amended and resubmitted its application for NCPHS to MNPS on May 26, 2023.
8. MNPS's review committee reviewed and scored the NCPHS amended application based on the charter application scoring rubric.
9. MNPS's review committee rated the academics, operations, and past performance sections of the NCPHS amended application as partially meets standard and the finance section as does not meet standard and recommended denial to the local board of education.
10. On July 25, 2023, the MNPS Board of Education voted to deny the amended application of NCPHS.
11. The sponsor appealed the denial of the NCPHS amended application in writing to the Commission on August 1, 2023, including submission of all required documents per Commission Policy 2.000.
12. The Commission's review committee independently analyzed and scored the NCPHS amended application using the Tennessee Department of Education's charter school application scoring rubric.
13. The Commission's review committee conducted a capacity interview with key members of the NCPHS leadership team on September 7, 2023 via Microsoft Teams.
14. On September 11, 2023, the Commission staff held a public hearing at Davy Crockett Tower in Nashville, Tennessee. At the public hearing, the Executive Director, sitting as the Commission's Designee heard presentations from the sponsor and MNPS and took public comment regarding the NCPHS amended application.
15. After the capacity interview, the Commission's review committee determined a final consensus rating of the NCPHS amended application, which served as the basis for the Review Committee Recommendation Report, attached hereto as **Exhibit A**.
16. The Commission staff conducted a full review of the record which includes the initial and amended applications submitted by the sponsor, documentation submitted by MNPS, and the findings of the public hearing and public comment. The Commission's General Counsel conducted a full review and legal analysis of the record.

## **FINDINGS OF FACT**

### **Substantial Negative Fiscal Impact Findings and Analysis**

At the July 25, 2023 board meeting, the MNPS Board of Education voted to deny the amended application of NCPHS citing five (5) reasons for denial, including a finding of a substantial negative fiscal impact to Metro Nashville Public Schools. 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. 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 NCPHS:

1. NCPHS's amended application states that in the 2024-25 school year, NCPHS's first anticipated year of operation, it will enroll a maximum of 150 students.<sup>5</sup>
2. Commission staff requested from MNPS historical trends of projected Average Daily Membership (ADM) versus actual ADM for the current and three (3) preceding school years. The table includes actual ADM by year, the percentage growth from the previous year, the district's projected student growth for that year, and actual student growth seen.

**Table 1. Historical ADM and System Growth<sup>6</sup>**

	Actual ADM	% Growth From Previous Year	Projected Student Growth	Actual Student Growth
<b>SY24-25 (Projected)</b>	76,339	-0.83%	-639	N/A
<b>SY 23-24 (Projected)</b>	76,978	-0.23%	-213	-178
<b>SY 22-23</b>	77,191	0.40%	-3,079	309
<b>SY 21-22</b>	76,847	-1.56%	-1,352	-1,218
<b>SY 20-21</b>	78,065	-4.01%	512	-3,263

3. MNPS estimated that the total fiscal impact during Year 1 of NCPHS's operations would be \$1,185,000. This amount is based on the number of projected students multiplied by the difference between the estimated charter school per pupil amount allocation and the average MNPS school-based budget per pupil amount and is reflective of a per pupil rate of \$7,900. The rationale for MNPS using a per pupil rate that is below the total state and local revenue is due to the district utilizing a budget model that allocates more than half of their district's operating budget directly to the school level, with the remainder being used for district-wide services such as transportation, security, maintenance, and utilities.<sup>7</sup> For the purpose of estimating substantial negative fiscal impact, the district only accounted for the district-wide or fixed cost portion of state funding.
4. The Commission staff reviewed the district's past audits and gathered the fund balance committed for education since 2019-20.

<sup>5</sup>Amended Application, pg. 15-16

<sup>6</sup> All data provided by Metro Nashville Public Schools in response to the Commission's August 2, 2023 request for information.

<sup>7</sup> Id.

**Table 2. Fund Balance Committed for Education<sup>8</sup>**

	<b>Fund Balance Committed for Education</b>	<b>% Growth From Previous Year</b>
<b>SY 21-22</b>	\$244.5 Million	115%
<b>SY 20-21</b>	\$113.8 Million	311%
<b>SY 19-20</b>	\$27.7 Million	N/A

5. The Commission staff pulled the total per pupil allocation (PPA) for Metro Nashville Public Schools based on the historical PPA received for Commission authorized charter schools located in MNPS.

**Table 3. Total Per Pupil Allocation<sup>9</sup>**

	<b>Total State and Local BEP Revenue</b>
<b>SY 22-23*</b>	\$14,416
<b>SY 21-22</b>	\$14,953
<b>SY 20-21</b>	\$13,050

\*Awaiting final true up for PPA

### **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 MNPS in support of its argument, I cannot conclude that MNPS has carried its burden of proving that the approval of NCPHS's application will present a substantial negative fiscal impact on the district.

