
BEFORE THE TENNESSEE STATE BOARD OF EDUCATION

)
)
) **State Board of Education Meeting**
) **November 15, 2019**
)
)

IN RE:
Green Dot Charter K-8 School
Charter School Appeal

**FINDINGS AND RECOMMENDATION REPORT
OF THE EXECUTIVE DIRECTOR**

Pursuant to Tennessee Code Annotated (T.C.A.) § 49-13-108, sponsors proposing to open new charter schools may appeal the denial of their amended application by a local board of education to the State Board of Education (State Board). On September 27, 2019, Green Dot Charter K-8 School (Green Dot) appealed the denial of its amended application by Shelby County Schools (SCS) Board of Education to the State Board.

Based on the following procedural history, findings of fact, and Review Committee Report attached hereto, I believe that the decision to deny the Green Dot amended application was not “contrary to the best interests of the students, LEA, or community.”¹ Therefore, I recommend that the State Board affirm the decision of SCS to deny the amended application for Green Dot.

STANDARD OF REVIEW

Pursuant to T.C.A. § 49-13-108 and State Board policy 2.500, State Board staff and an independent charter application review committee (Review Committee) conducted a de novo, on the record review of the Green Dot 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 State Board is required to hold a public hearing in the district where the proposed charter school seeks to locate.³

¹ T.C.A. § 49-13-108.

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

³ T.C.A. § 49-13-108.

In order to overturn the decision of the local board of education, the State Board must find that the local board's decision to deny the charter application was contrary to the best interests of the students, LEA, or community.⁴ Because Green Dot is proposing to locate in a school district that contains a school on the current or last preceding priority school list, the State Board has the ability to approve the application, and thereby authorize the school, or to affirm the local board's decision to deny.

PROCEDURAL HISTORY

1. On January 30, 2019, the Sponsor, Green Dot Public Schools Tennessee (Sponsor), submitted a letter of intent to SCS expressing its intention to file a charter school application for Green Dot.
2. The Sponsor submitted its initial application for Green Dot to SCS on March 28, 2019.
3. Shelby County Schools asked all sponsors to complete a supplement to the Tennessee Department of Education charter school application template in Section 1.2 – Enrollment by responding to Shelby County Schools' 2019 Regional Seats Analysis. This supplement was turned in with the initial application.
4. On April 16, 2019, a SCS panel, which included external expert reviewers, held a capacity interview with the Sponsor.
5. SCS assembled a review committee to review and score the Green Dot Charter application. The review committee recommended denial of the Green Dot Charter initial application.
6. On June 25, 2019, the SCS Board of Education voted to deny the Green Dot initial application based upon the review committee's recommendation.
7. The Sponsor amended and resubmitted its application for Green Dot to SCS on July 26, 2019.
8. SCS' review committee reviewed and scored the Green Dot amended application and again recommended denial.
9. The Green Dot amended application was also recommended for denial based on a regional seat analysis conducted by SCS pursuant to SCS Board Policy #1011 – Charter Schools. The policy states, "the district shall consider whether the establishment of a proposed charter school in a particular geographic location of the LEA is feasible or will create oversaturation in the proposed geographic location."
10. On September 17, 2019, based on the SCS staff recommendation, the SCS Board of Education voted to deny the Green Dot amended application.

⁴ Ibid.

11. The Sponsor appealed the denial of the Green Dot amended application in writing to the State Board on September 27, 2019, including submission of all required documents per State Board policy 2.500.
12. At the time of appeal to the State Board, the Sponsor did not submit any corrections to the application as allowed under T.C.A. § 49-13-108(b)(4).
13. The State Board’s Review Committee analyzed and scored the Green Dot amended application using the Tennessee Department of Education’s charter application scoring rubric.
14. The State Board’s Review Committee conducted a capacity interview with the proposed governing board of Green Dot and key members of the leadership team on October 29, 2019 in Nashville.
15. On November 4, 2019, the State Board staff held a public hearing in Memphis. At the public hearing, the Executive Director, sitting as the State Board’s designee, heard presentations from the Sponsor and SCS and took public comment regarding the Green Dot application.
16. After the capacity interview, the Review Committee determined a final consensus rating of the Green Dot amended application, which served as the basis for the Review Committee Recommendation Report.

FINDINGS OF FACT

- **District Denial of Application.**

SCS assembled a review committee assembled to review and score the Green Dot initial and amended applications. The Green Dot initial application received the following ratings from the SCS review committee:

Sections	Rating
Academic Plan Design and Capacity	PARTIALLY MEETS STANDARD
Operations Plan and Capacity	PARTIALLY MEETS STANDARD
Financial Plan and Capacity	PARTIALLY MEETS STANDARD
Portfolio Review/Performance Record	DOES NOT MEET STANDARD

After the SCS review committee completed its review and scoring of the initial application, its recommendation was presented to the SCS Board of Education on June 25, 2019. Based on the review committee’s recommendation, the SCS Board of Education voted to deny the initial application of Green Dot Charter.

Upon resubmission, the amended application received the following ratings from the SCS review committee:⁵

⁵ Please see **Exhibit B** for a copy of the SCS review committee report.

Sections	Rating
Academic Plan Design and Capacity	PARTIALLY MEETS STANDARD
Operations Plan and Capacity	PARTIALLY MEETS STANDARD
Financial Plan and Capacity	PARTIALLY MEETS STANDARD
Portfolio Review/Performance Record	PARTIALLY MEETS STANDARD

After the SCS review committee completed its review and scoring of the amended application, its recommendation was presented to the SCS Board of Education on September 17, 2019. Based on this recommendation and SCS Policy #1011 – Charter Schools, the SCS Board of Education voted to deny the amended application of Green Dot.

- **State Board Charter Application Review Committee’s Evaluation of the Application**

Following the denial of the Green Dot amended application and their subsequent appeal to the State Board, State Board staff assembled a diverse Review Committee of experts to evaluate and score the Green Dot amended application. This Review Committee consisted of the following individuals:

Name	Title
Binh Doan	Director of Operations, Aurora Collegiate, Memphis, TN
Ali Gaffey	Deputy Director of Charter Schools, State Board of Education, Nashville, TN
Mark Modrcin	Director of Authorizing, Nevada State Public Charter School Authority, Las Vegas, NV
Stephanie Rizas	Classroom Teacher and Instructional Coach, Montgomery County, MD
Earl Simms	Charter School Authorizing Consultant, St. Louis, MO
Robert Wallace	Director of Operations, KIPP Antioch College Prep Elementary, Nashville, TN

The Review Committee conducted an initial review and scoring of the Green Dot 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 Green Dot amended application was as follows:

Sections	Rating
Academic Plan Design and Capacity	PARTIALLY MEETS STANDARD
Operations Plan and Capacity	MEETS THE STANDARD
Financial Plan and Capacity	MEETS THE STANDARD
Portfolio Review/Performance Record	PARTIALLY MEETS STANDARD

The Review Committee recommended that the application for Green Dot be denied because the applicant failed to provide sufficient evidence in the academic and portfolio review sections to demonstrate the application meets the required criteria of the rubric.

