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**BEFORE THE TENNESSEE STATE BOARD OF EDUCATION**

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**IN RE:** ) **State Board of Education Meeting**  
**Gaffney Athletic Preparatory Academy** ) **August 17, 2020**  
**Charter School Appeal** )  
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**FINDINGS AND RECOMMENDATION REPORT  
OF THE EXECUTIVE DIRECTOR**

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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 State Board of Education (State Board). On June 22, 2020, the sponsors of Gaffney Athletic Preparatory Academy (GAPA) appealed the denial of its amended application by the Monroe County Schools (MCS) 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 GAPA amended application was not “contrary to the best interests of the students, LEA, or community.”<sup>1</sup> Therefore, I recommend that the State Board affirm the decision of MCS to deny the amended application for GAPA.

**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 GAPA 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.”<sup>2</sup> In addition, the State Board is required to hold a public hearing in the district where the proposed charter school seeks to locate.<sup>3</sup>

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<sup>1</sup> T.C.A. § 49-13-108.

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

<sup>3</sup> T.C.A. § 49-13-108. Due to the public health emergency, the public hearing was held virtually.

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 amended charter application was contrary to the best interests of the students, LEA, or community.<sup>4</sup> Because GAPA is proposing to locate in a school district that does not contain a school on the current or last preceding priority school list, the State Board has the ability to affirm the local board's decision to deny or to the remand the decision to the local board of education with written instructions for approval of the charter.

#### **PROCEDURAL HISTORY**

1. On December 3, 2019, the Sponsor submitted a letter of intent to MCS expressing its intention to file a charter school application.
2. The Sponsor submitted its initial application for GAPA to MCS on February 3, 2020. MCS assembled a review committee to review and score the GAPA application.
3. On April 6, 2020, the MCS Board of Education and its review committee held a capacity interview with the Sponsor during its scheduled workshop.
4. The MCS review committee recommended denial of the GAPA initial application.
5. On April 9, 2020, the MCS Board of Education voted to deny the GAPA initial application based upon the review committee's recommendation.
6. The Sponsor amended and resubmitted its application for GAPA to MCS on May 18, 2020.
7. MCS's review committee reviewed and scored the GAPA amended application and again recommended denial.
8. On June 11, 2020, based on the MCS review committee recommendation, the MCS Board of Education voted to deny the GAPA amended application.
9. The Sponsor appealed the denial of the GAPA amended application in writing to the State Board on June 22, 2020, including submission of all required documents per State Board policy 2.500.
10. The State Board's Review Committee independently analyzed and scored the GAPA amended application using the Tennessee Department of Education's charter application scoring rubric.
11. On July 16, 2020, the State Board staff held a virtual public hearing. At the public hearing, the Executive Director, sitting as the State Board's designee, heard presentations from the Sponsor and MCS and took public comment regarding the GAPA application.

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<sup>4</sup> Ibid.

12. The State Board’s Review Committee conducted a capacity interview with the founding board of GAPA and key members of the leadership team on July 30, 2020. Due to the COVID-19 public health emergency, the capacity interview was held virtually.
13. After the capacity interview, the State Board’s Review Committee determined a final consensus rating of the GAPA amended application, which served as the basis for the Review Committee Recommendation Report, attached hereto as **Exhibit A**.

**FINDINGS OF FACT**

- **District Denial of Application.**

The review committee assembled by MCS to review and score the GAPA initial and amended applications consisted of the following individuals:

Name	Title
Lee Anne Strickland	Executive Director of Federal Programs and Academics, MCS
Dr. DeAnna McClendon	Director of Schools, MCS
Kristi Windsor	Assistant Director of Schools, MCS
Trey Ferguson	Supervisor of Exceptional Education, MCS
Libby Hicks	Finance Director, MCS
Dr. Lon Shoopman	Monroe County Community Member
Rev. Gale Miller	Monroe County Community Member
Shauna Bowers	Supervisor of Instruction K-8, MCS (Academic Plan) <sup>5</sup>
Debi Tipton	Sequoyah High School Principal, MCS (Academic Plan)
Brooke Johannsen	Attendance & Student Management Coordinator, MCS (Academic Plan)
Marsha Standridge	School Board Member, MCS (Academic Plan)
Janie Evans	School Board Member, MCS (Academic Plan)
Mike Martin	Sweetwater High School Athletic Director, MCS (Academic Plan)
Justin Miller	Sequoyah High School Athletic Director, MCS (Academic Plan)
Shawn Yates	Tellico Plains High School Athletic Director, MCS (Academic Plan)
Phillip Carrol	Maintenance Supervisor, MCS (Operations Plan)
Megan Bushey	Maintenance Secretary, MCS (Operations Plan)
Bradley Ogle	Director of Technology, MCS (Operations Plan)
Sandra Blair	Administrative Assistant; Finance & Personnel Coordinator, MCS (Operations and Financial Plans)
Lisa Arden	Nutrition Supervisor, MCS (Operations Plan)
Kelly Robinson	Instructional Technology Coach, MCS (Operations Plan)
Charlie Lee	Transportation Director, MCS (Operations Plan)
John Ridgell	School Board Member, MCS (Operations Plan)
Dewitt Upton	School Board Member, MCS (Operations Plan)

<sup>5</sup> These review committee members only reviewed and scored the portion of the application noted in parentheses.

Sharon Freeman	School Board Member, MCS (Operations Plan)
Eric Weaver	Sweetwater High School Principal, MCS (Operations Plan)
Gail Sensibaugh	Accountant, MCS (Financial Plan)
Courtney Viar	Assistant Director of Finance, Monroe County Finance Office (Financial Plan)
Sonya Lynn	School Board Member, MCS (Financial Plan)
Jason Miller	School Board Member, MCS (Financial Plan)
Jo Cagle	School Board Member, MCS (Financial Plan)
Russel Harris	Tellico Plains High School Principal, MCS (Financial Plan)

The MCS review committee found that each of the three sections of the GAPA initial application failed to meet the standard of the state rubric for approval. After the MCS review committee completed its review and scoring of the initial application, its recommendation was presented to the MCS Board of Education on April 9, 2020. Based on the review committee’s recommendation, the MCS Board of Education voted to deny the initial application of GAPA.

Upon resubmission, the MCS review committee reviewed the GAPA amended application and found that the GAPA amended application again failed to meet the standard of the state rubric for approval.<sup>6</sup>

After the MCS review committee completed its review and scoring of the amended application, its recommendation was presented to the MCS Board of Education on June 11, 2020. Based on this recommendation, the MCS Board of Education voted to deny the amended application of GAPA.

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

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

Name	Title
Ali Gaffey	Deputy Director of Charter Schools, State Board of Education
Michelle Doane	Independent Education Consultant
Chad Fletcher	Federal Programs Supervisor, Bedford County Schools
Nate Parker	Coordinator of Policy and Federal Programs, State Board of Education

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

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<sup>6</sup> Please see **Exhibit B** for a copy of the final review committee rubric.

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

The Review Committee recommended that the application for GAPA be denied because the Sponsor failed to provide sufficient evidence in the academic, operational, and financial sections that the application met the required criteria of the state rubric.

The Review Committee found the academic plan presented by the Sponsor lacked a comprehensive academic focus, measurable student achievement goals, and a plan to monitor student performance. Additionally, the application did not adequately describe how the school would serve its special populations and at-risk students. Furthermore, the application lacked a compelling marketing, recruitment, and enrollment plan.

The Review Committee further determined the operations plan did not provide a realistic start-up plan, including how the Sponsor would recruit its staff in Year 0. In addition, the application lacked a finalized transportation plan, which significantly impacts the Sponsor’s student recruitment plan and budget. Lastly, the Review Committee found the application failed to provide a comprehensive plan for renovations of the selected facility as well as a timeline for preparing the campus to serve its students.

The financial plan presented by the Sponsor provided the Review Committee with little evidence of a complete, realistic, and viable five (5) year operating budget. The Review Committee found the budget significantly underestimated costs, omitted essential budget line items, and was misaligned within several key areas of the application narrative. Furthermore, the Review Committee found that the Sponsor lacked a fundamental understanding of the Basic Education Program (BEP), provided minimal evidence for how the school would manage funding for students enrolled from outside of the district and was unable to describe how inter-district enrollment would impact the budget. In totality, the Review Committee was unable to find sufficient evidence of a sound financial plan for the school.

In summary, the Review Committee determined that the Sponsor did not provide sufficient evidence in the academic, operational, and financial sections of the GAPA amended 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 GAPA application be denied.

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

- **Public Hearing**

Pursuant to statute<sup>7</sup> and State Board policy 2.500, a public hearing chaired by the Executive Director was held virtually on July 16, 2020. MCS's presentation at the public hearing focused on the deficiencies found by the MCS review committee in four (4) key areas: insufficient funding, inadequate facilities, transportation, and lack of need for an additional school in the community. Specifically, MCS outlined concerns with the school's budget, noting that the budget did not account for numerous staff positions that were discussed in the application. Additionally, MCS noted concerns that the pay scale proposed by the Sponsor was not competitive or consistent across the application and that the school was unable to present a financial contingency plan. MCS also argued that the facility proposed by the school required extensive renovations to be brought up to code, and that none of the renovation costs were accounted for in the budget. Additionally, MCS revealed liens against the proposed facility that were also not accounted for in the budget. MCS explained that the transportation plan for the school was not realistic as it proposed busing students from both Chattanooga and Knoxville to Monroe County, which MCS noted would require students to likely exceed state-mandated requirements for maximum time in transit on a school bus. Finally, with regard to a lack of need in the community, MCS highlighted that it is a rural district consisting of 5,200 students, it is a Tennessee Value Added Assessment System (TVAAS) level 5 district, and that Sequoyah High School, a state Reward school, is currently under capacity and located only 3.7 miles away from the proposed charter high school. In addition to these statistics, MCS representatives stated that the district has seen an enrollment decline over the last ten years and that the proposed school's enrollment projections were not realistic given this fact, especially since the school was planning to market itself as a school specifically for athletic enthusiasts.

