



Executive Director’s Recommendation
Oxton Academy Charter 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 July 29, 2022, the sponsors of Oxton Academy Charter High School (“Oxton” or “sponsor”) appealed the denial of its amended application by the Clarksville Montgomery County School System (“CMCSS”) 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 Oxton amended application was not contrary to the best interests of the students, the LEA, or the community.¹ Therefore, I recommend that the Commission uphold the decision of Clarksville-Montgomery County School System Board of Education to deny the amended application for Oxton Academy Charter 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 Oxton Academy’s amended application. 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 (academic plan design and capacity, operations plan and capacity, financial plan and capacity, and, if applicable, past performance) . . . will be deemed not ready for approval.”² In addition, the Commission is required to hold a public hearing in the district where the proposed charter school seeks to locate.³

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

PROCEDURAL HISTORY

1. The sponsor submitted its initial application for Oxton Academy to CMCSS on January 28, 2022.
2. CMCSS assembled a review committee to review and score the Oxton Academy initial application.
3. On March 25, 2022, CMCSS’s review committee conducted a capacity interview with representatives of Oxton Academy.
4. CMCSS’s review committee reviewed and scored the Oxton Academy initial application and recommended to the CMCSS Board of Education that the initial application be denied, indicating the

¹ T.C.A. § 49-13-108.

² Tennessee Charter School Application Evaluation Rubric – Ratings and Scoring Criteria, pg. 1.

³ T.C.A. § 49-13-108.

⁴ Id.



initial application partially met standard for academics and did not meet standards in operations and finance.

5. On April 19, 2022, CMCSS Board of Education voted to deny the Oxton Academy initial application based on the review committee's recommendation.
6. The sponsor amended and resubmitted its application for Oxton Academy to CMCSS on May 24, 2022.
7. CMCSS's review committee reviewed and scored the Oxton Academy amended application based on the charter application scoring rubric.
8. CMCSS's review committee rated each section of Oxton Academy's amended application as meets standard and recommended approval to the local board of education.
9. On July 19, 2022, the CMCSS Board of Education voted to deny the amended application of Oxton Academy.
10. The sponsor appealed the denial of the Oxton Academy amended application in writing to the Commission on July 29, 2022, including submission of all required documents per Commission Policy 2.000.
11. The Commission's review committee independently analyzed and scored the Oxton Academy amended application using the Tennessee Department of Education's charter school application scoring rubric.
12. The Commission's review committee conducted a capacity interview with key members of the Oxton Academy leadership team on September 14, 2022 via Microsoft Teams.
13. On September 16, 2022, the Commission staff held a public hearing at the CMCSS Boardroom in Clarksville, Tennessee. At the public hearing, the Executive Director, sitting as the Commission's Designee, heard presentations from the sponsor and CMCSS and took public comment regarding the Oxton Academy amended application.
14. After the capacity interview, the Commission's review committee determined a final consensus rating of the Oxton Academy amended application, which served as the basis for the Review Committee Recommendation Report, attached hereto as **Exhibit A**.

FINDINGS OF FACT

District Denial of Initial Application

The review committee assembled by CMCSS to review and score the Oxton Academy initial application consisted of the following individuals:

Name	Titles
Carol Berry	CMCSS School Board Member
Norm Brumblay	CMCSS Chief Operations Officer
Mayor Jim Durrett	Mayor, Montgomery County
Rosalyn Evans	CMCSS Director of High Schools

Name	Titles
Taylia Griffith	CMCSS Director of Special Populations
David Holman	CMCSS Chief Technology Officer
Price Hopson	Community Representative
Angela Huff	CMCSS Interim Director of Schools
Sean Impeartrice	CMCSS Chief Academic Officer
Carol Joiner	CMCSS General Counsel
Anthony Johnson	CMCSS Chief Communications Officer
Jeanine Johnson	CMCSS Chief Human Resources Officer
Dayna Paine	CMCSS Career and Technical Education Director
Mayor Joe Pitts	Mayor, City of Clarksville
Chris Reneau	CMCSS Chief Financial Officer
Marla Rye	Community Representative
Emily Vaughn	CMCSS Director of Teaching, Learning, and Innovation
Elizabeth Vincent	CMCSS Director of Continuous Improvement
Vicki Wallace	Community Representative

The Oxton Academy initial application received the following ratings from the Clarksville-Montgomery County School System’s review committee:

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

After the CMCSS review committee completed its review and scoring of the initial application, its recommendation was presented to the CMCSS Board of Education on April 19, 2022. Based on the review committee's recommendation, the CMCSS Board of Education voted to deny the initial application of Oxton Academy.