The academic plan included a clear mission, vision, and goals as well as a compelling rationale for selecting its proposed community. However, the applicant failed to provide sufficient evidence of a remediation support plan appropriate for elementary age students and did not provide a compelling student outreach plan with pledged community support.

The operations plan presented by the applicant was a strength of the application, with clear roles and responsibilities for its governing board and leadership, viable options for a permanent facility, and evidence of a strong regional support team with effective systems for recruiting and developing staff for a new school.

Additionally, the applicant's financial plan provided the review committee confidence in the Sponsor's ability to financially support the school. The proposed budget was reasonable, grounded in experience, and relied heavily on state and local funding sources to cover the cost of the school. Furthermore, the financial plan provided evidence that the regional network is in strong fiscal health, and sufficient contingency plans, including a pledge of financial support from the national network, should its expenses exceed revenue.

Finally, the portfolio review/performance record presented by the applicant demonstrated a focus on improving academic achievement across all of its five (5) Tennessee schools but did not provide compelling evidence of successful student outcomes in terms of overall proficiency or growth. Four (4) of the network's five (5) existing Tennessee schools are consistently performing well below state standards with one of its schools appearing on the state's 2019 Priority School List. For these reasons, the review committee lacked clear and compelling evidence to recommend approval of an additional school for the network.

In summary, the Review Committee determined that the Sponsor did not provide sufficient evidence in the academic and performance sections of the Green Dot application to meet the required rubric ratings for approval. The capacity interview with the Sponsor did not provide further clarification that would have resulted in a higher rating. Therefore, the Review Committee recommended that the Green Dot application be denied.

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

- **Public Hearing**

Pursuant to statute⁶ and State Board policy 2.500, a public hearing chaired by the Executive Director was held in Memphis on November 4, 2019. SCS's presentation at the public hearing focused on the argument that the denial of the Green Dot amended application was in the best interest of the students, LEA, and community. SCS grounded its argument in the deficiencies found by the SCS review committee in the amended application after conducting a review process aligned to the State Board Quality Authorizing Standards and National Association of Charter School Authorizers (NACSA) best practices. Specifically, SCS found the Green Dot amended application did not meet the standard in the

⁶ T.C.A. § 49-13-108(b)(4).

academic plan because it did not include a compelling enrollment strategy in an area of Memphis deemed oversaturated by SCS. In the operations section, SCS found that the application appeared to be written specifically for the State Board, rather than SCS, and did not elaborate on how the network would function with a third authorizer. In the financial section, SCS cited deficiencies in the budget assumptions and a lack of contingency plan if the enrollment projections did not meet expectations. When analyzing the performance of Green Dot's five (5) schools in Memphis, SCS stated that, while the district was encouraged to see high levels of growth across some of the network schools, this growth was not consistent across multiple years, and the academic proficiency levels remain low across the Green Dot schools. SCS stated the performance of the current Green Dot schools did not merit replication at this time.

In addition to deficiencies noted in the amended application, SCS grounded its denial in SCS Board Policy #1011 – Charter Schools, which requires applicants to demonstrate a community need by addressing one of three options: academic underperformance of area schools, over enrollment of schools in an area, or new programmatic options. SCS stated that all charter school applicants were required to complete a supplement to the charter school application where sponsors were asked to address how the proposed school met community needs. As a part of its rationale for denial of the Green Dot amended application, SCS stated that 32% of the charter schools (18 of 56) in Memphis are at least 30% below the enrollment capacities listed in their applications, and the SCS 2019 regional seat analysis was an additional tool to analyze the best interests of the community. Using its regional seats analysis, SCS stated that the applicant did not meet any of the three criteria as there are over 1000 unfilled seats, both in traditional public schools and charter schools, in the Whitehaven region of the city. Because of the oversaturation in the Whitehaven area, the intended location of the school, SCS stated that Green Dot could not demonstrate a community need, and therefore, the lack of community need was one of the reasons the application was denied. When asked if the SCS Board of Education was aware of the State Board rule 0520-14-01-.01 that prohibits districts from denying charter school applications for failure to address additional priorities, SCS stated the Board was aware of this rule. However, SCS stated that the Board hoped the State Board would consider oversaturation as a “lens through which the [district’s] charter review team reads Section 1.2 – Enrollment.” SCS further stated, “the application of the Board Policy #1011 through the use of the regional seats analysis guided the review of the applicant’s rationale and the community’s need.”

In response to the SCS argument, the Sponsor highlighted their work in the community of Whitehaven where the Sponsor has operated for the past five (5) years. Based on this work, the Sponsor cited the fact that 90% of the students at Fairley High School and Hillcrest High School, two schools operated by the Sponsor in Whitehaven, enter the schools more than two (2) grade levels behind in reading and math. Moreover, the Sponsor cited the 2019 SCS Regional Seat Analysis, which stated that there was a need for an additional 3,987 elementary and 2,010 middle school high quality seats in the Whitehaven area. Additionally, the Sponsor stated that they had heard from Whitehaven parents and community members about the need for additional high quality elementary and middle school options. When sharing performance data about their current operating schools, the Sponsor stated that MAP and iReady data show their students are making significant academic gains once they are in a Green Dot school. Furthermore, the Sponsor highlighted the improvements that they have made to the culture in

the schools they operate, particularly in their decreased suspension rates. The Sponsor also noted that they plan to incubate the school in one of its current facilities and have several options in the area for a long-term facility location. Finally, the Sponsor highlighted their post-approval communications plan, which includes postcard mailers, outreach to community partners, and networking at local daycares.

A portion of the public hearing was dedicated to taking public comment. A total of ten (10) people made verbal comments in support of Green Dot at the hearing. In addition, the State Board received written public comment from one (1) individual in support of the district's decision to deny the Green Dot application.