In response to MCS, the Sponsor highlighted their unique model, stating they would be the nation's first charter high school focused on careers in sports, utilizing concepts of science, technology, engineering, and math (STEM) through the lens of athletics. The Sponsor stated that they did not determine a need for the school in the Madisonville community; however, they chose the location of the former Hiwassee College as it served their vision for the school and would be an investment in the Monroe County and Madisonville community. The Sponsor researched enrollment in the east Tennessee counties surrounding the proposed facility and found it to be centrally located between Knoxville and Chattanooga, which would allow them to recruit students from outside Monroe County to attend the school. Further, the Sponsor recognized that as a small district they may not see a large percentage of students from within Monroe County enroll in the school (they estimated between 15-40% in-district students<sup>8</sup>) but would like to work with MCS as a partner to bring economic development to the area. Additionally, the Sponsor stated it could be flexible with its staffing and teaching positions if actual enrollment was lower than its projections and acknowledged one of its biggest challenges in the first year would be figuring out transportation for students from outside of the district.

A portion of the public hearing was dedicated to taking public comment, which was read aloud by State Board staff. Two (2) public comments were received, one (1) in support of the school and one (1) opposed to the school's approval. The State Board also provided a window for members of the public to

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<sup>7</sup> T.C.A. § 49-13-108(b)(4).

<sup>8</sup> This percentage conflicted with the percentage range contained within the application.

submit written comments. The State Board received fifteen (15) comments in support of the school and two (2) comments opposed to the school's approval.

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

State Board staff collected and analyzed detailed information regarding MCS'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 MCS regarding its application process and alignment to the Quality Authorizing Standards. MCS articulated that its application process is fair, transparent, and focused on quality with rigorous criteria for approval. As evidence of this, MCS 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 the applicant to ensure a fair review.<sup>9</sup> Additionally, as this was the first application received by MCS, members of the review committee consulted with other districts who currently serve as charter school authorizers for advice on running an application process. Based on the information presented by MCS, the district's process appears in alignment with State Board Quality Authorizing Standards.

### **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 contrary to the "best interests of the students, LEA, or community."<sup>10</sup> 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's Report, the documentation submitted by both the Sponsor and MCS, the arguments made by both the Sponsor and MCS 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, citing specific examples in the application and referencing information gained at the capacity interview in support of its findings. For the reasons explicated in the report, I agree that the GAPA amended application did not rise to the level of meeting or exceeding the standards required for approval.

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

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<sup>9</sup> If MCS conducts additional charter application reviews in the future, State Board staff recommends that MCS create a review committee that does not include all members of the local board of education. While it is important for the local board of education to be involved in the charter application review process, it is also important that the district maintains clear lines of authority between the review committee, which is responsible for reviewing and recommending approval or denial of the application, and the ultimate decision-making authority of the local board of education based upon the information presented by the review committee.

<sup>10</sup> T.C.A. § 49-13-108.

be authorized. It is readily apparent that the Sponsor is passionate about bringing a unique option to students in East Tennessee and that there exists support for an organization that is willing to take over and revitalize the former Hiwassee College campus in Madisonville. However, I agree with the Review Committee's assessment that the application as a whole lacked a coherent academic plan, recruitment strategy, transportation plan, and financial planning necessary to merit approval. Specifically, the Sponsor was unable to specify the curriculum it would use, the timeline for selection of a curriculum, or how the two (2) curriculum choices it was considering would support the proposed STEM/athletic focus of the school. Additionally, the Sponsor did not demonstrate how it would meet the needs of all learners, especially students with disabilities, English learner (EL) students, and other at-risk student populations, and did not demonstrate a strong understanding of the legal requirements to serve special education and EL students. The Sponsor's academic plan also lacked clarity on how the ambitious enrollment projections would be met. When asked by the Review Committee for additional details about the plan to recruit students from a variety of cities and towns throughout East Tennessee, the Sponsor stated they did not plan to actively recruit students but would rely on generated interest in the school through word of mouth and media attention. Given the rural location of the school and the declining enrollment in the area, there is no evidence that this plan will be viable or sufficient to meet the school's enrollment projections.

Additionally, the Sponsor did not provide a realistic start-up plan, including how the Sponsor would recruit and train staff. The application also lacked a finalized transportation plan, which significantly impacts the student recruitment plan and budget. The Sponsor similarly failed to provide a comprehensive plan for renovations of its facility, anticipated costs, as well as a timeline for preparing the campus to serve students. Finally, the budget provided by the Sponsor significantly underestimated costs, omitted essential budget line items, and was misaligned with several areas of the application narrative. Moreover, the Review Committee found the Sponsor lacked a fundamental understanding of the Basic Education Program (BEP) and was able to provide only minimal explanation of how the school would manage funding for students enrolled from outside of the district as well as how inter-district enrollment would impact budget projections. Each of these concerns amounted to a lack of compelling evidence of a sound financial plan for the school. A quality authorizer requires all applications to present evidence of a solvent and sustainable budget and contingency financial plans, and the applicant did not present clear and convincing evidence that it meets this standard for approval.

Therefore, because the application did not meet the standard for approval in the academic, operational, or financial sections of the state rubric, I cannot recommend that the State Board approve the Sponsor's 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 Gaffney Athletic Preparatory Academy 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 MCS to deny the amended application for Gaffney Athletic Preparatory Academy.





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Dr. Sara Morrison, Executive Director  
State Board of Education

8/17/2020

Date



EXHIBIT A

**Charter Application Review Committee Recommendation Report**

**August 7, 2020**

School Name: Gaffney Athletic Preparatory Academy (GAPA)

Sponsor: Sports University International, Inc.

Proposed Location of School: Monroe County Schools

Evaluation Team:

Michelle Doane  
Chad Fletcher  
Ali Gaffey  
Nate Parker

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 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 that 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 the 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 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 virtual interview with the sponsor, members of the proposed founding 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, 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 (if applicable); assessments; school schedule; special populations and at-risk students; school culture and discipline; marketing, recruitment, and enrollment; community involvement and parent engagement; and the capacity to implement the proposed plan.
  - b. Operations Plan and Capacity: governance; start-up plan; facilities; personnel/human capital; professional development; insurance; transportation (if applicable); food service; additional operations (if applicable); waivers; and the capacity to implement the proposed plan.
  - c. Financial Plan and Capacity: budget narrative; budget; cash flow projections; related assumptions; financial policies and procedures; and the capacity to implement the proposed plan.

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: Gaffney Athletic Preparatory Academy (GAPA)

Sponsor: Sports University International, Inc.

Proposed Location of School: Monroe County Schools

Mission:<sup>1</sup> The mission of GAPA, a T.E.A.M.S. (Technology, Engineering, Athletics, Mathematics, and Science) Academy, is to create a culture where experiential learning opportunities will engage and prepare sports enthusiasts for college, careers, and life by using the T.E.A.M.S. learning model. This model will help to ensure that every sports enthusiast is able to embrace teamwork, to develop problem-solving skills, and to become a champion through the creative process of receiving a high-quality education and college readiness preparation.

Number of Schools Currently in Operation by Sponsor: 0

Proposed Enrollment:<sup>2</sup>

Grade Level	Year 1 (2021)	Year 2 (2022)	Year 3 (2023)	Year 4 (2024)	Year 5 – At Capacity (2025)
9	175	175	175	175	200
10	0	175	175	175	200
11	0	0	175	175	200
12	0	0	0	175	200
<b>Total</b>	<b>175</b>	<b>350</b>	<b>525</b>	<b>700</b>	<b>800</b>

### Brief Description of the Application:

Sports University International, Inc. is proposing to open a high school in Madisonville, TN<sup>3</sup> and serve students, referred to throughout the application as “sports enthusiasts”, in grades 9 through 12 from across the state and country. GAPA is a new-start school and plans to utilize a technology, engineering, athletics, mathematics, and science (TEAMS) instructional model infused with project-based and blended learning to offer a unique option that integrates athletics and academics for high school students.<sup>4</sup>

The proposed school would be organized under the existing non-profit entity, Sports University International, Inc. The applicant projects the school will have \$1,300,000 in revenue and \$292,590 in expenses in Year 0, resulting in a positive ending balance of \$1,007,410. In Year 1, the applicant projects the school will have \$2,465,000 in revenue and \$1,332,624 in expenses, resulting in a net income of \$1,132,376 and a positive ending fund balance of \$2,139,786. By Year 5, the school projects to have

<sup>1</sup> Gaffney Athletic Preparatory Academy amended application, pg. 2.

<sup>2</sup> Ibid. pg. 6.

<sup>3</sup> Ibid. pg. 6.

<sup>4</sup> Ibid. pg. 2.



\$4,416,250 in revenue and \$4,085,920 in expenses, resulting in a net income of \$330,330 and a positive ending fund balance of \$6,616,177.<sup>5</sup> The school did not include any anticipated percentages of students who will qualify as economically disadvantaged, who will be students with disabilities, or who will be English Learners (ELs), stating that these percentages are “to be determined upon enrollment”.<sup>6</sup>

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<sup>5</sup> Ibid. Attachment O-Planning and Budget Worksheet.

<sup>6</sup> Ibid. pg. 6.



## Summary of the Evaluation

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

The academic plan presented by the applicant lacked a comprehensive academic focus, measurable student achievement goals, and a plan to monitor student performance. Additionally, the application did not adequately describe how the school would serve its special populations and at-risk students. Furthermore, the application lacked a compelling marketing, recruitment, and enrollment plan.

The operations plan did not provide a realistic start-up plan, including how the applicant would recruit its staff in Year 0. In addition, the applicant lacked a finalized transportation plan, which significantly impacts the applicant’s student recruitment plan and budget. Lastly, the applicant failed to provide a comprehensive plan for renovations of its facility as well as a timeline for preparing the campus to serve its students.

The financial plan presented by the applicant provided the review committee with little evidence of a complete, realistic, and viable five-year operating budget. The budget significantly underestimated costs, omitted essential budget line items, and was misaligned within several key areas of the application narrative. Furthermore, the applicant lacked a fundamental understanding of the Basic Education Program (BEP), provided minimal evidence for how the school would manage funding for students enrolled from outside of the district, and was unable to describe how inter-district enrollment would impact the budget. In totality, the review committee was unable to find sufficient evidence of a sound financial plan for the school.

For all of these reasons, the review committee determined that the application for GAPA did not meet the requirements outlined in the rubric for each of the application’s main sections and, therefore, is unable to recommend approval of the application.