The crux of the MNPS argument rests on the fact that state law requires districts to transfer 100% of the per-pupil revenue to a charter school, and the opening and operations of NCPHS in Year 1 would result in a loss of \$1.18 million in revenue that goes towards fixed costs that the district could not handle operationally and financially.<sup>10</sup> MNPS calculated the fiscal impact by utilizing the number of projected students enrolled in NCPHS multiplied by the difference between the estimated charter school per pupil amount allocation and the average school based budget per pupil amount. The district's argument rests on the premise that the district cannot remain financially stable with the reduction of \$1.18 million to support the district's fixed costs. However, based on the data provided by MNPS, there is clear evidence that the district has enrollment fluctuations annually and annual growth in state and local revenue amounts over time. The district states that, despite the reduction in students enrolling in MNPS schools as a result of the opening of charter, fixed costs do not change, and the district does not have the ability to adjust expenses on a system-wide basis. However, the district has historically managed enrollment increases and declines greater

<sup>8</sup> Metropolitan Government of Nashville and Davidson County Comprehensive Annual Financial Report for 2022, p. 158; 2021, pg. 146; 2020 p. 144

<sup>9</sup> Tennessee Department of Education payments to the Charter Commission

<sup>10</sup> Metro Nashville Public Schools Board Presentation, July 25, 2023

than what they would see if NCPHS opened, and despite these fluctuations, the district’s financial position has continued to increase over the past few years, with fund balances exceeding the State requirement of 3%.

Over the last few years, that district has seen enrollment fluctuations that, on average, represent approximately 1.4% of ADM. MNPS saw a 4% drop in enrollment directly tied to the pandemic, but then saw a slight enrollment increase in SY22-23 when compared to the previous year. In all of the enrollment data presented, the district has seen both enrollment growth and enrollment declines within the enrollment amounts projected by NCPHS. Additionally, since NCPHS’s application proposes an articulation agreement with Nashville Collegiate Prep, a current operating school serving 616 students, the fiscal impact to MNPS will be less because MNPS is not currently receiving the per pupil allocation for these students. If approved, the high school will create a K-12 feeder pattern with the existing lower school, thus decreasing the total number of current MNPS students that may need to be recruited to attend the school. Therefore, the district regularly manages to sustain its operations and financial sustainability in the district’s enrollment despite enrollment fluctuations above and beyond the impact of opening the proposed charter school.

Moreover, the information contained within the past three (3) years of audits reinforces the fact that MNPS’ financial position has continued to increase, despite fluctuations in enrollment. This is demonstrated by the General Purpose School Fund having a healthy fund balance committed to education that has grown annually based on its annual audits for the past three (3) years (Table 2). This signals the likelihood of continued financial health and a strong financial position for the district. This is further affirmed by the increased per pupil allocation amount year over year (Table 3), and the proposed transfer amount from MNPS to NCPHS in Year 1 is less than 1% (0.11%) of the projected revenue for the district in the 2023-24 school year<sup>11</sup>.

In totality, there is a lack of evidence provided by MNPS to meet the burden of proving that the approval of NCPHS 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 NCPHS, the data demonstrates that despite enrollment fluctuations, the district’s financial position continues to improve.

Based on these findings of fact and analysis, I find that the evidence provided by MNPS does not meet the burden of proving that the approval of NCPHS 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 MNPS to review and score the NCPHS initial application consisted of the following individuals:

<b>Name</b>	<b>Titles</b>
Gay Burden	External Reviewer
Krista Davis	Research Assessment and Evaluation
Molly Hegwood	English Learners
Ryan Latimer	Boundary Planning and Enrollment Forecasting
Debra McAdams	Exceptional Education
Casey Megow	Planning and Construction

<sup>11</sup> Metropolitan Government of Nashville and Davidson County FY 23-24 Budget Book p. 735



Name	Titles
Elisa Norris	Strategy Performance Management
Ken Stark	Business and Facility Services
David Williams	Teaching and Learning
Joshua Wright	Strategic Investments

The NCPHS initial application received the following ratings from the MNPS 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
Portfolio Review	Partially Meets Standard

After the MNPS review committee completed its review and scoring of the initial application, its recommendation was presented to the MNPS Board of Education on April 26, 2023. Based on the review committee's recommendation, the MNPS Board of Education voted to deny the initial application of NCPHS.

### District Denial of Amended Application

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

Sections	Ratings
Academic Plan Design and Capacity	Partially Meets Standard
Operations Plan and Capacity	Partially Meets Standard
Financial Plan and Capacity	Does Not Meet Standard
Portfolio Review	Partially Meets Standard

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

### Commission Review Committee's Evaluation of the Application

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

Name	Title
Trent Carlson	Commission Staff
Halli Faulkner	External Reviewer
Beth Figueroa	Commission Staff
Mark Modrcin	External Reviewer
Hayden Pendergrass	Commission Staff

Name	Title
Clare Vickland	External Reviewer

The review committee conducted an initial review and scoring of the NCPHS 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 NCPHS 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	Meets or Exceeds Standard

The review committee recommends the approval of the amended application for Nashville Collegiate Prep High School because the applicant demonstrated a clear academic plan aligned to the mission and vision of the school, the applicant provided a robust five (5)-year network plan that supports the opening of the proposed high school, and the proposed school would fulfill a complete K-12 academic option for families in southeast Nashville.