- **Alignment of Shelby County Schools' Application Process to State Board Quality Authorizing Standards**

State Board staff collected and analyzed detailed information regarding SCS's application review process to determine alignment with State Board Quality Authorizing Standards as set forth in State Board policy 6.111. At the public hearing, State Board staff questioned SCS regarding its authorization process and alignment to the Quality Authorizing Standards. SCS articulated that its application process is fair, transparent, and focused on quality with rigorous criteria for approval. As evidence of this, SCS pointed to their use of the State Charter Application, the formation of a review committee made up of both internal and external experts trained on the process to evaluate each application, and hosting a capacity interview with every applicant to ensure a fair review. Additionally, SCS highlighted their use of informational sessions for applicants as a means to increase transparency in their process. Based on the information presented by SCS, this part of the district's process appears in alignment with State Board Quality Authorizing Standards.

However, SCS stated that the SCS Board of Education was aware of the State Board's rule prohibiting the denial of applications for failure to address a district's additional priorities, but the Board proceeded with the denial of the Green Dot amended application, in part, because of failing to address the additional priority. This decision making process does not align with the Quality Authorizing Standard that states, "a quality authorizer makes authorizer decisions that will result in positive student outcomes, in accordance with state law."

ANALYSIS

State law requires the State Board to review the decision of the local board of education and determine whether the denial of the proposed charter school was in the "best interest of the students, LEA, or community."⁷ In addition, pursuant to T.C.A. § 49-13-108, the State Board adopted Quality Charter Authorizing Standards set forth in State Board policy 6.111, and utilizes these standards to review charter applications received upon appeal. One such standard is to maintain high but attainable standards for approving charter applications. In making my recommendation to the Board, I have considered the Review Committee Report, the documentation submitted by both the Sponsor and SCS, the arguments made by

⁷ T.C.A. § 49-13-108.

both the Sponsor and SCS at the public hearing, and the public comments received by State Board staff and conclude as follows:

The Review Committee's report and recommendations are thorough and cite specific examples in the application and reference information gained at the capacity interview in support of its findings. For the reasons explicated in the report, I agree that the Green Dot amended application did not rise to the level of meeting or exceeding the standards required for approval.

Pursuant to State Board Rule 0520-14-01-.01 Approval of a Charter School, a local board of education may ask sponsors to address additional priorities as a means of evaluating the best interest of the students, LEA, or community. However, "chartering authorities may not deny or refuse to review an application for failing to address additional priorities." At the public hearing, SCS officials acknowledged that applicants were asked to complete a supplement to the state's application in Section 1.2 – Enrollment to demonstrate community need, per SCS Board Policy #1011 – Charter Schools. Furthermore, SCS confirmed that the application was recommended for denial, in part, because it did not meet the additional SCS regional seat analysis priority contained in SCS Board Policy #1011 – Charter Schools. While the regional seat analysis was not the only reason SCS denied the Green Dot amended application, pursuant to State Board rules, it should not have been used as a reason for denial.

Given the great responsibility of educating students and the amount of public funds entrusted to a charter school that is approved by a local district, the State Board 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. It is readily apparent that the Sponsor has assembled a highly capable board and staff with a passion for students and dedication to the communities they currently serve. Moreover, the Sponsor has been a strong partner with the State Board, the authorizer for its Bluff City High School, and I have enjoyed working with the network to serve the students in Memphis. However, I also weigh with great responsibility the decision whether to recommend the opening of the Sponsor's sixth school in the Memphis area, and, in making that decision, I must consider the network's capacity and readiness to open an additional school. I agree with the Review Committee's assessment that there was a lack of concrete evidence regarding the network's readiness to open an elementary school, particularly because this would be the first elementary school for the Green Dot network. Although I believe that the Green Dot team is capable of taking on the varied challenges that come with serving a new student population, I also recognize the level of focus, detailed planning, and capacity it would take to serve these students well. At this time, I do not find clear and compelling evidence in the Sponsor's academic plan such that I believe it would result in high student outcomes in the first few years of operations. Moreover, while the Sponsor has deep community involvement in its middle and high schools, its community outreach with regard to serving elementary-age students is underdeveloped. While I understand that the Sponsor has been operating in the Whitehaven area for five (5) years, that in and of itself is not sufficient to ensure high community engagement and that enrollment projections will be met in this new school.

Furthermore, while I applaud the Sponsor's success on the MAP and iReady assessments as well as its Level 5 TVAAS growth at Bluff City High School in 2018 and 2019, I also recognize that the Sponsor has struggled with its student academic performance in its middle schools and high schools over the past several years. The transformation work that the Sponsor has undertaken at its four (4) schools within the

Achievement School District (ASD) is challenging work, and I recognize that students often enter the Sponsor's schools performing several years behind grade level. However, those students are also the ones that deserve the most attention, and I am concerned with the inconsistent levels of growth shown over the last few years at the Sponsor's ASD schools as well as the low levels of academic proficiency across the portfolio. To meet or exceed the standard on the state's scoring rubric in past performance, a Sponsor must provide clear and compelling evidence of successful student outcomes for the totality of the network. I concur with the Review Committee's academic performance concerns surrounding the current schools in the Sponsor's portfolio. While I appreciate the Sponsor's strategies to date to improve the academic proficiency and growth across all of their schools, the Sponsor has not yet provided adequate evidence that their academic program has a high likelihood of success such that it merits replicating with additional middle grade students and/or expanding to a new population of early grade students.

Lastly, I do believe that the Sponsor has identified a clear need within the Whitehaven community for more high quality school options at the elementary and middle school levels. The Sponsor cited the additional 3,987 elementary and 2,010 middle school high quality seats identified through the SCS 2019 Regional Seat Analysis as clear evidence that there is a need in the Whitehaven community for additional high quality options. However, this need does not outweigh the importance that the school be ready to open strong on day one and achieve high academic outcomes for all students. Therefore, because of the uncertainty of the network capacity to open a sixth school as well as concerns regarding past performance, I cannot recommend that the State Board approve the Sponsor's application for an additional school. I have confidence that the Sponsor is capable of realizing additional improvements at its current schools, and I will be eager to continue our work with the Sponsor in the coming years. However, at this time I agree with SCS and the SBE Review Committee that concerns remain about the ability of the Sponsor to successfully open and operate the proposed school in a manner that will improve academic outcomes for their target population.

CONCLUSION

For these reasons, and for the reasons stated in the Review Committee Report attached hereto, I do not believe that the decision to deny the amended application for Green Dot Charter K-8 School was contrary to the best interests of the students, the LEA, or the community. Therefore, I recommend that the State Board affirm the decision of SCS to deny the amended application for Green Dot Charter K-8 School.