### Summary of Section Ratings

In accordance with the Tennessee Department of Education’s charter application scoring rubric, “applications that do not meet or exceed standard in every area...will be deemed not ready for approval,”<sup>7</sup> 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:

Section	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

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

## **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 it lacked a comprehensive academic focus and plan, measurable student achievement goals, and a plan to monitor student performance. Additionally, the application did not adequately describe how the school would serve its special populations and at-risk students. Furthermore, the application lacked a compelling marketing, recruitment, and enrollment plan.

First, the academic focus and plan was underdeveloped and lacked core components necessary for a successful academic program. While the applicant conveyed passion for providing a TEAMS-focused option to high school students, the application did not provide evidence of a developed technology, engineering, athletics, mathematics, and science program, including what curriculum they would use and how their plan will align with Tennessee academic standards and assessments. During the capacity interview, the applicant explained they were considering two different STEM-based curricula, IXL and one other K-12 option. However, IXL is a comprehensive personalized learning curriculum that is not STEM-specific, and, therefore, it is unclear how this curriculum choice would support the proposed academic focus. When asked about the timeline for selecting a curriculum, the applicant stated that one would be selected after administering a universal screener to students at the start of the school year. The choice to wait until after the start of the school year to select and order a curriculum would cause a ripple effect, significantly altering the current academic plan as well as the plan to train teachers on how to execute the plan. As a result, the review committee did not find evidence of a clear academic focus and plan or a proposal to support the implementation of the academic plan.

Similar to the underdeveloped academic focus and plan, the application lacked measurable student achievement goals and a means to monitor student performance. During the capacity interview, the review committee inquired about the school's most important measurable academic outcome for students; in response, the applicant identified mastery on state assessments and the ACT as the primary goals. When the review committee pressed for a specific, measurable goal, the applicant stated that 100% of the students would graduate and attend college. The applicant further explained that it would use PowerSchool to create assessments and that they may opt to administer assessments each quarter or mid-way through the quarter to determine student mastery. However, PowerSchool is a student information system, not an assessment platform. Therefore, it remains unclear with what assessments, beyond those annually required by the state, and when the applicant intends to monitor student performance.

In addition, the application lacked a viable plan to serve its special populations and at-risk students. When providing an enrollment summary within the first few pages of the application, the applicant intentionally left blank its projected percentages of economically disadvantaged students, students with disabilities, and EL students, citing that these percentages would be determined upon enrollment. During the capacity interview, when asked about the plan to serve these students, the applicant did not demonstrate a strong understanding of the legal requirements to serve special education and EL students. For example, when describing the anticipated supports for ELs, the applicant's exceptional education lead explained that the school would pull student files from EasyIEP and administer the WIDA assessment to place students. However, EasyIEP is a special education management tool and only contains data and files for students with disabilities. Additionally, the applicant was unable to

describe how the school would provide services for special populations within its daily schedule, explaining that at least one general education teacher would be certified to serve these students. The applicant does not plan to hire a full-time special education teacher or an EL teacher in Year 1 and budgeted \$0 for contracted SPED Services through Year 5. Instead, the applicant stated they would rely on general education teachers with EL and/or special education endorsements until their enrollment totals indicated a need to hire these staff members. The applicant was unable to provide the review committee with a specific enrollment number or percentage which would trigger the need to hire an EL or special education teacher.

Finally, the application lacked a compelling marketing, recruitment, and enrollment plan. The application states that the school intends to enroll approximately 20-40% of its students from within the district and 60-80% from outside of the district, specifically targeting students anywhere between Knoxville and Chattanooga. When asked for additional details about the target student population and a plan to recruit students from a variety of cities and towns throughout East Tennessee, the applicant stated they will not actively recruit students and have already generated interest in the school through word of mouth. The applicant further explained that the founder, Howard Paul Gaffney, has received national media attention because of his professional basketball experience, and that this school would provide a private-school-like option to families that cannot afford the cost of tuition. The applicant added that they expect families from across the nation will move to East Tennessee to attend the school regardless of the fact that many of these families would be low income. While the applicant would likely garner some student enrollment as a result of media attention, there is no evidence that this plan will be viable or sufficient to meet the applicant's enrollment projections.

Given the number of significant questions that remained after the capacity interview and the lack of a comprehensive plan throughout the entire academic section, the committee determined GAPA's academic plan design and capacity is insufficient and does not meet the standard established in the rubric.

## **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 the applicant did not provide a realistic start-up plan, including how the applicant would recruit and train staff. In addition, the applicant lacked a finalized transportation plan, which significantly impacts the applicant's student recruitment plan and budget. Lastly, the applicant failed to provide a comprehensive plan for renovations of its facility as well as a timeline for preparing the campus to serve its students.

First, the application lacked a realistic start-up plan and aligned budget. While the start-up plan laid out several tasks and timelines to be completed during Year 0, the application did not explain who would be responsible for the tasks or how they would be compensated. The Year 0 budget included \$60,000 for compensation and \$4,590 in benefits which contradicted the application narrative that stated a "hiring team" would be contracted for the tasks. Similarly, the start-up plan's marketing and recruitment line items conflicted with the Year 0 budget. The application narrative specified a budget of \$10,800 for marketing and recruitment, while the Year 0 budget worksheet had \$1,500 for marketing materials and no mention of any recruitment line items. It remains unclear what expenses are included in either of these totals or why the budgeted amounts do not align between the application narrative and the budget worksheet. Additionally, the applicant did not provide evidence of a plan to recruit staff, a detail that is of particular importance given the school's location in a rural community. During the capacity interview, the applicant stated that it had formed partnerships with two nearby universities to create a pipeline of new teachers and would rely heavily on word of mouth to recruit educators from across the nation. The applicant added that several of the founding board members are former athletes and former educators and who are able to teach at the school initially, if needed. While the review committee found evidence of the applicant's many connections with various organizations around the country, it remains unclear how these relationships would translate into recruitment of its staff. Additionally, there was no mention of how the school would recruit staff with STEM backgrounds in support of the academic focus or how it would recruit veteran teachers beyond a reliance on word of mouth.

Next, the applicant lacked a finalized transportation plan, which produced significant complications within the student recruitment plan and budget. While charter schools are not required to provide transportation, the review committee found little evidence that the school would be able to effectively enroll and retain students from across all of East Tennessee without a plan to provide bussing. Within the application narrative, the applicant explained that they had not yet determined if they would provide transportation and therefore did not include any transportation items in the budget. During the capacity interview, the review committee pressed the applicant team on how they would cover the cost of transportation, should they decide to offer it, as well as how the applicant would ensure the school was not in violation of T.C.A. § 49-6-2105, which sets a maximum time for students on a bus of ninety (90) minutes one way. The applicant explained that Mr. Gaffney planned to purchase the first two busses at \$10,000 a-piece and donate them to the school. Mr. Gaffney added that they would assemble a transportation committee to plan out the routes and consider different options such as smaller vans and busses to ensure they were in compliance with state law. However, the use of vans, beyond those used for the transportation of students to and from school-related activities, is not permitted and added to the mounting evidence that the applicant lacks an understanding of the significant transportation

requirements contained in state and federal law. Additionally, while the review committee acknowledges that Mr. Gaffney would cover the initial cost, without a full transportation plan, the review committee lacked evidence that the school would be able to recruit and retain its 60-80% of students from far distances such as Chattanooga and Knoxville as well as pay for its transportation costs beyond Mr. Gaffney's initial donation.

Further, the applicant's facility plan did not provide sufficient evidence that the school would be ready to open for the 2021-22 school year. According to the applicant, its sponsoring non-profit has entered into a rental agreement with the owner of the former Hiwassee College campus in Madisonville, TN. During the capacity interview, the applicant described the various inspectors and estimators who have visited the campus to provide the applicant with an understanding of the work that would need to be completed in Year 0. However, the applicant did not include any renovation timelines or anticipated costs for this work in the application. The applicant explained that several of the campus buildings would need to be changed from a business code to an education code but did not offer further details on a timeline or process for how or when this would be completed. Additionally, the application included a brief outline of the applicant's intention to rent out several portions of the facility to various community groups; however, a clear plan for the safety and security of its students while these groups were on campus was not provided. Without a comprehensive plan and timeline for renovations, any budgeted line items to cover the costs, or a clear understanding of the safety and security measures that would need to be in place to protect its students, the review committee determined that the applicant's facility plan was incomplete and insufficient.

Together, each of these concerns illustrated an operations plan that does not meet the requirements of the rubric.

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

*Rating: Does Not Meet Standard*

### **Weaknesses Identified by the Committee:**

The Financial Plan and Capacity does not meet standard because it lacked a complete, realistic, and viable five year operating budget. The budget provided by the applicant significantly underestimated costs, omitted essential budget line items, and was misaligned within several areas of the application narrative. Moreover, the applicant lacked a fundamental understanding of the BEP, providing minimal evidence for how the school would manage funding for students enrolled from outside of the district as well as how inter-district enrollment would impact budget projections. Each of these concerns amounted to a lack of compelling evidence of a sound financial plan for the school.

To start, the applicant's five year operating budget underestimated costs and omitted essential budget line items described in the application narrative, thus creating a misalignment between the financial plan, several sections within the application, and the proposed budget. For example, in addition to the facility renovation costs discussed in the analysis of the Operations Plan and Capacity above, the five-year operating budget did not include any costs for utilities or maintenance of the facility. Similarly, the application narrative referenced multiple staff positions that are not accounted for in the budget, including two (2) IT personnel, paraprofessionals, a security guard, a transportation director, and an Assistant Principal in Year 1. In addition, the budget narrative estimates that in Year 1 the school will have 10% of its population, or roughly 17 students, requiring EL services and another 10% of its population requiring special education services; however, the Year 1 budget does not include any costs for staff members to support these students.<sup>8</sup> During the capacity interview, the applicant justified this omission by explaining that the school would recruit general education teachers with the necessary endorsements to support their special populations and these teachers would be expected to teach multiple courses in order to provide the required services. Knowing that special education and EL teachers are responsible for more than simply providing services to students and that the plan relied on teachers being assigned multiple courses to teach, the review committee was concerned that the applicant did not prioritize funding within the budget to support its special populations of students and that the plan would be insufficient.