The academic plan presented by the applicant was found to meet the standard because the applicant detailed their experience of successfully operating a school with the proposed model and demonstrated how the plan was specifically tailored to meet the unique needs of the target community. The review committee noted that through both the application and the capacity interview, the applicant adequately addressed the plan to serve special populations of students, which included details for how the academic model will support English learners, who the school projects will make up a relatively large portion of the student population. Additionally, during the capacity interview, the applicant further described the ties the currently operating K-8 school has developed with the community and the demand seen to open a smaller high school in the area to complete a K-12 educational pathway. In totality, the committee found sufficient evidence to demonstrate the need for an additional high-quality, smaller public option in the area.

The applicant’s operations plan was found to meet the standard because the proposed school will be supported by the ReThink Forward governing board and charter management organization (CMO), Noble Education Initiative (NEI), each of which demonstrated their capacity for supporting high-quality schools. The review committee found that the applicant outlined a sound, realistic start-up plan, which includes land that has already been secured for a facility. It was noted the governing board and CMO successfully opened the currently operating K-8 school using largely the same start-up plan. The professional development plan detailed in the application was also noted to be a strength by the review committee, and there is an experienced team at the CMO level dedicated to providing support for school-based staff.

The financial plan was found to meet the standard because the applicant provided a reasonable, flexible budget, has a history of strong financials at currently operating schools, and, in the capacity interview, was able to clearly explain contingency plans should anticipated funding not materialize as projected. In the capacity interview, the applicant explained contingency plans regarding facility construction and clarified that the currently operating K-8 school is building a new facility that has the capacity to house a 9<sup>th</sup> grade class should the proposed high school be approved. This plan allows construction of the high school’s facility to take place and open as the proposed school scales, while also not financially jeopardizing the currently operating school should the proposed high school not be approved.

Lastly, the Portfolio Review and Performance Record were found to meet the standard because the applicant team has successfully opened a K-8 school that serves over 600 students and had Year 1 academic performance that is overall comparative to the academic performance of the resident district. The review committee found clear operational and financial success of the operator, and in the capacity interview, the school leadership and network team spoke in depth about their experience implementing similar models and curricula with a high level of success in other locations.

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

For additional information regarding the review committee's evaluation of the NCPHS 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>12</sup> and Commission Policy 2.000, a public hearing chaired by the Executive Director was held on September 11, 2023. MNPS's presentation at the public hearing focused on the process the district and its review committee took upon receiving an application from the sponsor, as well as the reasons for denial of the amended application. Representatives from MNPS indicated that NCPHS's amended application was denied based on findings within the MNPS Charter Schools Office's review, the substantial negative fiscal impact to the district, and a lack of community support within the application. Additionally, the district cited their evaluation of the network's past performance as reasons for denial, noting a network school did not meet academic standard within an annual report from the Commission, and the school demonstrating lower performance than the district.

In the sponsor's opening statement, a member of the ReThink Forward governing board focused on three issues noted as part of the district's reasons for denial: the fiscal impact on the district, the past performance of the board's currently operating schools, and the proposed high school being in the community's best interest. In his discussion regarding fiscal impact, the board member stated that the fiscal impact the district would experience is a result of how state and local funds are required to be distributed to charter schools in accordance with statute. Additionally, it was stated that the district did not sufficiently prove the impact would be substantial to the district beyond what is required in law. The sponsor continued by describing the work that the proposed CMO, NEI, has done at the other local schools it operates and contended that the lower performance than the district that MNPS cited was only applicable to one grade and one subject within that grade. Lastly, the sponsor responded to the district's rating of does not meet on the financial plan by pointing out the currently operating schools has received clean audits each year, has built up a school fund balance of over \$1 million, and has a viable plan for the construction of a new facility that has plans to incubate the high school for the first year if approved.

During questioning by the Commission, MNPS first described the process taken by its review committee to determine initial and final ratings of the submitted application. The district clarified that the reason why one rating was moved from a partially meets to a does not meet after completing a review of the amended application and conducting a capacity interview was due to the applicant not sufficiently responding the specific concerns of the review committee in the initial application. MNPS then went on to answer questions regarding the substantial negative fiscal impact cited as a reason for denial, indicating that the negative fiscal impact was based on the number of students projected at capacity and the per pupil amount assuming those students opted out of an MNPS school.

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<sup>12</sup> T.C.A. § 49-13-108



The district then discussed enrollment trends in the area, stating that, overall, the district is projecting a slight decline in the coming years in the cluster of schools identified in the proposed school's application. When asked about how the district considered the applicant's past performance, MNPS representatives stated that it was found to partially meet standard as the school identified scored a TVAAS 3 in the 2021-2022 school year, whereas MNPS as a district scored a TVAAS 5, and that the school's 5<sup>th</sup> grade ELA achievement scores were lower than MNPS's 5<sup>th</sup> grade ELA achievement scores. The district also stated that the review committee cited that the currently operating school did not meet the standard of the Commission's academic performance framework in its first year of operation, to which it was held accountable. Lastly, the district responded to a question regarding its noted concerns with the application's requests for waivers, which were in essence the same as previously approved waivers by the district, saying that the office is currently undergoing a thorough review of all requested and approved waivers, including those of its currently operating schools. Therefore, the district has now started citing waiver concerns as a primary reason for denial.