Dr. Sara Morrison, Executive Director
State Board of Education

11/12/2019

Date



EXHIBIT A

Charter Application Review Committee Recommendation Report

November 8, 2019

School Name: Green Dot Charter K-8 School

Sponsor: Green Dot Public Schools Tennessee

Proposed Location of School: Shelby County Schools

Evaluation Team:

Binh Doan
Ali Gaffey
Mark Modrcin
Stephanie Rizas
Earl Simms
Robert Wallace

This recommendation report is based on a template from the National Association of Charter School Authorizers.



© 2014 National Association of Charter School Authorizers (NACSA)

This document carries a Creative Commons license, which permits noncommercial re-use of content when proper attribution is provided. This means you are free to copy, display and distribute this work, or include content from the application in derivative works, under the following conditions:

Attribution You must clearly attribute the work to the National Association of Charter School Authorizers, and provide a link back to the publication at <http://www.qualitycharters.org/>.

Noncommercial You may not use this work for commercial purposes, including but not limited to any type of work for hire, without explicit prior permission from NACSA.

Share Alike If you alter, transform, or build upon this work, you may distribute the resulting work only under a license identical to this one.

For the full legal code of this Creative Commons license, please visit www.creativecommons.org. If you have any questions about citing or reusing NACSA content, please contact us



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 State Board of Education. In accordance with T.C.A. § 49-13-108, the State Board of Education shall conduct a de novo, on the record review of the proposed charter school's application, and the State Board of Education has adopted national and state authorizing standards. As laid out in State Board policy 6.200 - Core Authorizing Principles, the State Board 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 State Board adopted State Board policy 6.111 - Quality Charter Authorizing Standards. The State Board has aligned the charter school appeal process to these high standards to ensure the well-being and interests of students are the fundamental value informing all State Board actions and decisions. The State Board 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. Annually, the State Board evaluates its work to ensure its alignment to national and state standards for quality authorizing and implements improvement when necessary.

The State Board of Education's charter application review process is outlined in T.C.A. § 49-13-108, State Board policy 2.500 – Charter School Appeals, and State Board policy 6.300 – Application Review. The State Board assembled a charter application review committee comprised of highly qualified internal and external evaluators with relevant and diverse expertise to evaluate each application. The State Board provided training to all review committee members to ensure consistent standards and fair treatment of all applications.

Overview of the Evaluation Process

The State Board of Education'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 four sections of the application: Academic Plan Design and Capacity, Operations Plan and Capacity, 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 in-person interview with the sponsor, members of the proposed governing board, and identified school leader (if applicable) 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 plans, operations plans, financial plans, and performance record.
2. Summary of the recommendation: A brief summary of the overall recommendation for the application.
3. Analysis of each section of the application: An analysis of the four sections of the application and the capacity of the team to execute the plan as described in the application.
 - a. Academic Plan Design and Capacity: school mission and goals; enrollment summary; school development; academic focus and plan; academic performance standards; assessments; school calendar and schedule; special populations and at-risk students; school culture and discipline; marketing, recruitment, and enrollment; community involvement and parent engagement; existing academic plan; performance management; 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; network vision and growth plan; network management; network governance; network personnel/human capital; staffing management and evaluation; and the capacity to implement the proposed plan.
 - c. Financial Plan and Capacity: budget narrative; budgets of network and school; cash flow projections; related assumptions; financial policies and procedures; and the capacity to implement the proposed plan.
 - d. Portfolio Review and Performance Record: evidence of successful student outcomes in network; evidence that schools within network are high-performing; detailed narrative of high-performing and low-performing schools; latest audit presented without findings; and organization in good standing with authorizers.

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

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

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

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



Summary of the Application

School Name: Green Dot Charter K-8 School

Sponsor: Green Dot Public Schools Tennessee

Proposed Location of School: Shelby County Schools

Mission:¹ The mission of the proposed school will be to provide the foundation that prepares ALL students for success in high school and subsequently for college, leadership, and life using a rigorous standards-aligned education program within a tight-knit school community where all stakeholders actively engage in the education process.

Number of Schools Currently in Operation by Green Dot Public Schools (Nationally):

Memphis: Five (5)—Fairley High School, Hillcrest High School, Bluff City High School, Wooddale Middle School, and Kirby Middle School

California: Twenty (20) schools

Washington: Two (2) schools

Proposed Enrollment:²

Grade Level	Year 1 (2020)	Year 2 (2021)	Year 3 (2022)	Year 4 (2023)	Year 5 (2024)	At Capacity (2025)
K	120	120	120	120	120	120
1	--	120	120	120	120	120
2	--	--	120	120	120	120
3	--	--	--	120	120	120
4	--	--	--	--	120	120
5	--	--	--	--	--	120
6	180	180	180	180	180	180
7	--	180	180	180	180	180
8	--	--	180	180	180	180
Total	300	600	900	1020	1140	1260

Brief Description of the Application:

The sponsor, Green Dot Public Schools Tennessee (GDPST), is proposing to open a combined elementary and middle school in the Whitehaven community of Memphis, Tennessee,³ serving students in grades K through 8th. The school, Green Dot Charter K-8 School (Green Dot K-8), is a new-start school and would be their sixth school in Tennessee. Green Dot K-8 will open in 2020 with students in grades K and 6th and will provide a “rigorous standards-aligned education program with a tight knit school

¹ Green Dot Charter K-8 School application, pg. 3.

² Ibid., pg. 7-8.

³ Ibid., pg. 1.



community”⁴. The school will “serve elementary school age students in order to truly fulfill its mission of getting students college-ready”⁵ and create a pipeline of students prepared to enter one of GDPST’s high schools in the Whitehaven community.

The proposed school will be organized under the existing charter management organization, GDPST, and the current Board of Directors will govern the new school. GDPST has budgeted \$241,310 in revenue and projects \$241,310 in expenses for the school in Year 0. GDPST projects the school will have \$3,401,568 in revenue and \$3,477,161 in expenses in Year 1, resulting in a net loss of \$75,593. By Year 5, the school projects to have \$12,051,447 in revenue and \$11,612,152 in expenses, resulting in a positive ending fund balance of \$375,062. The school anticipates that 100% of the student population will qualify as economically disadvantaged, 11% of the student population will be students with disabilities, and 3% of the student population will be English Learners.⁶

⁴ Ibid., pg. 3.

⁵ Ibid. pg. 3.

⁶ Ibid. pg. 8.

Summary of the Evaluation

The review committee recommends denial of the application for Green Dot K-8 because the applicant failed to provide sufficient evidence in the academic and portfolio review sections to demonstrate the application meets the required criteria of the rubric.