In addition, the applicant demonstrated a lack of understanding of the BEP and its impact on the budget. According to the budget narrative, the applicant used Shelby County Schools' BEP rate to determine its own per pupil funding. When asked why the applicant used Shelby County's rate rather than the BEP rate for Monroe County, where the school will be located, the applicant explained that Shelby County has charter schools and Monroe County currently does not. From there, the review committee inquired about how the various BEP rates from different counties would impact the budget. In turn, the applicant asked the review committee if the amounts would be different and then clarified that the budget is singularly based on Monroe County because it has a lower BEP rate than its surrounding counties. This clarification directly contradicted the applicant's previous statement about using Shelby County's BEP rate and pointed to a fundamental lack of understanding of the BEP, particularly knowing that the school intends to enroll between 60-80% of its students from outside of the district. Given the confusing and contradictory responses provided during the capacity interview, the review committee did not find

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<sup>8</sup> The budget narrative is the first mention of any projected counts for EL and special education students.



evidence that the applicant has a sufficient understanding of its BEP funding and, as a result, created an inaccurate budget.

In totality, the plan provided in the financial section of the application does not meet the standard explicitly stated in the rubric.



## Evaluation Team

**Michelle Doane** is an independent educational and nonprofit consultant based in Nashville, TN. Her primary areas of specialization include program development and evaluation, charter school development, charter school authorization, school and authorizer quality, strategic planning, and project management. Recent clients include the Walton Family Foundation, the Maryland State Department of Education, the Louisiana Department of Education, and the Indiana Department of Education. Michelle previously served as the Project Manager in the Vice Chancellor's Office for Equity, Diversity, and Inclusion at Vanderbilt University, and as the Director of School Development Programs at the Tennessee Charter School Center. She holds an Master of Education degree in learning and instruction from Peabody College, Vanderbilt University.

**Chad J. Fletcher** is the Federal Programs Supervisor and District Testing Coordinator for Bedford County Schools. Chad began his career as a high school History and Geography teacher in Metro-Nashville/Davidson County Schools. After gaining valuable classroom teaching experience, Chad served as a school and district administrator for 18 years in Murfreesboro City, Knox County, and Manchester City Schools before joining Bedford County in July 2019. Chad earned his Bachelors, Master of Education, and Educational Specialist degrees from Middle Tennessee State University and previously served on the Tennessee Department of Education's Personalized Learning Taskforce.

**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 7<sup>th</sup> and 8<sup>th</sup> 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 a Teach For America alum with a decade of experience in Education. Ali has taught in and led charter schools in Nashville and New Orleans and loves the innovation and quality education opportunities charter schools provide. Ali earned her Bachelor of Arts degree at the University of Florida.

**Nate Parker** serves as the Coordinator of Policy and Federal Programs for the Tennessee State Board of Education. In this role, he manages local education agency (LEA) compliance and federal programs for State Board authorized charter schools. He is also currently enrolled in Vanderbilt University's Doctor of Education program in K-12 Education Leadership and Policy. Nate is a former Teach For America alum with a decade of experience as a secondary teacher, assistant principal, and principal working in traditional public schools and charter schools in Arizona, Connecticut, Ohio, and Tennessee. He is twice a graduate of The Ohio State University, earning a Bachelor of Arts degree in Integrated Social Studies and a Master of Public Administration degree. Nate is also a graduate of Arizona State University earning a Master of Education degree in Secondary Education.



## Exhibit B

### Section 1 Academic Plan Design and Capacity

<b>1.1 School Mission and Vision</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>▪ The mission statement defines the purpose of the proposed charter school.</li> <li>▪ The mission statement is clear, concise, compelling and measurable.</li> <li>▪ The vision provides a coherent description of what the school will look like when it is achieving its mission.</li> </ul>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
Plan stated mission and goals.		1
<b>Concerns/Questions</b>		<b>Page</b>
Initiatives are unclear. There seem to be several competing ideas.		
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
This application has an innovative concept.		
<b>Concerns/Questions</b>		<b>Page</b>
Mission and vision are somewhat unclear. Is this a STEM Academy? Is this an athletic academy? There are many different initiatives - the target population and focuses are inconsistent. The application should include additional content to describe the implementation of innovative practices concerning a specialized academic sports curriculum.		1-3

<b>1.2 Enrollment Summary</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>▪ A clear description of the communitywhereschoolintendstodrawstudentsincluding schoolzonesandacademic performance of surrounding schools.</li> <li>▪ Rationaleforselectingthecommunitywhereschoolwilllocateanddescriptionofhowtheschoolwillserveasaneeded alternative.</li> <li>▪ Completed enrollment summary and anticipated demographics charts with reasonable enrollment projections.</li> </ul>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
Data included in the application are both inaccurate and inconsistent. Percentages of economically disadvantaged, students with disabilities, and English Learners students are unable to be predicted prior to actual enrollment. Graduation data is inaccurate. The dropout rate is reported as 22% and the Monroe County School System has a graduation rate of 93%.		3-6
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
The percentages of students who will be economically disadvantaged, students with disabilities and English Language Learners could not be predicted - where are these numbers coming from? Class size ratios are inadequately staffed and inconsistent - this does not correlate with the budget. Enrollment plans are predicted to be extremely higher than any other existing charter school in the state. Monroe County is a rural community, and a new school starting with 175 9th graders and ultimately having 800 students is not likely.		6 & 7

Section 1 Academic Plan Design and Capacity

<b>1.3 Academic Focus and Plan</b>
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Characteristics of a strong response:

- A clear and comprehensive explanation of the school's academic focus that is aligned with the school's mission and vision.
- A framework for a rigorous research based academic plan that reflects the needs of the targeted student population and is aligned with the school's stated mission and vision.
- A robust and quality curriculum overview, supported by research, with a plan for implementation that includes all grades the school will eventually include.
- Evidence the curriculum design is aligned with the Tennessee State Standards.
- Evidence the proposed academic plan will be appropriate. And effective for growing. All students while at. The same time closing achievement gaps.
- A description of effective methods for providing differentiated instruction to meet the needs of all students, including a strong plan for Response to Instruction and Intervention (RTI2) that aligns with Tennessee guidelines.
- If including blended learning, a clear explanation of the model the school will use and the role of teachers within the blended learning environment.

**Initial Application Review**

Meets or Exceeds Standard     Partially Meets Standard     Does Not Meet Standard

**Strengths**

**Page**

The application highlights a plan to adopt Tennessee State Standards.

**Concerns/Questions**

**Page**

Academic plan fails to specify innovative strategies in regards to athletics but instead includes a variety of concepts such as STEM, leadership, aviation, college preparatory coursework, dual enrollment, Advanced Placement, agriculture etc. The application needs one focus. These focuses are available at the existing Monroe County high schools and would not provide students with additional options.

8-12

**Final Application Review**

Meets or Exceeds Standard     Partially Meets Standard     Does Not Meet Standard

**Strengths**

**Page**

**Concerns/Questions**

**Page**

The application is redundant in nature with multiple sections repeating the same content, at times with different details, models, or what appeared to be excerpts from other documents.

The integration of restorative practices into the classrooms is mentioned in this section (p. 9), but is not further elaborated or mentioned in the discipline section. The same applies to social-emotional learning. A reference to the "virtual part of a blended learning program" is mentioned (p. 12), but is not included in the staffing needs (IT) or curriculum needs. These expenses are also not reflected in the budget.

Many of the programs, strategies, platforms and curricular resources are not research-based, high-quality or related to standards.

The flex-blended learning model (p. 16) is not included in the budget - year one (175 students) would have a minimum of \$200,000 for devices plus the cost of developing the infrastructure for networking.

8-18

<p>This expense would recur each year for the additional student enrollment.</p> <p>Duties for the Classroom Coaches (p. 17-18) are unrealistic - it appears that there are multiple job responsibilities placed on classroom coaches. Does the compensation align with job duties and expectations? Are these separate positions (classroom instruction and planning, data analysis, content creation, discussion boards and blogs, etc.)</p> <p>Response to Intervention - specific requirements are not included or sufficient. Interventions must be research-based. Who will be providing interventions? This is a personnel requirement that is not included in the budget.</p>	
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Section 1 Academic Plan Design and Capacity

<b>1.4 Academic Performance Standards</b>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>

<b>Concerns/Questions</b>		<b>Page</b>
<p>The application does not outline measurable goals for student achievement.</p> <p>The research cited is outdated and at times sources referenced are not valid.</p> <p>Numerous staff members are outlined in this section's narrative but are not included in the budget.</p> <p>References to instructional strategies and content for elementary and middle schools also seem to be cut and pasted from another source and are not applicable to high school. Several of the included tables and examples are not current or relevant.</p>		22-42
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
<p>In the application, Figure 9 (p. 23) is not a valid source or reference.</p> <p>The research on p. 24 is outdated (2002) and assessment reference is not current.</p> <p>Instructional references (p. 25) are not appropriate for high school students - research cited pertains to grades two and four.</p> <p>Homework recommendations are not appropriate or realistic - this should not be a blanket recommendation considering commute times, sporting events, practices, etc.</p> <p>Again, RTI sections on p. 28 and 38 are not aligned with the current Tennessee RTI2 model - language of the current RTI2/RTII is outdated, identification of students who need services, benchmark requirements, allowable universal screener, and other mandates are not included.</p> <p>Group sizes are confusing - The size of 22 students is referenced as a small group and a large group. Further, during specials and lunch periods staffing assignments are not logical.</p> <p>The plan for adopting materials and curriculum is not consistent with Tennessee's ELA initiatives.</p> <p>Are the positions of commissioner, curriculum implementation coordinator, academic commissioner, and founding board leaders separate positions? These salaries are not included in the budget.</p> <p>Additional staff are mentioned on p. 38 - again the budget does not support these positions.</p> <p>Reading Plus, IXL, Mavis Beacon Teaches Typing are listed on p. 42-43 as online programs to be used, but the cost of those subscriptions is not included in the budget.</p> <p>Prentice Hall Writing and Grammar (p. 42) is an outdated curriculum.</p>		<p>23</p> <p>24</p> <p>25</p> <p>26-27</p> <p>28 &amp; 38</p> <p>33, 35</p> <p>38</p> <p>42-43</p>