The Commission then questioned the sponsor, beginning with a question regarding the board and network's capacity to simultaneously operate one school and open two additional schools, should the high school be approved. The sponsor stated first the board has plans to grow and increase its representation from the community, and the sponsor continued by describing the recent hires made at the CMO level to ensure adequate staffing is in place to support its schools. The Commission then asked a question regarding demonstrated community support for the high school such that the school could meet its enrollment targets. NCPHS described the process they undertook to gauge the interest of their current families, which they indicated was overwhelmingly strong. Additionally, the school stated that while the current waitlist of the operating school is relatively small at each grade level, that is intentionally so as they pulled back on student recruitment as they met their enrollment capacity. The sponsor stated they are confident they could have built a larger waitlist if they had wanted. Additionally, the proposed school leader detailed the community engagement efforts she has already made and the consistent demand from families at the middle school grade levels that she has seen. When asked about plans to ensure the proposed school would have appropriate staffing structures in place to support special populations of students, the sponsor stated that the application is based on current student ratios, and the school is prepared to adjust its staffing based on student enrollment to remain compliant. Lastly, when asked to speak directly to the CMO's experience with high school, the sponsor discussed experience successfully turning around high schools in Indianapolis as well as the experience of the school leader opening and operating high schools.

The public hearing concluded with closing statements by both parties and the receipt of six (6) in-person comments, with one (1) speaking in support of MNPS and five (5) speaking in support of NCPHS. The Commission also accepted written comments, and the Commission received 196 written comments, with seven (7) writing in support of MNPS and 189 writing in support of NCPHS.

## **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>13</sup>," whether "approval of the application is in the best interests of the students, LEA, or community<sup>14</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

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<sup>13</sup> T.C.A. § 49-13-108(5)(D)

<sup>14</sup> *Id.*

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 MNPS, 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 NCPHS amended application does rise to the level of meeting or exceeding the standards required for approval.

Based on a review of the review committee's report, which encompasses both the information contained within the amended application and the capacity interview conducted by the committee, I agree that this application meets or exceeds the standards outlined by the Department of Education. Many of the concerns raised during the district's review were sufficiently addressed via the capacity interview with the sponsor through targeted and direct questions about community demand and support, facility planning, network financing, and portfolio performance such that, when taken with the amended application, the sponsor clearly demonstrated that it is prepared to complete its feeder pattern and open a high school.

The sponsor has set forth an academic plan with a clear mission and vision that is a continuation of its currently operating Nashville Collegiate Prep which is authorized by the Commission. Approval of this application would be an agreement to continue this model through grade 12. The academic goals set forth in this amended application are aligned to the current mission and vision of the school. These goals have been scaled for its high school model and speak to the high expectations the operator has for its high school. As detailed in the application and confirmed within the capacity interview, the sponsor has established a plan that meets the standards for serving special populations and will adjust this plan, as necessary, to meet the needs of its students.

While the local district noted that the current school is not meeting academic standards under the Commission's framework, it is important to note the context of the rating from the Commission's perspective and how the Commission uses this rating when evaluating a charter school's performance. The academic performance rating referenced by MNPS was after Nashville Collegiate Prep's first operating year of 2021-22, and in its first year, it opened with grades K-5 with approximately 318 students. The vast majority of the school's students entered academically behind grade level, and most students had spent the prior 1.5 years learning at home or virtually because of the COVID-19 pandemic. Therefore, in Year 1, the school met or exceeded most of MNPS's district success rates, and the only grade where the school's success rate was lower than MNPS was 5<sup>th</sup> grade where students had spent five (5) years in other non-Nashville Collegiate Prep schools. For Year 1 schools, the Commission has set a threshold that, in order to meet standard in student academic proficiency, a school must achieve a 30% success rate or higher in each tested subject. When adopting the framework, the Commission recognized that this is a high bar for Year 1 schools, but felt it was important to establish on the front-end the expectations for academic success over the life of the ten (10)-year charter agreement. Additionally, the Commission does not change these thresholds year over year to ensure overall consistency, and they were not adjusted for the results of the COVID-19 pandemic. Moreover, these are not thresholds that MNPS as a district in 2021-22 would have met based on their success rates.