District Denial of Amended Application

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

After the CMCSS review committee completed its review and scoring of the amended application, its recommendation was presented to the CMCSS Board of Education on July 19, 2022. At the July 19, 2022 board meeting, the CMCSS Board of Education voted to deny the amended application of Oxton Academy.

**Tennessee Public Charter School Commission Application Review Committee’s
Evaluation of the Application**

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

Name	Title
DreJean Cummings	Commission Staff
Trent Carlson	Commission Staff
Gomer Pascual	Commission Staff
Hillary Sims	External Reviewer
Melanie Rackley	External Reviewer

The review committee conducted an initial review and scoring of the Oxton Academy 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 Oxton Academy amended application was as follows:

Sections	Ratings
Academic Plan Design and Capacity	Does Not Meet Standard
Operations Plan and Capacity	Does Not Meet Standard
Financial Plan and Capacity	Does Not Meet Standard

The review committee has recommended denial of the application for Oxton Academy because the sponsor failed to provide sufficient evidence in the academic, operational, and financial sections to meet the required criteria of the rubric.



The review committee found that the sponsor’s academic plan does not meet standard, as it lacks evidence of clear demand, proper staffing to actualize the school’s mission and vision, clear processes for implementing services to special populations, and specific plans for meeting enrollment targets. The review committee noted the concept of Oxton Academy is riveting and commendable but indicated that while the community would benefit from an academy offering services like the proposed school, the applicant did not provide evidence of strong demand from parents or articulate the specific communities that they hope to serve. In addition, the applicant only provided two of the three letters of support required by the rubric. Further, the review committee stated the applicant’s plan is not aligned with state standards for student attendance and does not include the appropriate amount of licensed EL teachers required to work with identified EL students. Finally, the staffing plan lacks the proper number of qualified exceptional education teachers to ensure students with disabilities receive the full benefit of their individualized education programs (IEPs).

The review committee held that the sponsor’s operations plan does not meet standard due to concerns regarding the organizations involved with the school, a lack of clarity related to pre-opening responsibilities, and the establishment of vendor relationships. The review committee had outstanding questions regarding the relationships between One-on-One Children’s Services, EduSolve, the governing board, and the school. Additionally, the applicant was only able to acquire two letters of support, and without such support, partnerships, or MOUs, the review committee questioned the applicant’s ability to receive the necessary support for startup related activities. Furthermore, the review committee noted a lack of clarity regarding the responsibilities for the pre-opening process and the ownership across entities throughout the process.

Finally, the review committee found that the sponsor’s financial plan does not meet standard due to costs listed within the application, including staffing positions, cost assumptions, the Executive Director’s salary, and professional development, not accurately represented within the budget. The review committee stated the applicant’s budget reflects an imbalance of administrative and consulting costs versus resources needed to fulfill the school’s mission and vision, as well as a lack of staffing necessary to meet the needs of the projected student enrollment. The budget was also found to be absent of Tennessee aligned teacher compensation plans, which led to a lack of evidence that the financial plan was sound and reasonable.

For the aforementioned reasons, the review committee found that the sponsor did not meet or exceed the standard for approval based on the state’s scoring rubric.