The use of any curriculum as a primary resource not approved by TDOE requires an extensive waiver process that is not included in the narrative.	42
Tennessee requires a tiered attendance and truancy plan. GAPA does not include a plan that would meet state requirements. The various electives look good, but would require many different staff members and additional expenses related to equipment and transportation.	43

## Section 1 Academic Plan Design and Capacity

<b>1.5 Phase-In/Turnaround Planning</b>
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> <li>• Inclusion of strong prior experience in turning around or converting an underperforming school or plan for doing so if the organization does not have prior experience.</li> <li>• A clear explanation for how the organization will engage with the neighborhood, community, and student population prior to conversion.</li> <li>• Specific ways to engage and transform the existing school culture and how the organization will determine what aspects of school culture to keep, modify, or add.</li> <li>• If proposing a phase-in approach, the organization clearly describes how transition to a shared campus will occur with regard to campus collaboration and building-wide issues.</li> <li>• If proposing a full school take-over approach, the organization has a clear plan for communicating with existing staff and a comprehensive plan for needed additional support to ensure student success.</li> </ul>

<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
Not included in application because the applicant is not phasing in the school.		
<b>Concerns/Questions</b>		<b>Page</b>
This section was not included because the applicant is not doing a conversion. However, the applicant does not have experience with opening a school, school conversion or turning around a school.		
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>

### Section 1 Academic Plan Design and Capacity

<b>1.6 High School Graduation and Postsecondary Readiness</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>• Plan for meeting the Tennessee Graduation Requirements (including credits, transcripts, electives, GPA calculation) and compelling explanation of any additional requirements beyond the State's requirements.</li> <li>• Clear, persuasive explanation of how the school's graduation requirements will ensure student readiness for college or other postsecondary opportunities, including trade school, military service, or entering the workforce).</li> <li>• Effective systems and structures for students at risk of dropping out or not meeting graduation requirements.</li> </ul>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard

<b>Strengths</b>		<b>Page</b>
The application has a wide variety of concepts for students to be college and career ready.		
<b>Concerns/Questions</b>		<b>Page</b>
This section shows a lack of basic understanding of high school programs, course codes and scheduling best practices. The application seems to completely ignore relaying specific innovative curricular designs in athletics. The application includes sports career studies, however it does not include students' athletic participation in team sports as a course or in their daily schedules.		49-50
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
The SEPOD (Senior Exit Project and Oral Defense) is a commendable practice for college and career readiness.		51
<b>Concerns/Questions</b>		<b>Page</b>
<p>Details regarding students' practicum experiences are missing.</p> <p>Outdated references for graduation requirements are listed on p. 48.</p> <p>The ACT is not listed as a graduation requirement.</p> <p>Credits required for graduation are inconsistent (22 v. 26).</p> <p>Saturday School is referenced as an option for students on p. 51. Is staffing for this included in the budget?</p> <p>Course offerings are ambitious; however, many special course codes would have to be applied for and a large number of teachers with multiple certifications/endorsements/training would have to be available.</p> <p>AP courses are listed which would be additional expenses not included in the budget for the exams and teacher training.</p> <p>Partnerships for dual enrollment require articulation agreements with each college/university and course. There is not a provision or evidence of agreements included in the initial application for any of the listed schools (Cleveland State Community College, Tennessee Wesleyan University, Lee University). The University of Chattanooga is also listed, but is not an actual school. Instructors for dual enrollment courses must have degrees in each course and be approved by the college or university. Additionally, there are great costs associated with dual enrollment that are not included in the budget and no specific plan for obtaining the requirements or paying for each course.</p> <p>Available staff at GAPA does not have all the appropriate qualifications to teach dual enrollment and AP courses.</p> <p>Aquatics is listed as a course, however there is not a functioning pool on campus. This applies to multiple courses and facilities such as</p>		46-82



weight training, tennis, etc. Currently, none of the facilities are usable according to the most recent Fire Marshall reports.	
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**Section 1 Academic Plan Design and Capacity**

<b>1.7 Assessments</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>• Assessment selection will provide sufficiently rich data for evaluation of the academic program and align with state standards.</li> <li>• Assessment plan details the collection and analysis of individual students, student cohorts, and school level performance throughout the school year, at the end of the academic year and for the term of the charter.</li> <li>• A process for using data to support instruction is clearly articulated, with detailed plans presented to provide adequate training for teachers and school leaders.</li> <li>• Demonstrates an understating of the obligation under state law to participate in the statewide system of assessments and accountability.</li> </ul>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
The applicant understands TDOE's required assessments for all students using the TCAP/EOC TNReady Assessment Program.		

<b>Concerns/Questions</b>		<b>Page</b>
Required assessments for special populations are not included in the assessment section.		82-86
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
<p>If GAPA chooses to participate in supplemental district-wide assessments, that would be an additional cost and is not reflected in the budget.</p> <p>Required assessments for special populations (ELs, SWDs) are not included in the assessment section.</p> <p>The application lacks a comprehensive approach to assessment which would include diagnostics, formative and summative assessments.</p>		82-86

**Section 1 Academic Plan Design and Capacity**

<b>1.8 School Calendar and Schedule</b>		
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> <li>• School calendar (Attachment A) and student schedules meet Tennessee minimum requirements of the equivalent of 180 days of instruction.</li> <li>• Calendar and schedule support implementation of the academic plan and align with stated mission and vision.</li> <li>• Description of a typical day for teachers and students align with key priorities of the academic plan and the overall mission and vision for the school.</li> <li>• If proposing Saturday School, summer school, or after school programing, a description of programing is included</li> </ul>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>

<p>Given the proposed academic plan and schedule, how would students be able to focus on their athletic endeavors playing a team sport or multiple sports at a competitive level while maintaining full-time classroom hours with rigorous in-person courses, 90-120 minutes of homework every night, tutoring, up to a 3-hour commute on a bus (maximum daily time allowed), and the practice and conditioning for their sports?</p>		
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
<p>Who manages the enrollment processes? This is not included in the budget.</p> <p>Class sizes and total enrollment do not add up (p. 86). The first year will just include 9th graders, but that is unclear in this section. Once enrollment is at the maximum of 800 students, where will the classrooms be located? The facilities do not support these numbers. Fire code requirements do not allow for that many students in the academic buildings.</p> <p>Another inconsistent grouping of students is included on p. 87 - small groups of 10 sports enthusiasts. Other sections describe a small group as 15-22 students.</p> <p>Supplemental Educational Services is no longer an applicable program requirement. (p. 87)</p> <p>The typical week schedule includes a full faculty/department meeting, however the block schedule does not reflect that. Will the students only attend four days per week? When are the full faculty/dept. meetings?</p> <p>Are the sports university courses allowable special courses in Tennessee?</p> <p>Is the lunch/RTI block (11:45-1:10) providing adequate time for RTI and lunch per Tennessee's RTI<sup>2</sup> plan?</p> <p>When considering travel times for athletic events (teams will be traveling long distances to tournaments and competitions), how will that time be considered in this daily schedule? How will students' academic requirements be met, especially for RTI<sup>2</sup>/special education/ESL?</p> <p>AdvancEd is no longer an accreditation organization. It is now Cognia and is another cost not reflected in the budget.</p> <p>Monroe County City Public Schools is a mistake (p. 90).</p> <p>The application references a transition from SA Fifteen to Infinite Campus - neither of those is correct. Further, the Monroe County Schools district is unable to provide training or staff to manage the SIS (Student Information System).</p>		86-92

<p>The personnel data reporting referenced on p. 91 are not current reporting requirements. The GAPA human resources and data management personnel will be responsible for any staff reporting requirements.</p> <p>The Monroe County Schools course files do not align with the GAPA course catalog since there are several special courses that would require state approval therefore, GAPA would be unable to transfer the courses and descriptions in the SIS.</p> <p>The Infinite Campus section is inaccurate. Monroe County has never used this system.</p> <p>Staff responsible for maintaining and reporting accurate data are inadequate and not included in the budget.</p>	
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**Section 1 Academic Plan Design and Capacity**

<b>1.9 Special Populations and At-Risk Students</b>		
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> <li>• An identified founding school team member with experience working with special populations.</li> <li>• Clear process for identifying students with disabilities, English Language Learners, and at-risk students, and gifted students.</li> <li>• Clear description of RTI<sup>2</sup> procedures, including a plan for how data will be collected, progress will be monitored, and instructional decisions made related to student performance</li> <li>• A viable plan to provide students with special needs with instructional programs, practices, and strategies that ensure access to the general education curriculum and academic success.</li> <li>• Requirements and processes for monitoring services to students in need and plans to exit students that attain sufficient progress.</li> <li>• An understanding of, and capacity to fulfill, State and federal obligations and requirements pertaining to students with disabilities and English Language Learners.</li> <li>• A realistic plan for hiring licensed and highly qualified personnel including service providers, nursing, and educational assistants.</li> <li>• Evidence of adequate resources and staff to meet the needs of all students, including professional development for teachers.</li> <li>• Articulated plan for how the school will utilize and evaluate data to inform instruction and evaluate academic progress for students with disabilities, English learners, at-risk students, and gifted students.</li> </ul>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
One proposed Team member listed in the application has experience and endorsement in Special Education.		95

<b>Concerns/Questions</b>		<b>Page</b>
<p>This application demonstrates lack of basic knowledge concerning students with special needs and the laws protecting them. Tennessee's current RTI<sup>2</sup> Plan (Response to Instruction and Intervention) is incorrectly referenced throughout the document as RTI (Response to Intervention), which is an outdated term. In multiple places in the application, there is a wide variety of methods and programs listed for "RTI" that do not specifically outline a usable plan for identifying, intervening and monitoring students who require RTI<sup>2</sup> services.</p>		
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<p>There is evidence of a willingness to plan for students with special needs to attend the GAPA Charter School.</p>		
<b>Concerns/Questions</b>		<b>Page</b>
<p>Supervision and provisions of IDEA, ADA, and Section 504 services are the responsibility of the Charter unless they decide to contract with the LEA. These expenses are not included in the budget. The LEA has an identified challenge meeting the existing staffing needs for the Exceptional Education Department and would be unable to provide contracted services to the GAPA Charter School. The application lists multiple staff members with experience working with special populations, however only one is currently certified or endorsed. Are these potential instructors or administrators or just founding board members? (p. 94-96)</p> <p>EasyCBM is listed as another progress monitoring program in this section. This is inconsistent with previously mentioned RTI<sup>2</sup> plans as well as an additional cost not listed in the budget.</p> <p>EasyIEP is listed as a system to manage student progress, however that is an add-on expense that is not included in the budget.</p> <p>A special education assistant is listed on p. 96 but is not included in the budget.</p> <p>The application lists CPI (Crisis Prevention Institute) training as an option for staff, which is an extensive and expensive process not included in the budget. p.96</p> <p>Identification of students with special needs is missing required steps in the process such as initial identification. Case managers are required to have an IEP meeting for transfer students coming in with existing IEPs from other districts and the application does not indicate this requirement or process. (p. 97-98)</p> <p>There are several missing pieces of the IDEA/SWD requirements within the application.</p>		92-102