It is important to note that Nashville Collegiate Prep did meet standard on the Commission's framework when it came to its comparative performance against the resident district (MNPS) and for academic growth with a TVAAS 3. Moreover, the Commission has an intervention policy that it will use and has used for schools where the Commission has concerns about its academic performance. Since the Commission understands the overall context of a school in its first year of operation, the Commission did not note any further concerns about the academic performance of

Nashville Collegiate Prep. When looking at the school's first year operational and financial health, it is clear that the organization has a high level of success that it continues to build on. In fact, Nashville Collegiate Prep has proven to be a strong partner with the Commission, is responsive to requests or concerns, and remains compliant with applicable laws. While always striving for the highest of quality of charter schools under its portfolio, the Commission also recognizes the difficulty of a school opening with grades K-5 and expects the school to achieve long-term academic success in order to be renewed at the end of their charter agreement. The Commission also expects schools to support students where they are academically when they enter the school.

I deeply appreciate the families of the school's desire to have a K-12 pathway that is a smaller, more individualized and community center model. It is clear by the growth in enrollment that the school has seen since opening in the 2021-22 school year (from over 300 in Year 1 to over 600 in Year 3) that the community is committed to the school and its model. The Commission's review is whether the amended application "meets or exceeds the standards of the state's scoring rubric and whether approval is in the best interest of the students, the LEA, or community." The families of the current Nashville Collegiate Prep have shown a commitment to this option and pathway, and those noted desires factor into the best interest of the students, the LEA, or the community.

In regard to an operational analysis, I believe that the amended application for Nashville Collegiate Prep High School meets the standard for approval. The sponsor has an established governing board and a plan to expand its membership as deemed necessary to ensure diversity of knowledge and representation and to reflect its increased footprint of public charter schools. The sponsor has a dedicated long-term facility which will serve as the campus for the existent middle and proposed high school. This land has been purchased and construction has started for a Fall 2024 opening. I do not share in the local district's concerns related to professional development and staffing, as named in the evidence findings, as the sponsor detailed during the capacity interview ongoing trainings for teachers and staff, as well as setting forth the structure of the state level work as the ReThink Forward and Noble Education Initiative teams grow in Tennessee.

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

Financially, the sponsor has put forth a sound budget which reflects realistic goals and growth for the proposed school and network. The sponsor provided solid contingencies as the landscape of the network grows with expansion into a different county. The sponsor's budget as provided in the amended application is realistic and viable for the successful operation of the proposed school with no financial concerns to the stability of the currently approved campuses. I am confident that the financial plan of the sponsor meets state 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. The Commission also holds its schools to a high bar of accountability standards, and if not met, a school will receive corrective action in alignment with its established intervention policy. Since the sponsor already has a school open under the Commission, the sponsor is well aware of the expectation to demonstrate long-term, sustained academic growth and achievement to earn autonomy and renewal of any charter agreement.

For the reasons expounded on in this report, I recommend that the Commission approve the NCPHS 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 Nashville Collegiate Prep High School was contrary to the best interests of the students, the LEA, or community. Therefore, I recommend that the Commission approve the amended application for Nashville Collegiate Prep High School.

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: Nashville Collegiate Prep High School

Sponsor: ReThink Forward

Proposed Location of School: Metro Nashville Public Schools

Evaluation Team:

- Trent Carlson
- Halli Faulkner
- Beth Figueroa
- Mark Modrcin
- Hayden Pendergrass
- 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, and Portfolio Review and 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 identified school leader to address the concerns, weaknesses, and questions identified in the application, and to assess the capacity to execute the application’s overall plan.
3. **Consensus Judgment:** At the conclusion of the review of the application and the capacity interview, the committee submitted a final rubric and developed a consensus regarding a rating for each section of the application.

This recommendation report includes the following information:

1. Summary of the application: A brief description of the applicant’s proposed academic, operations, financial plans, and performance review.
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; 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.
  - 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: Nashville Collegiate Prep High School

Sponsor: ReThink Forward

Proposed Location of School: Metro Nashville Public Schools

Mission:<sup>1</sup> Nashville Collegiate Prep High School’s (NCPHS) mission is to provide a personalized, engaged, supported, and challenging environment that will strengthen students academically, socially, and emotionally. Students will leave NCPHS with the skills and mindset necessary to not only face reality but create improvements for the next generation, along with the skills necessary to succeed in college, the military, trade school, or the workplace.

Number of Schools Currently in Operation by Sponsor: The sponsor currently has one (1) operating charter school authorized by the Tennessee Public Charter School Commission (TPCSC). Additionally, the sponsor has one (1) charter school authorized by the TPCSC, scheduled to open in 2024.

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:
9	150	150	150	150	150	150
10	0	150	150	150	150	150
11	0	0	150	150	150	150
12	0	0	0	150	150	150
Totals	150	300	450	600	600	600

Brief Description of the Application:

The sponsor, ReThink Forward, is proposing to open a charter school in Davidson County, Tennessee and serve students in 9<sup>th</sup> through 12<sup>th</sup> grades when fully built out. The school, Nashville Collegiate Prep High School, is a new-start school and would be the third school for the sponsor. The proposed school will be organized under ReThink Forward and contract directly with Noble Education Initiative (NEI) as its charter management organization (CMO). The school intends to operate in the southeast Nashville community within Davidson County to “drive the school’s continued investment in this particular area of Nashville where we are currently serving elementary and middle school students at Nashville Collegiate Prep.”<sup>3</sup> The school proposes to offer personalized communities of learning for each grade-level and provide the students in southeast Nashville an additional school option.