The academic plan included a clear mission, vision, and goals, as well as a compelling rationale for selecting its proposed community. However, the applicant failed to provide sufficient evidence of a remediation support plan appropriate for elementary age students and did not provide a compelling student outreach plan with pledged community support.

The operations plan presented by the applicant was a strength of the application, with clear roles and responsibilities for its governing board and leadership, viable options for a permanent facility, and evidence of a strong regional support team with effective systems for recruiting and developing staff for a new school.

Additionally, the applicant’s financial plan provided the review committee confidence in GDPST’s ability to financially support the school. The proposed budget was reasonable, grounded in experience, and relied heavily on state and local funding sources to cover the cost of the school. Furthermore, the financial plan provided evidence that the regional network is in strong fiscal health and contingency plans, including a pledge of financial support from the national network, should its expenses exceed revenue.

Finally, the portfolio review/performance record presented by the applicant demonstrated a focus on improving academic achievement across all of its five (5) Tennessee schools but did not provide compelling evidence of successful student outcomes in terms of overall proficiency or growth. Four (4) of the network’s five (5) existing Tennessee schools are consistently performing well below state standards with one of its schools appearing on the state’s 2019 Priority School List. For these reasons, the review committee lacked clear and compelling evidence to recommend approval of an additional school for the network.

Summary of Section Ratings

In accordance with the Tennessee Department of Education’s charter application scoring rubric, “applications that do not meet or exceed standard in every area . . . will be deemed not ready for approval,”⁷ and strengths in one area of the application do not negate material weaknesses in other areas. Opening and maintaining a successful, high-performing charter school depends on having a complete, coherent plan and identifying highly capable individuals to execute that plan. The review committee’s consensus ratings for each section of the application are as follows:

Sections	Rating
Academic Plan Design and Capacity	Partially Meets Standard
Operations Plan and Capacity	Meets or Exceeds Standard
Financial Plan and Capacity	Meets or Exceeds Standard
Portfolio Review/Performance Record	Partially Meets Standard

⁷ Tennessee Charter School Application – Ratings and Scoring Criteria, pg. 1.

Analysis of the Academic Plan Design and Capacity

Rating: Partially Meets Standard

Weaknesses Identified by the Committee:

The applicant's Academic Plan Design and Capacity partially meets standard because it lacked evidence of a remediation support plan appropriate for elementary age students and did not provide a compelling student outreach plan with pledged community support. This is the first elementary school for the national Green Dot Public Schools network and, while the applicant articulated a compelling mission and vision, measurable goals, and a clear plan for providing significant wrap-around services for students and families, the review committee was unable to affirm the applicant's academic preparedness for opening its first K-8 school in August 2020.

According to the rubric, an applicant must provide sufficient evidence that the "proposed academic plan will be appropriate and effective for growing all students"⁸. Within the application, the applicant included a detailed RTI² process for identifying students in need of intervention and a 20-week cycle for analyzing data and adjusting supports. During the capacity interview, when asked about this significant amount of time to complete an RTI² cycle, the applicant explained that this mirrors the model at their existing middle and high schools, but did not provide evidence that the chosen approach will result in improved academic achievement for elementary students. Additionally, when the review committee probed for additional details regarding how the school's intervention strategies for serving at-risk students differed from its current middle and high schools, the applicant explained that the students would be similar, but with smaller achievement gaps. Given that this is the first elementary school for the network, the review committee expected to hear additional details about a concrete set of intervention strategies specifically tailored to elementary age students and data that supports the selection of these strategies. Moreover, there was a lack of compelling evidence indicating a clear understanding of how the intervention needs of elementary students will differ from its middle and high school students and how the network was preparing to meet those needs. As a result, the review committee found insufficient evidence that the school's RTI² process was appropriate for elementary age students and determined that the lack of identified intervention strategies and extended intervention review cycle did not amount to an effective plan for growing all students at the elementary grade span.

A second weakness of the applicant's academic plan design and capacity was the lack of a clear and "compelling student outreach plan [. . .] that is realistic"⁹. GDPST currently operates five (5) schools in Memphis, two (2) of which are located in the proposed community for the new K-8 school. As part of its marketing, recruitment, and enrollment planning, the applicant described how its high schools are known within the community and that GDPST has developed partnerships with community organizations within the neighborhood in support of its existing high schools. While these are clear strengths for the applicant, it remains unclear how these high school partnerships and presence would translate to an effective recruitment and enrollment plan for the new school, particularly at the elementary level. The application did not include any letters of support, MOUs, contracts, or evidence of community partners serving elementary or Pre-K age students. As discussed further during the capacity interview, the applicant informally gathered interest among families at its current schools, but it remains unclear if this interest

⁸ Tennessee Charter School Application – Ratings and Scoring Criteria, Section 1.3 Academic Focus and Plan.

⁹ Ibid. Section 1.11 Marketing, Recruitment and Enrollment.

will result in meeting their projected enrollment numbers. Furthermore, the applicant was unable to identify specific community organizations that they intend to build a relationship with to support the recruitment and enrollment of students at the elementary level. This lack of a compelling recruitment plan or description of existing community partnerships that would support the school's enrollment efforts created concern among the review committee that the network team would be unable to effectively recruit and retain students for the new school.

Given that this is the first elementary school for the network, the review committee expected to find a rationale to support its proposed remediation plan, evidence that the network is prepared for the unique challenges an elementary school brings, and clear community support and demand for a new K-8 school in the Whitehaven community. However, the applicant did not include sufficient evidence of these rubric requirements and therefore, the review committee scored this section as partially meeting the standard.

Strengths Identified by the Committee:

While the Academic Plan Design and Capacity partially meets standard because of the weaknesses described above, the review committee did find evidence of strengths within this section. Specifically, the applicant is knowledgeable about its intended student population, provided a compelling mission and vision for the school with measurable and attainable goals, and plans to provide significant wrap-around support services for its students and families. The review committee cited an additional strength within the applicant's plan for providing support and development opportunities to parents through the development of a "Parent University". The applicant has an undeniable desire to serve the students of Memphis and to build a strong community within each of their schools.

Analysis of the Operations Plan and Capacity

Rating: Meets or Exceeds Standard

Strengths Identified by the Committee:

The applicant's Operations Plan and Capacity meets or exceeds standard because it provided evidence of a strong governing board with clear roles and responsibilities, presented viable options for a facility, and described a strong regional support team with effective systems for recruiting and developing staff for a new school.