<p>Counselors, a full-time nurse and case managers are listed on p. 97 and are not included in the budget.</p> <p>For ELs, a translator service is not referenced (additional cost not listed in the budget) and a certified ESL teacher is required for all identified English Learners (additional cost not listed in the budget).</p> <p>RTI programs are mentioned again on p. 101 - this is redundant and has been mentioned in multiple places with inconsistent plans.</p> <p>Gifted services are not adequate or appropriate for students identified as gifted. (p. 102)</p>	
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**Section 1 Academic Plan Design and Capacity**

<b>1.10 School Culture and Discipline</b>		
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> <li>• A clear vision for school culture or ethos that will promote a positive academic environment and will reflect high levels of academic expectation and support.</li> <li>• Coherent plan for creating and sustaining the intended culture for students, teachers, administrators, and parents from the school's inception, and for integrating new students and families as they arrive.</li> <li>• Plan for how school culture will embrace students with special needs.</li> <li>• Student discipline policy (Attachment B) that provides for effective strategies to support a safe, orderly school climate and strong school culture while respecting student rights.</li> <li>• Evidence of legally sound discipline policies that outline discipline procedures, suspension, and expulsion procedures and appeals processes.</li> <li>• If not included as part of school handbook (Attachment B), inclusion of student discipline policy (Attachment C)</li> <li>• Thoughtful consideration of how the discipline policies protect the rights of students with disabilities.</li> </ul>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
<p>The beginning of this section cites a great deal of research but little to no practical application was described. Strategies were listed (p. 106) in place of the actual development of a school culture. There was no mention of culture building practices or activities or even branding with mascots or school colors with potential stakeholders. There is a graphic with a coat of arms and motto that was pre-established in another business endeavor (2018) that does not encourage ownership from prospective students or communities.</p>		

Restorative practices and a need for Social-Emotional Learning were listed in the very beginning of the application but not included in the culture and discipline section.		
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
<p>Alternative school is listed as a consequence for many offenses - this is an additional expense not included in the budget. Where would the alternative school be located given the current conditions of the campus?</p> <p>Alternative school, in-school suspension, after-school detention, and Saturday School are all listed as consequences. Who will staff those? These are additional expenses not included in the budget. How will athletes complete additional required hours while in season? Are there consequences related to team eligibility for students who have disciplinary issues?</p> <p>A full-time SRO is included and the application states that the Monroe County Sheriff's office will provide the SRO at no cost to the school. The Monroe County Sheriff will not actually provide this position and this is not included in the budget.</p> <p>Many offenses are planned to be reported to law enforcement, which is neither practical nor necessary. Further, restorative practices and social-emotional learning needs are not addressed in the discipline section.</p>		103-114

## Section 1 Academic Plan Design and Capacity

<b>1.11 Marketing, Recruitment, and Enrollment</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>Articulated student recruitment and marketing plan, timeline, and enrollment policy that will provide equal access to all interested students and families, including those in poverty, academically low-achieving students, students with disabilities, and English Language Learners.</li> <li>Enrollment policy (Attachment D) that complies with state law and district policies.</li> <li>Compelling student outreach plan that includes community, family, and student involvement, and that is realistic and likely to foster student retention and community support.</li> <li>Description of existing community resources and partnerships already formed that will benefit students and parents and that include a description of the nature, purposes, terms, and scope of services of any such partnerships; and evidence of commitment from identified community partners including documentation of pledged support (Attachment E), if available.</li> <li>Letters of support, MOUs, or contracts (Attachment E) to show proposed school is welcomed by the community.</li> </ul>		
<b>Initial Application Review</b>		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
All required components of the application are included.		114-119
<b>Concerns/Questions</b>		<b>Page</b>
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
How will extensive travel be funded for recruitment and publicizing? The application says that recruitment will be conducted		



<p>nationally. Is this going to be advertised as a boarding school? If so, how will that be funded? Further, international recruiting would require adherence to federal requirements (Homeland Security, immigration) Oversight, safety concerns, meals, utilities, dorm supervision - all are additional funding issues not included in the budget.</p> <p>Are recruitment practices planned and appropriate/legal under TSSAA and NCAA regulations?</p>	
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**Section 1 Academic Plan Design and Capacity**

<b>1.12 Community Involvement and Parent Engagement</b>		
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> <li>• Plan for student recruitment after school has opened.</li> <li>• A sound and compelling plan for engaging parents and community partners in the design and life of the school.</li> <li>• Clear plan for informing and educating parents on school policies.</li> </ul>		
<b>Initial Application Review</b>		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
The required components of the application are included.		119-130
<b>Concerns/Questions</b>		<b>Page</b>
Given the large geography covered by the anticipated school enrollment plans, GAPAs may have great challenges with parent involvement and attendance at school events.		
<b>Final Application Review</b>		
<input checked="" type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
There are robust plans to include and inform parents.		
<b>Concerns/Questions</b>		<b>Page</b>
A parent partnership specialist and a family resource center are listed as positions. These positions are not included in the budget.		

Section 1 Academic Plan Design and Capacity

<b>1.13 Existing Academic Plan</b>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
Not Applicable		
<b>Concerns/Questions</b>		<b>Page</b>
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>

Section 1 Academic Plan Design and Capacity

<b>1.14 Performance Management</b>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
Not Applicable		
<b>Concerns/Questions</b>		<b>Page</b>
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>

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## Section 2 Operations

<b>2.1 Governance</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>• Strong understanding of the roles and responsibilities of a governing board including structure, size, powers, duties, and expertise that aligns with the school's mission and vision.</li> <li>• Proposed structure is likely to ensure effective governance and meaningful oversight of school performance, operations, and financials.</li> <li>• Evidence the proposed board members will contribute the wide range of knowledge, skills, and commitment needed to oversee a successful charter school, including but not limited to educational, financial, legal, and community experience and expertise.</li> <li>• Plans for meaningful board training as required by law.</li> <li>• If applicable, a timely plan for creating or transitioning from a founding board to a school governing board.</li> <li>• Clear, compelling plans to ensure parents have access to the governing board, including a process for complaints that is fair, transparent and a plan for communicating the process.</li> <li>• Sound plan and timeline for board recruitment, expansion and orientation of new members.</li> <li>• Governance documents (Attachments F1-F7) are complete and align with state laws and district policies.</li> </ul>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
The Board of Directors lack experience in the field of education or charter school administration. There are seven Board Members and ten "founding board" listed. What are their roles? It is unclear who of these individuals has experience in governance versus day-to-day management of a school or charter.		131
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
Board development (p. 133) should include training for the board members, parliamentary procedures, and board responsibilities. Unscheduled meetings have to be publicized at least 48 hours in advance (p. 134)		131-135

The application mentions an audit, but does not have funds in the budget for auditor services.	
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**Section 2 Operations**

<b>2.2 Start-Up Plan</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>• Compelling plan for leading the development of the school from post-approval to opening, including identification of a capable individual or team to lead the planning and start-up, as well as a viable plan for compensating this individual or team during the planning year.</li> <li>• Adequately addresses potential challenges.</li> <li>• Detailed start-up plan specifying tasks and timelines which are aligned with a sound start-up budget.</li> </ul>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
A timeline for the startup year was developed with activities listed for each month, however specificity for how this plan would be executed was not included.		135-137
<b>Concerns/Questions</b>		<b>Page</b>
The application was unclear about the number of positions, compensation packages, and budget support for the startup. It is unclear how the number positions listed will be adequate for the multitude of responsibilities and activities necessary to get the school fully prepared for students to attend. There are concerns about the expertise of named or unnamed staff to open and operate the charter.		
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
The start-up plan includes at least seven positions that would cost at least \$450,000 (averaging \$65,000 per employee including salaries and benefits) - with the additional staff listed throughout the application there is approximately \$1,000,000 in staff salaries. This total is not included in the budget for the startup year. Parts of the start-up plan are not logical. For example, students could not be assessed (diagnostic testing) and IEPs could not be developed before students actually start school. Research has concluded that the campus renovations would take much longer than the proposed three-month timeline stated in the		135-140

<p>startup plan. At this time, none of the buildings are usable even for office space.</p> <p>The Team Captain of sports enthusiasts is listed as a school administrator, school counselor, and social worker supervisor. That individual would have multiple certifications to qualify for each of these positions. Moreover, many of the positions listed would have to perform multiple job duties including administrative, instructional, coaching, student services, etc. There is a lack of detail in the budget for compensation for these additional duties.</p>	
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## Section 2 Operations

<b>2.3 Facilities</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>• Facility plans are reasonable and adequately meet the requirements of the educational program and anticipated student population.</li> <li>• A sound plan and timeline for identifying, financing, renovating, and ensuring code compliance for a facility.</li> </ul>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
<p>The facility chosen for the GAPA Charter School is completely inappropriate and currently unusable per Fire Marshall reports. The buildings are padlocked and cannot be used for any reason without extensive renovations.</p> <p>The application lacks a contingency plan for operating the charter school while facilities are brought up to code compliance.</p> <p>The application does not show any financial plan for the millions of dollars that would be required to renovate the buildings and grounds indicated for use in the application.</p>		141-142
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
<p style="color: red;">At present time, none of the buildings on campus are allowed to be used per the Fire Marshall inspection report. In fact, buildings were padlocked. Extensive work is required to make the buildings accessible and compliant with fire codes. The costs to bring the facilities up to all codes (fire, ADA, electrical, sanitation, etc.) would indicate millions of dollars in repairs and updates for the safety of children and staff.</p> <p>There is inconsistent language in the application regarding the purchase and renovations for the campus and buildings. The application has indicated there will be one full-time and one part-time maintenance worker and one full-time security guard. The salaries are not included in the budget. Further, this does not include maintenance and repairs for machinery, tools, lab equipment and vehicles.</p> <p>An estimate for the maintenance of the grounds was obtained for the campus at \$200,000 per year (290+ acre campus with 60 acres to mow and maintain)</p>		