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

Public Hearing

Pursuant to statute⁵ and Commission Policy 2.000, a public hearing chaired by the Executive Director was held on September 16, 2022. CMCSS’s presentation at the public hearing focused on the review process followed by the district and why the applicant was recommended for approval by the CMCSS review committee, but ultimately denied by the Board. CMCSS provided an overview of the review process for the Oxton Academy application and shared that they compiled a 19-member review committee that included members of the CMCSS executive cabinet, a CMCSS parent, community members, business leaders, and the city and county

⁵ T.C.A. § 49-13-108(5)(b)(i).



mayors. The review committee's initial review of the Oxton Academy application identified several deficiencies, including incorrect/unclear enrollment projections, concerns with facilities funding, and a lack of strong technology security, food services, and transportation plans. Additionally, the review committee cited concerns with the adequacy of insurance coverage, the lack of waivers for Human Capital plans, and concerns about the budget due to high variable costs and possible insolvency at Year 0. Upon reviewing the amended application, the review committee recommended approval based on Oxton Academy's sound academic plans, admirable mission and goals, along with significant improvements to the more concerning aspects of initial application, including the Human Capital, facilities and contingencies, and safety plan. CMCSS explained that though the review committee recommended the application for approval, the CMCSS Board of Education voted to deny the application in a 4-3 vote.

In the sponsor's opening statement, they shared that they have a unique design for students and parents who are seeking a different approach to learning and shared their desire to do so as a part of Clarksville-Montgomery County Schools System. Additionally, they shared that Oxton Academy would create a fluid learning environment, which would allow students to learn interesting and intellectually sound content that they may not otherwise get in a traditional setting, and that they have a culture of high expectations for all students. The sponsor shared how they plan to engage students by connecting them with career and technical education and making sure they have work-based learning (WBL) opportunities. The sponsor also shared that they have met with local community leaders and businesses who plan to assist and have aligned WBL opportunities. When addressing their plans for enrollment, the sponsor noted that projections are intentionally small to ensure that teachers can support and respond to students as needed. Regarding finances, the sponsor shared that they have received commitments for capital, which are above what they already provided in the amended application that was approved by the CMCSS review committee.

During questioning by the Commission, CMCSS answered questions about their process for assembling a review committee. CMCSS reiterated their process, stating that they work to have internal and external representation for their committees. CMCSS had two charter school applications this year, and they ensured the committee had expertise to review the different models. The Commission asked questions about remaining staffing concerns the review committee noted on the amended application when presenting the recommendation to the CMCSS Board of Education. CMCSS shared that the review committee did not find the Human Capital subsection of the amended application met the standard; however, the overall operations section did meet standard. The district also noted that this was an area they believed the applicant could address afterwards if they were approved by the Board, but the review committee shared remaining concerns in order to be transparent with the CMCSS Board. CMCSS also answered questions about remaining facilities concerns and shared that they considered the concerns to be addressed by the flexibility of the school's academic model, as well as their higher education partners who could assist with a temporary facility if needed. They also answered questions related to transportation and shared that given high school students can drive themselves if needed, and that the likelihood of students with an IEP needing transportation is low, the review committee felt the plan met the standard of the rubric. Finally, CMCSS shared that although they reviewed two charter school applications that had similar concerns within the initial applications, Oxton Academy made substantial changes to several sections of the application before submitting an amended application, and therefore, the district's review committee deemed the application to meet the standard.

The Commission then questioned the sponsor, beginning with questions about parent and community

demand. The sponsor stated that it is difficult to get parent and community support due to the reluctance of parents to show support for a different educational option within the district. The sponsor also noted that it is difficult to provide parents with a vision of the school without an approved application, and the sponsor planned to engage in more outreach once they were approved. The Commission questioned the sponsor about their proposed board, and the Oxton Academy team noted their intention of having representatives from Tennessee on the board, including a parent board member. The sponsor shared more details regarding facilities, as they have narrowed down to one facility in an ideal location for their purposes, but noted that it is not a facility described within the amended application. When asked about their chronic absenteeism goal, they shared that this is a struggle for schools all over the country, and that the small structure of their school would give them an opportunity to combat the issue by leveraging good relationships with students. The sponsor also shared that they would plan to be aggressive in their staffing plan and noted that they would use standard recruiting techniques, while also looking to recruit individuals from the military base to staff the school. When questioned about the relationship between the board and One-on-One Children's Services, they shared that One-on-One Children's Services is the non-profit that would be working with the school, and that One-on-One Learning is a linked for-profit that will not provide any services for the school. Finally, when addressing their waiver request for teacher evaluation, they noted that they are willing to make all accommodations to ensure the systems are aligned with Tennessee standards.