The proposed school will be governed by ReThink Forward, who will contract with the charter management organization (CMO), Noble Education Initiative, to operate the school. In Year 0, NCPHS has budgeted receiving a \$300,000 line of credit and projects \$167,090 in expenses for the school. NCPHS projects the school will have \$2,547,142 in revenue and \$2,540,902 in expenses in Year 1, resulting in a fund balance of \$139,150. By Year 5, the school projects to have \$10,921,229 in revenue and \$8,493,670 in expenses, resulting in a positive ending fund balance of \$6,514,502.<sup>4</sup> The school anticipates that 32% of the student population will qualify as economically

<sup>1</sup> Amended Application, pg. 3

<sup>2</sup> Ibid, pg. 15-16

<sup>3</sup> Ibid, pg. 10

<sup>4</sup> Amended Budget



disadvantaged, 10% of the student population will be students with disabilities, and 30% of the student population will be English Learners.<sup>5</sup>

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<sup>5</sup> Amended Application, pg. 16



## Summary of the Evaluation

The review committee recommends approval of the amended application for Nashville Collegiate Prep High School because the applicant demonstrated a clear academic plan aligned to the mission and vision of the school, outlined a sound start-up plan, and provided a robust five (5)-year network plan that supports the opening of the proposed high school, fulfilling a complete K-12 academic option for families in southeast Nashville.

The academic plan presented by the applicant meets or exceeds the standard because the applicant detailed their experience of successfully operating a school with the proposed model and demonstrated how the plan was specifically tailored to meet the unique needs of the target community. Through both the application and the capacity interview, the applicant adequately addressed the plan to serve special populations of students. The applicant also discussed how the relatively large percentage of English Learners the proposed school projects to serve will be supported through the model. Additionally, during the capacity interview, the applicant described the ties the currently operating K-8 school has with the community and the demand they have seen, through both the families they currently serve and their partners, to open a high school and complete a K-12 educational pathway. The application also demonstrated the need for an additional high-quality public option in the area.

The applicant's operations plan meets or exceeds the standard because the proposed school will be supported by the ReThink Forward governing board and CMO, NEI, each of which demonstrated their capacity for supporting high-quality schools. The applicant outlined a sound, realistic start-up plan, which includes land that has already been secured for a facility, and the network and CMO successfully opened the currently operating K-8 school using largely the same plan. The professional development plan detailed in the application was also a strength and there is an experienced team at the CMO level dedicated to providing support for school-based staff.

The financial plan meets or exceeds the standard because the applicant provided a reasonable, flexible budget, has a history of strong financials at currently operating schools, and in the capacity interview was able to clearly explain contingency plans should anticipated funding not materialize as projected. Specifically, the applicant explained contingency plans regarding facility construction and clarified that the currently operating K-8 school is building a new facility that has the capacity to house a 9<sup>th</sup> grade class should the proposed high school be approved. This plan allows construction of the high school's facility to take place and open as the proposed school scales, while also not financially jeopardizing the currently operating school should the proposed high school not be approved.

Lastly, the Portfolio Review and Performance Record meets or exceeds the standard because the applicant team successfully operates a K-8 school that will serve as a feeder school for the proposed high school, has a history of strong operational and financial success, and in the capacity interview described their experiences operating high schools using similar models and curricula outlined in the application.

### 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>6</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:

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<sup>6</sup> Tennessee Charter School Application Evaluation Rubric – Ratings and Scoring Criteria

<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

## **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 because the application presents a high-quality academic model aligned with the mission that utilizes continuous improvement cycles to close achievement gaps for students. The application and capacity interview affirmed a clear plan and commitment for providing services to special populations of students. Finally, the applicant has presented a community-based model that is supported by community demand and the need for high-quality seats in this Nashville community such that enrollment targets are likely to be met.

The applicant has proposed a program that is tailored to this community based on their experience with their current K-8 school also located in the same area, and the instructional model and staffing plan is designed to address the unique needs of the community. The application outlines key academic strategies aligned with the mission of the school, including continuous improvement cycles, personalized learning plans, a collaborative learning model, and social-emotional skill-building. The applicant will use a curriculum that is data-driven, responsive to student needs, and has an assessment plan aligned to Tennessee Academic Standards. The academic goals included in the application are rigorous, measurable, realistic, and set high standards and expectations for student learning. The proposed school will also have clear processes for measuring their academic goals using NWEA MAP, TCAP assessments, monitoring student growth, and revising academic achievement goals within staff Professional Learning Communities.