As required by the rubric, the applicant provided a clear description of its governance structure and further explained how that structure supports its schools. While part of a larger Green Dot network, GDPST operates as its own entity in Tennessee with specific roles and responsibilities outlined in the application. The governing board oversees each of GDPST's five (5) existing schools, directly manages the region's Executive Director (ED), and is responsible for determining when to apply for an expansion within the region. The governing board is comprised of seven (7) members responsible for the oversight of approximately 2,000 students, thus creating a small member to student ratio. Within the application, GDPST included details about the board's ongoing evaluation of its schools' academic, operational, and financial success, as well as a regular evaluation of the ED. The review committee found evidence of the governing board's ability to provide effective oversight of its schools through its use of committees and intentional recruitment of members with diverse backgrounds to support all aspects of the schools.

Another area of strength within this section was the applicant's sound plan in selecting, financing, and renovating a facility. Within the application, the applicant detailed a plan to incubate in a non-permanent facility, such as within one of its current schools or a church within the community. During the capacity interview, the review committee inquired about any updates to the facility plan to which the Director of Finance and Operations (DFO) described the team's experience with facility renovations, operating on short timelines, and adapting plans based on unanticipated facility challenges. The DFO elaborated on the team's ability meet their facility needs through incubation, citing its newest school, Bluff City High School, as evidence of the team's experience with a similar plan. The DFO shared that the team had identified three (3) possible facilities in the Whitehaven community and would be able to apply a retrofit for the school's early years in operation. From there, the school would complete its build-out in phases and finance the construction by means of grants and financing options through national lenders familiar with GDPST's facility model.

A third strength of the operational plan lies within the strength of the regional team. The rubric clearly states that a school's chosen leaders must have the necessary qualifications, competencies, and capacity for their assigned roles and the review committee found significant evidence of this among GDPST's regional team. Green Dot K-8's application included a clear description of the responsibilities for each member of the regional team as well as the experience they bring to their roles, most of which have been part of GDPST since its inception. As demonstrated through their knowledgeable and thoughtful responses during the capacity interview, the regional team is invested in the success of each of their schools and has established specific support structures to train and grow their school teams. For example, the regional team's Director of Academics oversees and coordinates network-wide professional development, five (5) subject-specific curriculum specialists, and instructional coaching. The applicant also described its process for developing its leaders through regular coaching and leadership opportunities available within the schools and network.

Analysis of the Financial Plan and Capacity

Rating: Meets or Exceeds Standard

Strengths Identified by the Committee:

The applicant's Financial Plan and Capacity meets or exceeds standard because the applicant provided a complete and well-supported budget, the regional network is in strong fiscal health, and the new school has the financial support of its national network should it fall into financial need.

As presented in the application, the budget contains reasonable assumptions and budget numbers that reflect the operator's experience with its existing schools in Tennessee. The applicant's budget is largely dependent on state and local funds to cover the costs of the school with little to no need of outside philanthropy dollars to operate the school. The budget projects that by Year 3, the new school will be financially self-sufficient, operating with a net income of \$44,427. The budget also cites the Charter School Program Grant as the sole revenue source to cover all of the expenses in Year 0, and the applicant confirmed receipt of the grant during the capacity interview. In addition to the complete, realistic and viable startup and five-year operating budgets, the rubric also requires applicants to provide a sound contingency plan to meet financial needs if necessary. As part of the budget narrative within the application, the applicant detailed their contingency budget process, which included best practices developed through operational experience. These contingency budgets included reducing the amount allocated to classroom materials and supplies, deferring technology upgrades or replacement, seeking additional philanthropy or local, state or federal funding sources for high needs students, and developing a lower enrollment model with 78 students per grade in K-5 and 120 students per grade in 6-8 as a backup plan.¹⁰

The applicant's financial plan is consistent with GDPST's existing schools and demonstrates the strong financial health of the region. As shared by the DFO during the capacity interview, all five (5) of GDPST's schools are now financially self-sufficient. The DFO further explained that, because their existing schools are able to operate without financial support from the region, the region could focus all of its financial and fundraising efforts on the new school. In addition, the applicant explained that GDPST recently hired a new regional staff member to help fundraise locally. The review committee noted a low financial performance rating for one of its schools, Bluff City High School, based on the 2017-18 school year. During the capacity interview, the review committee asked how the applicant responded to the rating and about the status of the items that did not meet the standard. The applicant cited recent internal success in sourcing funding through additional grant dollars as one response and added that the region is now exceeding its enrollment targets, therefore positively affecting its financial standing. The applicant also explained how the regional staff and governing board have shifted their focus to the deficiencies flagged in the performance rating and will continue to monitor their financial progress through internal reviews.

Beyond GDPST's contingency budgets included within the application, the applicant also provided evidence of the national network's ability to provide financial support to the new school and region, should anticipated revenues drop lower than previously estimated. During the capacity interview, the CEO of Green Dot Public Schools stated that the national network is committed to supporting Green Dot K-8 and can fund the school if needed. Based on this affirmation and the network budget submitted as part of the application, the review committee found evidence of a strong contingency plan in Green Dot K-8's

¹⁰ Green Dot Charter K-8 School application, Attachment P: Budget Narrative.



reliance on its regional and national networks' capacity to provide additional financial support to the school.

Analysis of the Portfolio Review and Performance Record

Rating: Partially Meets Standard

Weaknesses Identified by the Committee:

The applicant's Portfolio Review and Performance Record partially meets standard because of a lack of evidence supporting successful student outcomes for each school within the network. While the review committee acknowledges the growth occurring at some of the network's schools, the committee determined that GDPST was unable to present evidence of successful student outcomes for all of the network's schools.

The rubric states that an applicant must provide "clear, compelling evidence of successful student outcomes for each school in the network and evidence that the operator's schools are high performing and successful by meeting state standards".¹¹ GDPST is in its fifth (5th) year of operation and four (4) of its five (5) existing schools are transformation schools within the Achievement School District (ASD). While the transformation work is challenging and students often enter these schools performing several years behind grade level, the review committee expected to find evidence of growth and academic achievement among all GDPST's schools. However, the only school within the network consistently achieving high growth, as measured by the Tennessee Value-Added Assessment System (TVAAS), is Bluff City High School (Bluff City). Bluff City is in its third year of operation and earned a Level 5 composite for the past two years. While this growth is impressive, Bluff City's academic proficiency data is very low, with less than 10% of students scoring at or above grade level in ELA and math. Comparatively, GDPST's other high schools, Fairley High School and Hillcrest High School, both located in the neighborhood of the proposed K-8 school, received TVAAS Level 1 composite scores in 2016-17 and 2017-18. Additionally, Fairley High School landed on the 2019 Priority School List because of its poor academic data. GDPST's middle schools show similar low proficiency and growth within both Kirby Middle School and Wooddale Middle School, receiving a TVAAS Level 1 and less than 10% of its students scoring at or above grade level on the ELA and math TNReady assessments in 2018-19. Given this information, the review committee was unable to find sufficient evidence of successful student outcomes for each school within the network. It is clear to the review committee that the applicant has a strong regional team and the capacity to operate an additional school but will need to provide evidence of consistently high-performing schools within its network before placing all of its energy and attention on a new school.