The public hearing concluded with closing statements by both parties and the receipt of zero in-person comments in support of CMCSS or Oxton Academy. The Commission also accepted written comments, and the Commission received one written comment writing in support of Oxton Academy.

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 and⁶," whether "approval of the application is in the best interests of the students, LEA, or community⁷." 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 Clarksville-Montgomery County School System, 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 Oxton Academy Charter High School amended application did not rise to the level of meeting or exceeding the standards required for approval. The review committee acknowledged the sponsor's clear mission and vision to bring a high school to an underserved community, and I share in the excitement of this vision for an at-risk student population to have a high-quality charter school option. However, I also share in the review committee's concerns with Oxton's lack of contingency plans for the academic model named in the application. The proposed academic plan is ambitious – with a combination of

⁶ T.C.A. § 49-13-108(5)(E).

⁷ *Id.*



blended learning, small group support, and work-based learning opportunities – however, I did not find sufficient evidence that the plan was comprehensive and reasonable to ensure successful implementation. Moreover, Oxton’s amended application does not demonstrate the ability to serve special populations and meet their enrollment targets, and there is little evidence to support that their plan is aligned to Tennessee state requirements, particularly regarding attendance and plans for EL teacher staffing. Additionally, the sponsor has not shown evidence of community demand for this school model, nor have they identified specific communities they wish to serve. While their testimony in the public hearing spoke to engaging with parents and sharing the vision for Oxton Academy, the amended application did not show evidence of sufficient parent demand that would translate to the enrollment projections of the school.

When reviewing the operations plan for Oxton, I am concerned that the sponsors fail to consider the expertise necessary for opening a new school in a new state. There is also a lack of clarity regarding the partnerships and/or relationships named throughout the application because there is no clear delineation of responsibilities. The sponsor was unable to provide evidence of the community support or industry partnerships as required by the State’s scoring rubric. There also remain questions as to the governance of the school. Oxton’s amended application shows a reliance on its connection and/or partnership with One-on-One Services, despite public hearing testimony that One-on-One Services would not provide any services to the school if approved and only served as the sponsor for the application. This inconsistency between the intended plan of the amended application and the testimony of public hearing does not give me enough confidence that the school would have sufficient leadership or direction for success. Further, the lack of defined industry partnerships is a much larger concern in this application, as the sponsor intends to utilize partnerships as a part of the student population’s academic plans and goals.

I am also in agreement with the review committee in that the sponsor’s application does not meet standard in the financial plan and capacity section. There is not the consistency within the amended application that would give me confidence in the sponsor’s capacity to execute on the proposed plan. The budget presented in the amended application leaves gaps in the school for staffing and does not support its plan for a facility. While I commend the sponsor’s testimony during the public hearing that there has been an arrangement of financial backing for the school, there is a lack of evidence within the application of the level of commitment to ensure the success of the school.

The charter application and appellate process are complex and detailed, rightfully so. The parties involved in an approved charter application enter into an agreement to provide a high-quality option to students in the selected district, with a significant amount of responsibilities tied to that. The deliberation on whether to enter into such an agreement should not be taken lightly. I appreciate the work of both the Clarksville-Montgomery County School System and the sponsors of the amended application for Oxton Academy Charter High School in undertaking the task. I believe the chief concern of both parties is to provide a viable high-quality option for students in the county. While I think the sponsor has identified a unique academic model that has the potential to benefit a population of students in need, I do not find sufficient evidence within the amended application and the public hearing to determine that the application meets the standard for approval and is ready to open successfully in Clarksville at this time. I believe the sponsor has received valuable feedback from both the local district and the Commission’s review committee that, if considered and implemented, could lead to a successful charter school option for the Clarksville-Montgomery County School System in the future.

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. At this time, the amended application for Oxton Academy Charter High School does not meet the bar for approval and, for the reasons expounded on in this report, I recommend that the Commission deny the Oxton Academy Charter High School amended application.