The applicant also has a strong plan to meet the needs of students qualifying as special populations and at-risk students with clear school level and network level staffing support to implement the plans. In the application, there is a realistic plan for providing special populations of students with instructional programs, practices, and strategies that ensure access to the general education curriculum and academic success. There are also clear strategies for identifying and monitoring the progress of English Learners and students with disabilities. During the capacity interview, the current middle school leader, who will also be the proposed high school's leader, demonstrated a clear ability to oversee services for students with special needs and compliance for the high school. Nashville Collegiate Prep currently has a strong school culture that includes restorative discipline practices, which the applicant explained will continue in the proposed high school.

Additionally, the applicant has demonstrated strong ties within the proposed community. The existing school currently conducts monthly parent information sessions, and school staff has built trusting relationships within the community. The application indicates that a survey of current families showed that 90% are interested in enrolling in the proposed high school. While current families do not represent the entire student population the school intends to serve, a large percentage of the high school's enrollment would come from the K-8 school, as it intends to complete a K-12 educational pathway for families. The ability to meet enrollment targets was further strengthened by the operator's demonstrated ability to recruit students based on its existing K-8 school, which has a current enrollment of 616. The applicant's student recruitment and marketing plans for the proposed school will provide equal access to all interested students and families, including those experiencing poverty, academically low-achieving students, students with disabilities, and English Learners.

Within the application, the applicant demonstrated a compelling argument that there is a need for the proposed high school in this Nashville community. There are several lower performing high schools in the area, as measured by the Tennessee State Report Card. The applicant also noted that the intentionally small enrollment



structure of the proposed high school is in part designed to offer an alternative to these larger high schools. The applicant's proposed high school would be located on the same property as their new middle school campus, which will allow students to seamlessly transition from the middle school to the proposed high school and will help ensure that the school continually meets its annual enrollment targets.

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

*Rating: Meets or Exceeds Standard*

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

The applicant's Operations Plan Design and Capacity meets or exceeds the standard because the proposed school will be overseen by the ReThink Forward governing board and supported by NEI. The application also outlined a sound start-up plan and a strong professional development plan that will support teachers.

ReThink Forward, a Nashville-based governing board that currently operates the existing Nashville Collegiate Prep school, has a strong track record in the areas of operations and compliance. The ReThink Forward board is comprised of members with experience in education, operations, development, legal, fundraising, and community organizing. ReThink Forward has entered into an agreement with NEI, a nonprofit charter management organization, to provide educational management services. NEI brings decades of experience in school management, turnaround operations, innovative program design, and data-driven instruction. NEI will support the proposed school's back-office and human resource needs, and in several academic areas including selecting curriculum, supporting teachers in the instructional model, and providing professional development. NEI's strategic vision includes a five (5)-year network growth plan that involves hiring several new staff members who will support ReThink Forward in growing and scaling. The capacity interview provided an opportunity for the ReThink Forward governing board to respond to questions about the details of the management agreement that were identified during the initial review, including accountability structures. Concerns were successfully addressed by the applicant team and provided the review committee with a sufficient understanding about how ReThink Forward holds NEI accountable for their services.

The applicant provided a detailed and realistic timeline for opening the school that aligns with the proposed school budget and will put the school on track for a successful opening. A facility site has already been secured, and construction is in progress for a school building that will accommodate students in grades 5-9 in August 2024. The new school facility, which is scheduled to be ready for occupancy by July 2025, will be built for the proposed high school and will include traditional classrooms, space for extracurricular activities, and spaces with flexible layouts that will support the school's collaborative learning model. During the capacity interview, the applicant shared that they have secured all of the financing necessary to complete this new school building project.

The applicant also outlined a strong plan for professional development within the application. Professional development opportunities are scheduled prior to the start of school, during the school year, and on a weekly basis. Teachers will have the ability to identify areas of learning, and training will be differentiated based on the needs of the teacher. Professional development opportunities are aligned with the school's learning model and with the implementation of the NEI professional development model. Professional Learning Communities will provide teachers with structured opportunities to collaborate with other teachers on data, goal setting, lesson planning, problem solving, and technology integration. The applicant's professional development plan includes time for teachers to address the needs of special and diverse populations.

The applicant already operates a school within the Nashville area with a history of meeting compliance standards, and their application demonstrates a clear understanding of the operational needs and compliance requirements of a new charter school, including in the areas of insurance, personnel management, transportation, food services, and technology and data management. The applicant also has detailed safety and security plans for the proposed school and demonstrates an understanding of other school health and safety requirements. Thus, the applicant's experience successfully operating a school in Nashville will allow ReThink Forward to implement its plans to open this new school in the fall of 2024.

## **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 applicant provided reasonable, conservative budget assumptions, the school has demonstrated a strong financial position, and their financial contingency plan is both sound and flexible.

The budget provided within the application contains start-up and a five (5)-year operating budget that are complete, realistic, and viable based on the experience of the sponsor and the CMO. The cost assumptions used to calculate costs are reasonable, and the budget incorporates appropriate spending categories that would be expected for a school that is opening and expanding a grade band year over year. Additionally, the committee found that the proposed operating budget includes the appropriate expense assumptions to implement the academic model outlined within the application, all the while ensuring that the financial health and ending fund balance increase year over year.