Strengths Identified by the Committee:

While the Portfolio Review and Performance Record partially meets standard because of the weaknesses described above, the review committee did find evidence of strengths within the section. As detailed in the application and further explained during the capacity interview, GDPST utilizes a data-driven model responsive to the needs of its schools. In response to their low academic performance, the regional team made curriculum adjustments, increased coaching supports for teachers, and developed a strong intervention plan for struggling teachers and leaders. In addition, GDPST's high schools are consistently experiencing over 85% graduation rates across all three schools.

¹¹ Tennessee Charter School Application – Ratings and Scoring Criteria, Section 4.1 Portfolio Review/Performance Record.



Evaluation Team

Binh Doan is the Director of Operations at Aurora Collegiate Academy, a K-5 charter elementary school in Memphis, Tennessee. Binh has experience teaching at both the elementary and middle school level. Additionally, she has served on the board of The Collective Memphis, Teach For America's association for alumni of color and the regional strategy team for 90-ONE, a Memphis-based organizing network for educational equity. Binh is an alum of Teach For America - Memphis, New Memphis' Embark program, and the Breakthrough Collaborative's teaching fellowship. Binh holds a Bachelor of Arts in Archaeological Studies from Yale University and a Master of Education from Christian Brothers University.

Ali Gaffey serves as the Deputy Director of Charter Schools for the Tennessee State Board of Education. In this role, she oversees the charter school appeals process and authorizer responsibilities of the State Board. Prior to joining the State Board, Ali was the 7th and 8th grade Academic Dean at STEM Prep Academy, a charter school serving a largely immigrant population in Southeast Nashville. Ali is a former middle and high school English teacher and Teach For America alum with a decade of experience in Education. Ali has taught and led in charter schools in both Nashville and New Orleans and loves the innovation and quality education opportunities charter schools provide. Ali earned her Bachelor of Arts at the University of Florida.

Mark Modrcin currently serves as the Director of Authorizing for the State Public Charter School Authority of Nevada, helping oversee the performance of nearly 35 charter school operators statewide that serve over 45,000 students. Mark has also worked as a district authorizer in Tulsa, Oklahoma, overseeing a much smaller portfolio while also focusing on the development of a Charter Collaboration Compact, which aimed to develop synergies between the district and the sponsored public charter schools. Mark holds a Bachelor of Science degree in Business from Miami University, a Master of Business Administration degree from the University of Tulsa, and is a 2015 alum of the National Association of Charter School Authorizers (NACSA) Leaders Program.

Stephanie Rizas has served as an educator in the state of Maryland for 13 years. She has worked as both a classroom teacher and an instructional coach for middle and high school students as well as administrators. She serves on the board for the National Consortium for Teaching About Asia as well as the journal, *Education About Asia*. She also coordinates online workshops for teachers across the United States to develop curriculum about Asia for use in a wide range of disciplinary fields. As a lead teacher with National Board certification, she continues to mentor her fellow teachers. Stephanie is a summa cum laude graduate of the University of Maryland, College Park with a Bachelor of Arts and Master of Arts in curriculum and instruction, with a focus in social studies. Stephanie is committed to education and abides by the philosophy that every child deserves quality, accessible, and meaningful educational experiences.

Earl Simms is a charter school authorizing consultant and advocate in St. Louis, MO. He is the former Director of the Division of Charter Schools at the Kentucky Department of Education and the St. Louis Director for the University of Missouri's charter school office. Simms also previously served as the Senior Director for the Missouri Charter Public School Association.

Robert Wallace serves as the Director of Operations at KIPP Antioch College Prep Elementary. Robert was first introduced to education through Teach For America. After completing Teach For America's two-year



teaching requirement, Robert continued to serve students in the Nashville community as an educator. Robert taught middle school reading, math, science and social studies in Metro Nashville Public Schools for four years. Robert is a cum laude graduate of Belmont University with a Bachelor of Business Administration in Business Management. Robert earned his Master of Education in Instructional Practice at Lipscomb University. He is continuing his education at Vanderbilt's Peabody College as a candidate for a Doctorate of Education in Leadership and Learning in Organizations. Robert is committed to ensuring that all students receive an excellent education, such that they are able to increase their college access and live choice-filled lives.



Green Dot Charter K-8

Review Committee Recommendation: **Deny**

Proposed School Name	Proposed School Focus	Proposed Region/Location
Green Dot Charter K-8	College Preparatory	Whitehaven

School Mission

“The mission of the proposed school, Green Dot Charter K-8 School...will be to provide the foundation that prepares ALL students for success in high school and subsequently for college, leadership and life using a rigorous standards-aligned education program within a tightknit school community where all stakeholders actively engage in the education process.”

School Plan Summary

Green dot Charter K-8 intends to open a K-8 school focused on preparing students for college, leadership, and life by focusing on student achievement, school culture, engaged parents and communities, highly effective employees, and by utilizing an effective school model. Green Dot will provide a foundation that prepares all students for success by using a standards-aligned educational program and by providing a tight-knit school community where everyone is involved in the education process.

Leadership and Governance

Full Name	Current Job Title and Employer	Position with Proposed School
Megan Quaile	Executive Director, GDPST	Regional Office Team Member
Dan Penaranda	Director of Finance & Operations, GDPST	Regional Office Team Member
Randi Demagistris	Director of Human Capital & HR, GDPST	Regional Office Team Member
Chrystie Edwards	Director of Academics, GDPST	Regional Office Team Member
Lameika Pegues	Director of Student Support Services, GDPST	Regional Office Team Member
Jocquell Rodgers	Director of Community Engagement & Public Relations, GDPST	Regional Office Team Member

Proposed Grade Structure and 5-year Enrollment Projections

Academic Year	Planned # of Students	Grades Served
2020-2021	300	K, 6
2021-2022	600	K-1, 6-7
2022-2023	900	K-2, 6-8
2023-2024	1020	K-3, 6-8
2024-2025	1140	K-4, 6-8
2025-2026	1260	K-8

Application Ratings and Comments by Section

This section should include a summary of comments from all reviewers.