CONCLUSION

For these reasons, and for the reasons stated in the Review Committee Report attached hereto as **Exhibit A**, I do not believe that the decision to deny the amended application for Oxton Academy Charter High School was contrary to the best interests of the students, the LEA, or community. Therefore, I recommend that the Commission affirm the decision of the Clarksville-Montgomery County School System Board of Education to deny the amended application for Oxton Academy Charter High School.

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

Tess Stovall, Executive Director
Tennessee Public Charter School Commission

10/5/22
Date



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EXHIBIT A

Charter Application Review Committee Recommendation Report

October 5, 2022

School Name: Oxton Academy Charter High School

Sponsor: One on One Children's Services, Corp.

Proposed Location of School: Clarksville-Montgomery County School System

Evaluation Team: Name

- Trent Carlson
- DreJean Cummings
- Gomer Pascual
- Melanie Rackley
- 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 Charter Commission has adopted national and state quality authorizing standards to guide its work. As laid out in Charter Commission Policy 3.000 – Core Authorizing Principles, the Charter Commission is committed to implementing these authorizing standards that are aligned with the core principles of charter school authorizing, including setting high standards for the approval of charter schools in its portfolio.

In accordance with T.C.A. § 49-13-108, the Charter Commission adopted Charter Commission Policy 2.000 – Charter School Appeals. The Charter Commission has outlined the charter school appeal process to ensure the well-being and interests of students are the fundamental value informing all Charter Commission actions and decisions. The Charter Commission publishes clear timelines and expectations for applicants, engages highly competent teams of internal and external evaluators to review all applications, and maintains rigorous criteria for approval of a charter school. In addition, the Charter Commission plans to evaluate its work annually to ensure its alignment to national and state standards for quality authorizing and implements improvement when necessary.

The Charter Commission's charter application review process is outlined in T.C.A. § 49-13-108, Charter Commission Policy 2.000 – Charter School Appeals, and Charter Commission Policy 2.100 – Application Review. The Charter Commission assembled a charter application review committee comprised of highly qualified internal and external evaluators with relevant and diverse expertise to evaluate each application. The Charter Commission provided training to all review committee members to ensure consistent standards and fair treatment of all applications.

Overview of the Evaluation Process

The Tennessee Public Charter School Commission's charter application review committee developed this recommendation report based on three key stages of review:

1. Evaluation of the Proposal: The review committee independently reviewed the amended charter application, attachments, and budget submitted by the sponsor. After an independent review, the review committee collectively identified the main strengths, concerns, and weaknesses as well as developed specific questions for the applicant in the three sections of the application: Academic Plan Design and Capacity, Operations Plan and Capacity, and Financial Plan and Capacity.
2. Capacity Interview: Based on the independent and collective review of the application, the review committee conducted a 90-minute interview with the sponsor to address the concerns, weaknesses, and questions identified in the application, and to assess the capacity to execute the application's overall plan.
3. Consensus Judgment: At the conclusion of the review of the application and the capacity



interview, the committee submitted a final rubric and developed a consensus regarding a rating for each section of the application.

This recommendation report includes the following information:

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

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

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

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



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



Summary of the Application

School Name: Oxton Academy Charter High School

Sponsor: One on One Children’s Services, Corp.

Proposed Location of School: Clarksville-Montgomery County School System

Mission:¹ The mission of Oxton Academy is to serve those students who require academic success that is supported by innovations in curriculum; a different type of teaching supported by training and empowerment; and a safe and nonjudgmental physical environment.

Number of Schools Currently in Operation by Sponsor: There are no schools currently in operation by the sponsor.

Proposed Enrollment:²

Grade Level	Year 1: 2023-2024	Year 2: 2024-2025	Year 3: 2025-2026	Year 4: 2026-2027	Year 5: 2027-28	At Capacity:
9	30	33	37	41	45	50
10	30	33	37	41	45	50
11	60	66	73	80	88	97
12	80	88	97	107	127	140
Totals	200	220	244	269	305	337

Brief Description of the Application:

The sponsor, One on One Children’s Services, Corp. is proposing to open a charter school in Montgomery County, Tennessee and serve students in 9th through 12th grades. The school, Oxton Academy, is a new-start school and would be the first school for the sponsor. The school intends to operate in the 37040 ZIP code of Montgomery County to, “identify and reconnect disenfranchised and out-of-school youths, who would otherwise not achieve a high school diploma, through innovative instructional practices and learning opportunities especially designed for low-performing students.”³ The school proposes to offer a blend of career-centered and academic curriculum and provide additional school options for students in the Clarksville-Montgomery County School System.