The network's first school, Nashville Collegiate Prep, opened in fall 2021, and ReThink Forward's recent audit demonstrates a positive financial standing for the school and network. The network has contracted with NEI to provide financial management services and is responsible for providing monthly and quarterly financial reports to the board. During the capacity interview, the ReThink Forward board confirmed the CMO's regular reporting of the network's financial position through established procedures, which ensure that the board regularly reviews financial statements, including a balance sheet and statement of revenues and expenditures. The governing board exhibits a strong background in finance and coupled with the transparent and ongoing monitoring creates a solid foundation for the network as it expands and serves additional students.

During the capacity interview, the applicant provided further clarity regarding the school's contingency plans should enrollment not materialize at the projected amounts or expenses exceed projected amounts. The applicant's plan should enrollment not materialize is to extend its temporary incubation in phase 1 of the construction, which will also be used by the middle school. This would ensure that the high school is not burdened to cover the cost of an additional building that does not have the amount of students necessary to cover the cost of rent. While the committee initially had questions related to whether the budget included the proposed staffing model outlined within the application, the budget provides sufficient margins to account for unplanned or additional expenses that may become necessary based on the population of students the school enrolls. Additionally, the school has access to alternative funding sources through their management company and other partners, should a cash shortage or budget shortfall occur.



## **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 because the applicant successfully operates a K-8 school that will serve as a feeder school for the proposed high school, has a track record of operational and financial stability, and spoke to previous experience operating high schools in other states using similar strategies for the proposed school outlined in the application.

Nashville Collegiate Prep, the currently operating K-8 school that will serve as a feeder for the proposed high school, has been in operation since the 2021-2022 school year. During that time, both the board and the CMO have demonstrated their capacity to effectively operate through clean financial audits, meeting compliance standards for teacher licensing, as well as compliance standards for serving special populations of students. While in the first year of operation NCP did not meet the Year 1 success rate thresholds of the Commission's academic performance framework and therefore earned an overall does not meet rating, the school's academic performance was in line with, and in some cases above, the academic performance of Metro Nashville Public Schools, the resident district. Therefore, the school met standard on the comparative performance subsection of the academic performance framework and earned a TVAAS 3 in their first year of operation. Additionally, while details of how past performance indicated success were sparse within the application, during the capacity interview the applicant spoke to internal data from the 2022-2023 school year that indicates they are making strong academic progress, particularly with their English Learners and the students who arrived at their school in grades 3<sup>rd</sup>, 4<sup>th</sup>, and 5<sup>th</sup>. As shared in the capacity interview, data from the most recent school year showed that, in some cases, English Learners outperformed the general population, which the applicant pointed to as evidence to the efficacy of the personalized learning model.

Moreover, while the application also lacked detail regarding the CMO's past performance in schools it has operated in other states, information was shared during the capacity interview regarding the CMO's experience turning around high schools in Indiana. For example, the CMO took over multiple F-rated schools, immediately turned them into C-rated schools, and then continued improvement until the Indiana State Board of Education deemed them successful enough to want them back. The board spoke to this as being a primary reason NEI was selected as the CMO they would partner with to operate the proposed high school. NEI leadership explained how it has learned from past experiences operating high schools both locally and nationally and that recent additions to its staff further support a growing Tennessee-based network. Additionally, the proposed school leader, who was present in the capacity interview, has significant experience in leading successful charter schools, particularly high schools, and spoke to her experience founding public charter schools throughout her career. This experience will be a clear success for the proposed high school as it is getting started.



## Evaluation Team

**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.

**Halli Faulkner** is a seasoned education policy professional and a former middle school English teacher. Most recently, as the Senior Director of State and Federal Policy for the American Federation for Children, Halli supported education leaders in 18+ states in creating high-quality law and policies to empower students and families. Halli earned her law degree from the George Washington University Law School and master's degree in secondary education from Loyola Marymount University's Graduate School of Education.

**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 for the Riverside County Board of Education. 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.

**Mark Modrcin** currently serves as the Director of Growth and Governance for Vertex Education, which supports public charter schools in Arizona, Nevada and Texas that serve nearly 29,000 students. Previously, Mark served as the Director of Authorizing for the State Public Charter School Authority of Nevada, as well as a district authorizer in Tulsa, Oklahoma. Mark holds a Bachelor of Science degree in Business from Miami University, a MBA from the University of Tulsa, and is a 2015 alum of the National Association of Charter School Authorizers (NACSA) Leaders Program.

**Hayden Pendergrass** is the Director of External Affairs for the Tennessee Public Charter School Commission. He spent over 6 years as a research and policy advisor to former House Speaker Beth Harwell, advising her on public policy and staffing boards and commissions she served on. Following Speaker Harwell's retirement, he served as a legislative specialist with the Tennessee Comptroller of the Treasury, working with members of the General Assembly to pass legislation related to government finance, taxes, and regulatory matters. A native of Memphis, Hayden moved to Nashville in 2006 to attend Lipscomb University where he received his Bachelor's in Law, Justice, and Society with an emphasis in Law and Ethics.

**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.