Section/Rating	Strengths/Highlights	Concerns/Areas for Improvement
<p>Academic Plan Design and Capacity</p> <p><input type="checkbox"/> Meets or Exceeds</p> <p><input checked="" type="checkbox"/> Partially Meets</p> <p><input type="checkbox"/> Does Not Meet</p>	<p>The applicant has demonstrated a strong core mission and has clearly and thoughtfully integrated that mission throughout the application.</p> <p>The applicant provides a deep understanding of and dedication to meeting of the needs of the area in which they intend to open as well as a strong commitment to students well-being through their stated mental health and wrap around services.</p> <p>The applicant has demonstrated a passion for fostering scholarship in students as well as clear processes for continually setting, monitoring, and revising academic goals for students and the proposed school at-large.</p> <p>The applicant has demonstrated the capacity to implement an RTI2 program that provides appropriate differentiated instruction to students with disabilities and English language learners.</p>	<p>The applicant has provided a student discipline policy that outlines appeals processes for school operated under the ASD and the State Board of Education. However, there is no policy outlined for schools that would be authorized by Shelby County Schools. It is concerning that the network would fail to incorporate this feedback, demonstrating a lack of capacity to operate a network of schools under three different authorizers.</p> <p>Per SCS Board Policy #1011, Section VI, B. 5 – “the district shall consider whether the establishment of a proposed charter school in a particular geographic location of the LEA is feasible or will create oversaturation in the proposed geographic location.” According to the most recent strategic regional analysis, the Whitehaven community has a current student capacity of 8,627 students but only has 7,531 students at the K-8 level; this means Whitehaven is over-saturated by 1,096 seats.</p>
<p>Operations Plan and Capacity</p> <p><input type="checkbox"/> Meets or Exceeds</p> <p><input checked="" type="checkbox"/> Partially Meets</p> <p><input type="checkbox"/> Does Not Meet</p>	<p>The applicant demonstrates an organizational background in operational planning and capacity as exemplified by their governance structure, personnel and human capital plan, professional development program, and additional operations plans.</p>	<p>The applicant’s current plan for addressing the low achievement scores earned by the network’s high schools is to open this K-8 school. The applicant has not addressed the differences in structure (zoned students vs. no zoned students) that will greatly impact the network’s proposed feeder pattern. This demonstrates a lack of understanding of the difficulties involved with operating under multiple authorizers and the policies and underlying structures associated with each.</p>
<p>Financial Plan and Capacity</p> <p><input type="checkbox"/> Meets or Exceeds</p> <p><input checked="" type="checkbox"/> Partially Meets</p> <p><input type="checkbox"/> Does Not Meet</p>	<p>The applicant provided detailed financial procedures, policy, or other reasonable assurance that the proposed school will have sound systems and processes in place for accounting, payroll, and independent annual school-level and network-level.</p> <p>The applicant provided individual and collective qualifications for implementing the financial plan successfully, including capacity in areas such as financial management, fundraising and development, and accounting.</p>	<p>The applicant’s revenue assumption shows negative ending fund balances for years 1-4.</p> <p>The budget assumption for years 1-5 increased expenditures while revenues stayed the same. The budget assumption also includes a line for debt service (in year 3) on an already strained budget. A decrease in enrollment could compound the issue causing financial instability.</p> <p>The network cannot currently cover any shortfalls arising from not meeting enrollment projections using its revenues.</p>

<p>Performance Record (if applicable)</p> <p><input type="checkbox"/> Meets or Exceeds</p> <p><input checked="" type="checkbox"/> Partially Meets</p> <p><input type="checkbox"/> Does Not Meet</p>	<p>The applicant provided evidence of three of five of their network schools earning a TVAAS level 5.</p>	<p>After reviewing the data for Green Dot Public Schools across the network, two of its three schools earned a TVAAS level 1 last year. Three schools earned a TVAAS level 5, however these scores were not consistent across multiple years. Proficiency rates in ELA increased from 2017-2018 from 6% to 7% and 4% to 10% and math proficiency rates increased from 3% to 8% and 5% to 11% respectively.</p> <p>Though the network is improving, we do not think that Green Dot's TVAAS or proficiency scores are strong enough to justify approving more schools at this time. New schools require intensive and focused management and adding additional school would put additional strain on the local network.</p>
--	---	---

Section	Summary of Application Supplement	
---------	-----------------------------------	--

<p>Application Supplement</p>	<p>There is a need for higher performing schools in the Southwest region but, at present, the region and the neighborhood (Whitehaven) are over-saturated with K-8 schools.</p> <ul style="list-style-type: none"> • The proposed region (Southwest) is currently under-enrolled by 1,523 seats at the K-8 Level • The proposed neighborhood (Whitehaven) is currently under-enrolled by 1,096 seats at the K-8 Level • At present, only 34% of the seats in the Southwest region are at a level '3' or above on the School Performance Scorecard 	
--------------------------------------	--	--

Section	Summary of Financial Hardship & Impact	
---------	--	--

<p>Financial Hardship & Impact</p>	<p>Expansion of charter schools imposes a cost on SCS – both directly and indirectly. It is also clear from Section 4 of the Fiscal Impact Report that the loss of operating funds caused by the transfer of BEP funds cannot be made up through a reduction in capital or facility costs or through the collection of an authorizer fee or lease agreements.</p> <p>Green Dot Charter K-8 fiscal impact on SCS includes:</p> <ul style="list-style-type: none"> • The District losing 300 to 1,400 students over a 6-year period; • Per pupil cost is projected at \$9,319 and \$10,289, including transportation cost, for Year 1 and Year 6, respectively; Per pupil is projected to increase at a rate of 2% for inflationary cost; • Transferring BEP funds of \$2,795,640 to \$12,963,772, including transportation cost, without reducing operational costs; • Fixed costs, such as electricity, custodial, etc., will be required to be funded regardless of reduced enrollment; • Variable costs, such as instructional materials, supplies, etc., are associated with each student will increase or decrease directly proportionate to the number of students; • A large decline in enrollment may prompt reduction in teaching staff, but may not offset total loss of revenue; • Maximum authorizer fee is \$35,000, which is not enough to recover the cost of additional services provided by the District; and • Additional seats will become available within the Whitehaven community resulting in lower percentage utilization. 	
---	--	--