The proposed school will be governed by “a small cohesive group of three, dedicated individuals with a focus on providing Oxton Academy’s targeted population with a unique and personalized educational opportunity.”⁴ The initial Board will be joined by two additional members – a representative from a local business/industry and another local individual with strong ties to the community – upon approval. In Year 0, Oxton Academy has budgeted to receive \$1,000,000 in a bank line of credit from Amerant Bank and projects

¹ Oxton Academy Amended Application, pg. 6

² Ibid, pg. 16

³ Ibid, pg. 6

⁴ Ibid, pg. 99



\$825,103 in expenses for the school.⁵ Oxton Academy projects the school will have \$1,800,000 in revenue and \$1,651,168 in expenses in Year 1, resulting in a balance of \$323,729⁶. By Year 5, the school projects to have \$2,635,380 in revenue and \$2,435,079 in expenses, resulting in a positive ending fund balance of \$1,368,906.⁷

The school anticipates that 70% 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.⁸

⁵ Ibid, Amended Budget, Pre-Opening Cash Flow

⁶ Ibid, Amended Budget, Year 1 Cash Flow

⁷ Ibid, Amended Budget, Year 2 Through 5 Budget

⁸ Ibid, pg. 16

Summary of the Evaluation

The review committee recommends denial of the application for Oxton Academy because the applicant failed to provide sufficient evidence in the academic, operational, and financial sections to demonstrate the application meets the required criteria of the rubric.

The academic plan presented by the applicant lacks evidence of clear and demonstrated parent and community demand, proper staffing to actualize the school's mission and vision and meet the need of all students enrolled, clear processes for implementing services to special populations, and specific plans for meeting enrollment targets. The concept of Oxton Academy is riveting and commendable, and while the review committee noted that the community would benefit from an academy offering services like the proposed school, the applicant did not provide evidence of strong demand from parents or articulate the specific communities that they hope to serve. In addition, they only provided two of the three letters of support required by the rubric. Further, the applicant's plan is not aligned with state standards for student attendance and does not include the appropriate amount of licensed EL teachers required to work with identified EL students. Finally, the staffing plan lacks the proper number of qualified exceptional education teachers to ensure students with disabilities receive the full benefit of their individualized education programs (IEPs).

The applicant's operations plan fails to meet standard due to concerns regarding the organizations involved with the school, a lack of clarity related to pre-opening responsibilities, and the establishment of vendor relationships. There is a lack of clarity regarding the relationships between One-on-One Children's Services, EduSolve, the governing board, and the school. The applicant was only able to acquire two of the three letters of support, and without such support, partnerships, or MOUs, the review committee questioned the applicant's ability to receive the necessary support for startup related activities. Additionally, there is a lack of clarity regarding the responsibilities for the pre-opening process and the ownership across entities throughout the process.

The financial plan does not meet standard due to costs listed within the application, including staffing positions, cost assumptions for food, the Executive Director's salary, and professional development, not accurately represented within the budget. The budget reflects an imbalance of administrative and consulting costs versus resources needed to fulfill the school's mission and vision, as well as a lack of staffing necessary to meet the needs of the projected student enrollment. The budget was also found to be absent of Tennessee aligned teacher compensation plans, including medical, retirement, and a competitive salary, which led to a lack of evidence that the financial plan was sound and reasonable.

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 approval⁹ 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:

⁹ Tennessee Charter School Application Rubric-Evaluation Ratings and Sample Scoring Criteria, pg. 1.



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PUBLIC CHARTER SCHOOL COMMISSION

Sections	Rating
Academic Plan Design and Capacity	Does Not Meet Standard
Operations Plan and Capacity	Does Not Meet Standard
Financial Plan and Capacity	Does Not Meet Standard

Analysis of the Academic Plan Design and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee

The applicant's Academic Plan Design and Capacity does not meet standard because of a lack of demonstrated parent and community demand, insufficient plans for special populations and staffing, and a lack of intentionality regarding recruitment and enrollment.