<p>Parking lots (paving and lighting) are in major disrepair and would have to be repaired or replaced prior to use for safety issues. (Asphalt costs approximately \$13 per square foot - varies based on fuel cost. To repair the parking lots would cost well over a million dollars.)</p> <p>There are many HVAC, electrical and plumbing issues that would all have to be repaired or updated prior to use of the buildings. All life safety codes would have to meet current regulations as the facility is under new ownership and cannot be grandfathered in to meet expectations.</p> <p>The baseball field, softball field, tennis court, and swimming pool are in disrepair and overgrown. The gymnasium is currently unavailable for use due to Fire Marshall restrictions (padlocked).</p> <p>Fire drill plans are not sufficient. Monthly fire drills (11 per year) are required as well as four fire safety educational announcements (TDOE requirements). There are also additional requirements such as tornado drills, intruder/lockdown drills that are not mentioned in the application.</p> <p>Previously, Hiwassee College employed five full-time maintenance staff (maintenance and mowing) and one full-time custodian for each building except Barker Learning Center, which had two full-time custodians.</p> <p>GAPA plans to use 237,960 square feet of facility space. At an average of \$100 per square foot for renovations, it is estimated that the repair costs would be over \$24,000,000. This does not include basic furnishings. (Each classroom costs approximately \$100,000 to furnish and this is not included in the budget even though it is included in the narrative.)</p> <p>Nothing is included in the budget for utilities.</p> <p>This campus would need lots of repairs and restoration to ensure the safety and security of students and staff.</p>	
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2.4 Personnel/Human Capital

<p style="text-align: center;"><b>2.4 Personnel/Human Capital</b></p> <p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> <li>• The schools organizational charts (Attachment G) clearly delineate the roles and responsibilities of – and lines of authority and reporting among – the Board, staff, any related</li> </ul>
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bodies (such as advisory bodies or parent/educator councils), and any external organizations that will play a role in managing the school.

- If leader is identified, chosen leaders have necessary qualifications, competencies, and capacity for their assigned roles and resumes for school leadership are included (Attachment H). If available, includes previous student achievement data for school leadership (Attachment H). NOTE: If school leader has not been chosen, a clear description of qualifications, expectations, responsibilities and timeline for hiring is included.
- Identifies strategies for supporting school leadership.
- Recruitment and hiring strategy, criteria, timeline, and procedures are likely to result in a strong staff and are well suited to the school.
- Compensation packages are likely to attract and retain strong staff are clearly defined.
- Provides a strong plan for supporting, developing, and annually evaluating school leadership and teachers that aligns statewide evaluation requirements.
- Effective planning for unsatisfactory leadership/teacher performance and turnover.
- Employee manual and personnel policies (Attachment I) are complete and effective.
- Staffing projections for each year are robust and aligned with the educational program and conducive to the school's success.

#### Initial Application Review

Meets or Exceeds Standard     Partially Meets Standard     Does Not Meet Standard

#### Strengths

#### Page

The organizational chart is included and clear.

143

#### Concerns/Questions

#### Page

The Commissioner (school leader) lacks a teaching degree or certification and lacks experience in the school leadership capacity. The teacher and administrator evaluation processes are thorough, however strategies specific to teacher retention are absent.

Attachment F

144-185

#### Final Application Review

Meets or Exceeds Standard     Partially Meets Standard     Does Not Meet Standard

#### Strengths

#### Page

#### Concerns/Questions

#### Page

Personnel responsibilities are both inconsistent and unrealistic. There are 18 people included in the organizational chart (Attachment G), which would be approximately \$1,170,000 in salaries and benefits (averaging \$65,000 per person, which is not a competitive salary). This is not reflected in the budget. Compensation packages for instructional staff are not competitive for the state or region.

143-185

### Section 2 Operations

#### 2.5 Professional Development

Characteristics of a strong response:

- Professional development standards, opportunities, leadership, and calendar/scheduling effectively support the education program and are likely to maximize success in improving student achievement.



<ul style="list-style-type: none"> <li>Thoughtful plan for professional development in the areas of special education and English Language Learners, including implementation of IEP's, discipline of students with disabilities and communication with ELL families.</li> <li>Professional development plan supports professional growth, generates collaboration, and cultivates future leadership.</li> </ul>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
There are various professional development activities included in the application for teaching staff. The application outlines 150+ hours of professional development, however the logistics and financing of these activities are not evident.		185-189
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input checked="" type="checkbox"/> Partially Meets Standard	<input type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
Costs associated with teacher professional development are not included in the budget.		

## 2.6 Insurance

<b>2.6 Insurance</b>
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> <li>Plan to secure comprehensive and adequate insurance coverage, including worker's compensation, liability, property, indemnity, directors and officers, automobile, sexual abuse and any other required coverage.</li> <li>If applicable, additional liability for such activities as sports teams.</li> </ul>

<ul style="list-style-type: none"> <li>Insurance company letter (Attachment J) states required coverage will be provided upon approval of the charter school application.</li> </ul>		
<b>Initial Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
<b>Concerns/Questions</b>		<b>Page</b>
Funds for insurance and legal services are not budgeted. Quotes are included for health insurance in the attachments section, but not for worker's compensation, adequate liability and other required policies.		189-190

Section 3 Operations

<b>2.7 Transportation – If Applicable</b>
Characteristics of a strong response: <ul style="list-style-type: none"> <li>Clear description of transportation plan that includes anticipated routes, extracurricular activities, and Saturday school where applicable.</li> <li>A comprehensive oversight plan that identifies school staff responsible for this oversight.</li> <li>Description of how the school will arrange transportation for special needs students where necessary.</li> </ul>

<ul style="list-style-type: none"> <li>Demonstrated familiarity with state and federal regulations relating to provision of transportation services to students.</li> </ul>		
<b>Initial Application Review</b>		
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<b>Strengths</b>		<b>Page</b>
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<p>Anticipated routes are not included other than "outside the LEA," which is undefined. The school plans to be an athletic academy, however transportation to sporting events or other extracurricular activities is not included.</p>		190-192
<b>Final Application Review</b>		
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<p>GAPA is expecting 20%- 40% of enrolled students will live in the LEA and those students will not be transported by GAPA. This indicates that GAPA will provide transportation to 60%-80% of their students from outside of the LEA. GAPA is planning on using two regular buses and two activity buses. These vehicles are not included in the budget. There are multiple concerns with this plan. Students should not be on a bus for more than 90 minutes per route. It is unrealistic that buses could travel very far from the campus to many locations outside of the county in the appropriate amount of time.</p> <p>The first year, there is a need to transport 105 to 140 students per day from a wide geographic area. Considering the different directions buses would travel, it is not feasible to think that students could be transported in the allotted time with only four vehicles. This number would double for year two, increase again in year three and four.</p> <p>The plan mentions that "team ops" will be working aggressively to do the heavy lifting around transportation - what does this mean?</p> <p>Bus maintenance and registration (taxes, tags) are not included in the budget.</p> <p>Monroe County Schools would be unable transport students to GAPA.</p>		190-192

Standard 2.8 Food Services

<b>2.8 Food Services</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>• A clear description of how the school will offer food service to all students, adhering to all nutritional guidelines.</li> <li>• A plan to collect free and reduced price lunch information, including procedures to receive reimbursement.</li> <li>• A plan to ensure compliance with applicable state and federal regulations.</li> </ul>		
<b>Initial Application Review</b>		
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The plan indicates that the charter will be a part of a Community Eligibility Provision (CEP), which the LEA does not qualify for. The cafeteria facilities currently are not usable and will require renovations prior to use and prior to USDA approval. These renovations are not included in the budget.		192
<b>Final Application Review</b>		
<input type="checkbox"/> Meets or Exceeds Standard	<input type="checkbox"/> Partially Meets Standard	<input checked="" type="checkbox"/> Does Not Meet Standard
<b>Strengths</b>		<b>Page</b>
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USDA Application would only pay approximately half of the county's Nutrition Supervisor salary and nothing for a chef or nutritionist. Meals for field lessons (p. 150) could not be provided at no cost for all students under USDA guidelines. The Monroe County School System does not qualify for Community Eligibility Provisions (CEP) therefore GAPA will not qualify. Students would have to complete a free/reduced lunch application to determine individual eligibility. The food services section says that GAPA will maintain communication with the McMinn County cafeteria manager. The applicable LEA is Monroe County.		192

Section 2 Operations

<b>2.9 Additional Operations – If Applicable</b>
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> <li>• Detailed plans for use of technology within the classroom and for state assessments.</li> <li>• Provides compelling data management plan that includes communication strategies for parents.</li> <li>• Demonstrates understanding of health and safety requirements that includes a plan for hiring a registered nurse for creating individual health plans as required by law.</li> <li>• Detailed safety and security plans for students, staff, guests, and property.</li> <li>• Provides detailed maintenance plan for school facilities.</li> <li>• If school plans to contract with a CMO, describes rationale and process for selecting CMO and explanation of why the CMO is a strong choice and good fit for the proposed school and community.</li> <li>• Provides clear division of roles between the board and the service provider.</li> <li>• If available, the CMO arrangement (Attachment K) is free of conflicts of interest and there is a viable plan for identifying and managing potential conflicts</li> </ul>

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The narrative includes a broad and ambitious plan for instructional technology, including either a 1:1 device ratio or 1:3 device ratio, however the concepts are not supported with infrastructure or the budget.		192-193
<b>Final Application Review</b>		
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<p>The technology listed in the narrative is innovative and broad, however nothing is budgeted for devices or equipment. Earlier in the application it is indicated that all students will have a device (1:1), but in this section it says that there will be one device for every three students (1:3).</p> <p>Technology equipment, networking, infrastructure and IT support are not included in the budget and will not be provided by the Monroe County Schools (p. 151). Only \$5,000 is budgeted for networking which is a small fraction of the cost required.</p> <p>Power School is listed as the county's SIS which is the third system mentioned and none of the system's mentioned in the application are the correct SIS used by Monroe County Schools.</p> <p>The Monroe County School System will not be able to provide technology support or equipment for GAPA.</p>		192-193