The applicant provides a unique and compelling mission for the school, with a stated interest in serving disenfranchised students and providing them with a means to receive a high school diploma and industry certification. Although this is a novel model for the Clarksville community, the applicant does not provide evidence of parent demand for the school, as required by the Tennessee Department of Education's rubric. The application notes two industry partners who have pledged support to the school, but those partnerships do not reflect parent interest. Additionally, the application lacks letters from several mentioned partners, and there are no MOUs or detailed explanations of the partnerships. During the capacity interview, the applicant explained that they have distributed 3,500 pieces of school promotional mail. However, they were unable to definitively state metrics used to identify parent interest nor were they able to name any of the communities from which potential students would be drawn.

The applicant's plan also lacks intentionality regarding the recruitment and enrollment of students and the outreach plan does not meet the rubric's requirement to "foster demand and community support." The school would rely on the school district to assist with identifying potential students, which does not demonstrate a comprehensive recruitment strategy, particularly if the district is not interested in or willing to partner with the school. Additionally, in the capacity interview, the applicant noted that they would rely heavily on word of mouth to help with recruitment efforts. The review committee did not find this answer to be sufficient, especially given that the out-of-state board members, who lack connections to Tennessee, would assist with recruitment. Finally, the amended application includes an outdated statute that would preference at-risk students, and the applicant could not articulate a plan to address recruitment without this policy.

The review committee also noted several concerns regarding the applicant's plans for special populations, specifically their staffing plans to meet required needs. In the interview, the sponsor stated that classes will not have whole-group instruction. Instead, a teacher will manage the full room and work individually with students for an eighty-five-minute block. The applicant was unable to provide evidence to demonstrate that this strategy is effective, or that it is an efficient practice to address IEP and ILP needs for students with disabilities and English learners, as required by the rubric. The applicant's special populations plan is also lacking the details necessary to assess its efficacy, which is critical given the percentage of student population that the school intends to serve. The applicant proposes a plan to have ILPs for students, however, the applicant does not include sufficient full-time equivalent positions (FTEs) to cover the creation of the ILPs for the expected enrolled students. Additionally, the narrative and budget reflect only a part-time Special Education Coordinator in year one and a part-time special education teacher through year four. The review committee lacked evidence to determine this is a viable plan or if it is sufficient to support students with IEPs, 504 plans, or students in need of other wrap-around services. With limited special populations staff and student support personnel (guidance counselors, EL teachers, and social workers), it is uncertain if staffing is sufficient to identify and adequately serve special populations. Additionally, the academic goals of the applicant are not aligned to Tennessee



requirements. For example, the application includes a chronic absenteeism rate of 80%, well below Tennessee Department of Education state accountability goals, and the projected graduation rate of 85% is lower than the Tennessee average from 2021.

Analysis of the Operations Plan and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee

The applicant's Operations Plan and Capacity does not meet standard because of an unrealistic startup plan and a lack of clarity regarding the governance and vendor relationships.

The applicant's sponsor, One-on-One Children's Services, plans to open the proposed charter school in the Clarksville area. While the sponsor has experience in education, it is unclear who on the proposed team has deep knowledge of Tennessee law and requirements and who has experience opening charter schools, a noted requirement on the scoring rubric. For example, the applicant requests to waive the State Board of Education's teacher evaluation policy should the school's proposed evaluation model, a teacher evaluation model for Florida charter school teachers, not be approved for use. However, the State Board of Education's teacher evaluation policy cannot be waived, and all teacher evaluation systems must be reviewed and approved by the State Board of Education. The applicant does not explain why the Florida model will help support student achievement or how it is aligned with the Tennessee standards for teacher evaluation and Tennessee academic standards. Given the inconsistencies and references to Florida in the amended application, it is unclear if the team who will be responsible for the school understands Tennessee requirements and will be able to execute the startup and operations plans in Tennessee.

In addition, the board members for the proposed school have little experience in education, which raises concerns about their ability to oversee the school. Relatedly, there were no board members present at the capacity interview. There were, however, several consultants, including EduSolve, present in the interview to answer questions about general school-level operations, although, at points the representatives for Oxton Academy were unable to clarify specifics about the plans for the proposed school. This lack of information and lack of clarity did not provide confidence that the proposed governing board and governance structure will effectively oversee the school's operations, as it is unclear who will be responsible for carrying out the operations for the school. It is also unclear what the relationship is between the two entities One-on-One Children's Services and One-on-One Learning, and this was further complicated by the plan for Oxton Academy to pay the Executive Director of One-on-One Children's Services a salary in year 0, without a plan for the services to be provided.

Additionally, the individuals responsible for executing the startup plan are not identified, and the plan included significant tasks that would be managed by an unnamed consultant, with a total cost upwards of \$90,000 for year 0. The tasks assigned to the consultant are critical to the pre-opening process, and it is not clear who the consultant is, or if the dollar amount is reasonable based on the depth or complexity of the tasks being assigned. In conclusion, there was a lack of evidence within the amended application and the capacity interview to ensure the school can effectively execute the proposed operations plan.

Analysis of the Financial Plan and Capacity

Rating: Does Not Meet Standard

Weaknesses Identified by the Committee:

The applicant's Financial Plan and Capacity does not meet standard because the budget does not sufficiently address staffing and includes budget assumptions that are unreasonable.

There are multiple iterations of a staffing organization chart within the application that list roles not represented within the budget, such as a school nurse, EL teacher, and coordinator. During the capacity interview, the applicant explained that they would plan to hire all necessary staff for the school but did not explain the inconsistencies between their budget and narrative. Additionally, there are several positions that are listed as 0.5 FTEs, and there is a lack of a clear plan to recruit and retain staff in this capacity, which is especially concerning given the credentials needed by the staff for the school model.

Additionally, there is a lack of clarity provided within the application regarding the services that the consultants included within the startup plan will provide and how these rates are reasonable based on the services. For example, the pre-opening budget includes the salary of the director for One-on-One Children's Services and EduSolve. However, the amended application does not articulate the roles and responsibilities for these two positions within the school, or what the ongoing relationship will be between the school, One-on-One Services, and EduSolve.

The applicant also includes a \$1 million line of credit from the bank that will be their primary source of funding in year 0. However, the letter within the application does not specify the total amount that the bank will be providing to the school upon approval of the charter school application. The lack of evidence of the available credit for the school does not provide information to determine if the projected revenue is sound or reasonable.

Overall, the amended application contains significant gaps in budget assumptions and does not provide evidence of the proposed school's ability to operate successfully.



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, in which he co-authored the American Federation for Children – Tennessee’s report, *The Warmth of Other Schools: Supporting Underrepresented Students in Private Schools*. 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.

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.

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.

Melanie Rackley currently serves as an Education Consultant for the Office of Charter Schools at the North Carolina Department of Public Instruction. She is the charter application team lead for the state authorizer's office. Prior to her current role, she worked in various human capital roles involving educator licensure, credentialing, and reciprocity. She holds a Bachelor of Arts degree from UNC-Chapel Hill and a Master of Public Administration degree from North Carolina Central University. She has experience working for the Ministry of Education in Liberia and the North Carolina Pre-Kindergarten program. She is committed to the global advancement of educational equity.

Hillary Sims has been a founding school leader of several Tennessee Charter Schools beginning shortly after the passing of Chapter 13. With a Bachelor of Sciences in both Psychology & Sociology from East Tennessee State University, a Master of Science in Holistic Teaching and Learning, and an Education Specialist Degree in Comprehensive and Modified, K-12 Special Education from the University of Tennessee, Knoxville. Ms. Sims has current licensure/certifications 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 for 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 second year with the TPCSC. Areas of expertise are Students with Disabilities, Adolescent Mental Health, Special Populations, Compliance, Holistic Learning Strategies, Discipline/Culture, and School Leadership. Ms. Sims currently serves as an Exceptional Education Coach for Metropolitan Nashville Public Schools.