Standard 2.10 Waivers

<b>2.10 Waivers</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>• Detailed description of waivers requested that includes compelling and thoughtful rationale describing how the waivers will impact student achievement.</li> <li>• A demonstrated understanding of the rules and statutes that cannot be waived under Tennessee law.</li> </ul>		
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Some of the waivers listed do not apply in Tennessee.		195-200
<b>Final Application Review</b>		
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Some of the waivers listed do not apply in Tennessee.	195-200

Standard 2 Open Items

<b>2.11 Network Vision, Growth Plan, &amp; Capacity (For existing operations)</b>		
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> <li>• Detailed strategic vision for the network that includes a robust five-year network growth plan. Growth plan should include the following: proposed years of opening; number and types of schools; a clear, detailed outline of any pending applications (whether in the same LEA, Tennessee or another state); all current and/or targeted markets/communities and criteria for selecting them; and projected enrollments.</li> <li>• Strong, compelling evidence of organizational capacity to open and operate high quality schools in Tennessee and elsewhere including specific timelines for building organizational capacity.</li> <li>• Clear, detailed description of the results of past replication effort, challenges, and lessons learned, and how the organization has addressed any challenges.</li> <li>• Realistic presentation of anticipated challenges and risks over the next five years associated with opening additional schools, along with a plan to overcome them to achieve the organization's stated outcomes.</li> <li>• Comprehensive and complete annual report (both network and individual schools) (Attachment L).</li> <li>• If facility has been selected, facility plans are reasonable and adequately meet the requirements of the educational program and anticipated student population.</li> <li>• If facility has not been selected, or selected facility needs renovations/upgrades, a sound plan and timeline for identifying, financing, renovating, and ensuring code compliance for a facility.</li> </ul>		
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## Section 2 Operations

<b>2.12 Network Management (For existing operators)</b>		
<p>Characteristics of a strong response:</p> <ul style="list-style-type: none"> <li>Leadership team identified and role and responsibilities listed.</li> <li>As Attachment M, organizational charts for Year 1, Year 3, and Year 5 clearly delineate roles and responsibilities of the governing board, including lines of authority between the board, school leadership, and staff. If applicable, the chart should include other related bodies (advisory bodies or parent-teacher councils) and a charter management organization if school has contracted with one and it will play a role in managing the school.</li> <li>Clear, compelling network strategy that includes any shared or centralized support services, along with their costs, across the network.</li> <li>Strong description of relationship between schools and charter management organization, including presentation of a contract or MOU (if applicable).</li> <li>Fees from member schools are clearly delineated, along with a rationale for their collection, use, and structure (if applicable).</li> <li>Associated table provided in application is complete with explanations for school and organization-level decision-making responsibilities.</li> </ul>		
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## Section 2 Operations

<b>2.13 Network Governance (For existing Operators)</b>		
<p>Characteristics of a strong response: 1) If there is a network board that operates as the main governing body with each school having an advisory committee:</p> <ul style="list-style-type: none"> <li>• Applicant provides a complete description of the governance structure at the network level and delineates how that relates to each individual school within the network.</li> <li>• Provides a robust plan for ensuring there is adequate local/Tennessee stakeholder representation.</li> <li>• Roles and responsibilities of this board described clearly and concisely.</li> <li>• Description of the current size and composition of the governing board, with a rationale of how the current/proposed governance structure and composition will ensure the desired outcomes of a network of highly effective schools.</li> <li>• A clear and compelling plan to evaluate academic and operational success including the evaluation of the school and school leader (s). 2) If there will be one governing board for all schools at the local level, or separate governing boards for each school: <ul style="list-style-type: none"> <li>• If there will be one governing board for all schools: <ul style="list-style-type: none"> <li>○ A clear, detailed description of the governance structure at the network level and how it relates to the individual school including any changes that will take place at the board level for it to be effective (if necessary).</li> <li>○ A copy of the by-laws and organizational chart is included. ○ A clear, thorough plan to transform the board's membership, mission and by-laws to support the expansion plan. Plan should include timeline for the transition and orientation of the board to its new responsibilities. <ul style="list-style-type: none"> <li>▪ If there will be a separate governing board for each school: ○ A clear, detailed description of how the new governing board will be formed and the relationship between the new and old boards described, along with any overlapping responsibilities.</li> </ul> </li> <li>○ Includes biographies of new board members, roles and responsibilities of the board described clearly and concisely, an organizational chart and governing board structure.</li> </ul> </li> <li>• By-laws of the new board are included (if available) and there is a plan in place for board training as required by Tennessee law.</li> </ul> </li> </ul>		
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### Section 2 Operations

<b>2.14 Charter School Management Contracts (For existing operators)</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>• As Attachment N, a detailed, strong rationale explaining the selection of the CMO, including descriptions of proposed duration of the contract, roles and responsibilities of the governing board, school staff, and the service provider, scope of services provided, performance evaluation measures, financial controls, and terms of renewal.</li> <li>• Draft of proposed management contract.</li> <li>• Detailed documentation of CMO's non-profit status, including evidence it is authorized to do business in Tennessee.</li> </ul>		
<b>Initial Application Review</b>		
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Section 2 Operations

<b>2.15 Personnel/Human Capital – Network-wide Staffing Projections</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>• Network staffing projections for each year are robust and aligned with the educational program and are conducive to the school's success.</li> </ul>		
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Section 2 Operations

<b>2.16 Personnel/Human Capital – Staffing Plans, Hiring, Management, and Evaluations</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>• Chosen leaders have necessary qualifications, competencies and capacity for their assigned roles.</li> <li>• Identifies strategies for supporting school leadership.</li> <li>• Recruitment and hiring strategy, criteria, timeline, and procedures are likely to result in a strong staff and meet requirements for being “highly qualified” and are well suited to the school.</li> <li>• Effective planning for unsatisfactory leadership/teacher performance and turnover.</li> <li>• The organizational charts (Attachment G) provided clearly delineate the roles and responsibilities of – and lines of authority and reporting among – the Board, staff, any related bodies (such as advisory bodies or parent/educator councils), and any external organizations that will play a role in managing the school.</li> </ul>		
<b>Initial Application Review</b>		
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Section 3 Finances

<b>3.1 Planning and Budget Worksheet &amp; 3.2 Budget Narrative</b>		
Characteristics of a strong response: <ul style="list-style-type: none"> <li>• Budget worksheet (Attachment O) contains assumptions and reasonable budget numbers that reflect rent, utilities, maintenance, insurance and build-out costs.</li> <li>• Detailed budget assumptions that include the impact of the anticipated number of students who receive free or reduced price lunches.</li> <li>• 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 (where applicable) financial and administrative audits.</li> <li>• Sound criteria and procedures in place for selecting contractors for any administrative services.</li> <li>• Complete, realistic, and viable start-up and five year operating budgets.</li> <li>• Detailed budget narrative (Attachment P) that clearly explains reasonable, well-supported revenue and cost assumptions, including grant/fundraising assumptions, identification of the amounts and sources of all anticipated funds, property, or other resources (noting which are secured vs. anticipated, and including evidence of firm commitments where applicable).</li> <li>• Sound contingency plan to meet financial needs if anticipated revenues are lower than estimated.</li> <li>• individual and collective qualifications for implementing the financial plan successfully, including capacity in areas such as financial management, fundraising and development, and accounting.</li> </ul>		
<b>Initial Application Review</b>		
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The budget is insufficient to support the charter school operations.		201-208
<b>Final Application Review</b>		
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Enrollment plans are higher than any other existing charter school in the state in a rural community, starting with 175 9th graders and ultimately having 800 students. These aspirations are unrealistic and possibly unmanageable.

There are no indications of cash flow other than the two initial lines of credit - one of the lines of credit from Smart Bank indicated up to \$500,000 for the MCMINN County Charter application and may not even apply to the Monroe County location. Also, the Smart Bank letter of intent said their line of credit was based on additional grants. (Donations? Cash on hand? Are board members responsible for raising funds? An \$800,000 charter grant is noted in the budget, but evidence of the grant approval is not present.) The Champions Real Estate Groups donation is a three-year proposal, conditional based on enrollment and application approval, and not guaranteed. GAPA anticipates receiving funds from the LEA beginning in July when the LEA will not have BEP income for the charter until August at the earliest. TCA states that the LEA can make nine payments to the charter school and the application indicates that the charter will begin receiving a beginning amount which the LEA will not have on hand. The LEA does not begin to receive revenue until August. In addition, the federal funds anticipated by the application are considered at the start-up and federal funds must be spent in a reimbursement style. Further, the federal dollar amounts anticipated to be received by the charter appear to be arbitrary and not connected to the LEA federal allocations.

Transportation and food services are in the application as revenue, however the application indicates that they will receive these services through the LEA. This is inconsistent and unclear.

No budget is included for substitute teachers. Even though the Operations section states that existing employees will cover for teachers who are absent, but this plan is unrealistic and inappropriate for a school of 800 students.

The property and liability insurance quote from Trustpoint Insurance is only for \$15,000 which is not a reasonable amount for a school this size. The actual cost for property and liability insurance would be much higher with the use of seven buildings and 14 traveling athletic teams, property and liability would.

The amounts listed for Social Security and Medicare are inconsistent between the budget narrative and actual budget. State retirement is not included in the budget and should be.

Employee positions and numbers of employees are listed inconsistently throughout the application and many of them are not included in the budget.

Budget summaries for the end of each school year have different allocations from the actual budget.

Athletic team coach stipends/supplements, athletic equipment, uniforms, etc. are not included in the budget. For example, football is

included as a fall sport, but there is not an existing football field on the campus or any related equipment. Football facilities would be a huge expense. All sports would require updating or new construction for facilities.	
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**Section 3 Finances**

<b>3.3 Financial Plan (for existing operators NOT required to complete Section 3.1 and 3.2)</b>		
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**Section 3 Finances**

<b>3.4 Financial Plan (for existing Charters)</b>		
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